RESPONSE TO THE DRAFT LONDON PLAN



Consultation response by Sian Berry AM On behalf of the Green Party group on the London Assembly March 2018



INTRODUCTION

The draft new London Plan is a step forward in spatial planning for London, and I am happy to see that, in setting out principles for 'Good Growth' the Mayor is focusing on transport oriented planning and town centres, while protecting London's Green Belt and Metropolitan Open Land.

However, the primacy put on density in the plan puts at risk a range of its other goals, including protection for local green spaces and support for Healthy Streets. Much more clarity is needed for how to reconcile these issues.

On housing, I am concerned that loopholes in the draft policies will enable 'affordable' housing that does not fit with the Mayor's new definition (and does not provide for the needs established in the strategic assessment accompanying the plan) will continue to be the preferred tenure provided by developers. Tighter policy wording, tenure splits defined in policy not left to boroughs to argue for, and more clarity on how the demolition of existing homes will be avoided, is needed in this plan.

On transport, I'm disappointed to see roadbuilding plans from the previous Mayor retained, and they must be removed. An explicit goal to reduce the need to travel and cut traffic is absent, with the plan focused on modal shift, which must be corrected.

Despite the Government's bullish attitude to parking in the development of previous plans, London needs to stand up for our largely noncar driving population and further reduce parking standards from what appears here.

Increasing new car-free housing across London is a fundamental basis for reducing traffic, and



it has evidence to support it. In addition, the centre of London needs a clearer and more ambitious vision of traffic free streets by 2040.

I am pleased to see some new policies that take up the proposals in our report Towards a new London Plan.¹ These include 'town centre first' principles, the embedding of Healthy Streets within many sections of the plan, better protection for industrial floorspace, and for pubs and music venues through the agent of change principle. I am also pleased to see a hook for boroughs to help prevent unoccupied homes, and new policies to support meanwhile use and prevent arbitrary rules from being imposed on private public spaces.

But the plan leaves too much work for boroughs on a number of strategic issues where the Mayor is best placed to determine need, such as home sizes and the needs of Gypsies and Travellers.

And many new policies are too technocratic and lack a process for involving communities. London needs much better policies than this to support resident- and community-led development, particularly for regeneration and small sites.

Sian Berry AM March 2018



CONTENTS

CHAPTER 1 – GOOD GROWTH POLICIES	4
CHAPTER 2 – SPATIAL DEVELOPMENT PATTERNS	6
CHAPTER 3 – DESIGN	11
CHAPTER 4 – HOUSING	19
SOCIAL INFRASTRUCTURE, ECONOMY, HERITAGE AND CULTURE	33
CHAPTER 8 – GREEN INFRASTRUCTURE AND NATURAL ENVIRONMENT	43
CHAPTER 9 – SUSTAINABLE INFRASTRUCTURE	48
CHAPTER 10 – TRANSPORT	54



CHAPTER 1 – GOOD GROWTH POLICIES

The Good Growth policies set out the strategic goals of the new draft London Plan, and the overall approach of the Mayor to development.²

These take into account the overwhelming need to provide more – primarily affordable – homes for Londoners while doing more to protect essential Green Belt and Metropolitan open land than the current London Plan.

The policies on industrial space are stronger than the Mayor's vision document, A City for All Londoners, but we have some concerns that existing industries in central London still need more protection if we are to build a truly resilient economy.

The focus of development on transport links and town centres is rational and will help to cut car dominance, but these policies lack an overall goal of reducing the need to travel and cutting traffic, which should be added if these policies are really to support sustainable development.

GG1 BUILDING STRONG AND INCLUSIVE COMMUNITIES

This policy sets out the key goals of the plan, and these are broadly right. However, improving access to services and a goal of reducing the need to travel should be included in parts C and part F of GG1.

It also needs a new part that pledges London to being inclusive in the process of planning for its future, and involving communities.

GG2 MAKING THE BEST USE OF LAND

This policy sets out an approach to prioritising transit-oriented development and promoting the use of small sites. This is welcome and, in spatial development terms, is the correct way to ensure green sites are not prioritised for development.

Protecting Green Belt and Metropolitan Open Land (MOL) for the life of the plan was one of the key requests in my document Towards a new London Plan in 2016, and I am happy the Mayor has done this.

However, I believe the wording of the detailed policies that cover these issues should be tightened and we have some concerns about the potential for MOL swaps (see our comments on policies G2 and G3).

I am also concerned that the protection of existing small green spaces may not be sufficient when set against the detail of the density policies, particularly D6.

Part E should be amended to include promoting access to local services and reducing the need to travel.

GG3 CREATING A HEALTHY CITY

Following my recommendations in Towards a new London Plan, I am pleased to see policy GG3 C ask that the Healthy Streets Approach is applied to "all planning decisions". This is very strong.



However, the policy misses the chance to promote access to healthcare, and another opportunity to promote reducing the need to travel, by not including a policy to make sure healthcare and social support facilities are provided within walking and cycling distance for all. The policy should include a new part that does this.

Part D is a good policy to require the impacts of development on health to be considered, though it does not specify when health impact assessments are to be required, and the supporting text does not provide details of this either. These omissions should be rectified either in supporting text or supplementary guidance, so that communities know when they can demand more detailed assessments.

GG4 DELIVERING THE HOMES LONDONERS NEED

Policy GG4 B includes the Mayor's "strategic target of 50 per cent of all new homes being genuinely affordable."

This, along with GG4 A, which says: "Ensure more homes are delivered," implies that strategically 50 per cent is the plan's target for the <u>net gain</u> in affordable homes it will provide.

This target does not meet what the Strategic Housing Market Assessment (SHMA) has said is the need in London, and needs to be changed to 65 per cent to meet the evidence base.

My comments on specific policies later in this response seek to tighten up this target and the definition of affordable, and seek to apply a proper net target to make sure that demolished homes are taken into account when assessing any gains made by individual applications.

GG5 GROWING A GOOD ECONOMY

The economic development policies in this plan are too siloed, and based on a small number of growth areas. There are gaps where a much more mission-focused set of goals and policies should be, such as supporting low-carbon industries and green innovation.

This is reflected here too. Policy GG5 B says: "Seek to ensure that London's economy diversifies and that the benefits of economic success are shared more equitably across London." This is a good aim but, although later parts of the policy specifically mention innovation and a 24-hour city, the policy does not give similar specific support for small businesses, when it should. Smaller businesses in London are facing unique challenges that need a top-level goal stated in this policy.

Policy GG5 C puts preserving industrial space into the priorities for the plan. This, combined with the detailed policies later on in the plan, is a big improvement on what the Mayor said in A City for All Londoners, which implied a reduction in industrial space across most of London.

"In some areas, industrial land may be surplus to current needs and could be better used for housing. It may be possible to relocate industry to other areas of the city without disrupting the economy or eroding the critical base of industrial land."

A City for All Londoners

However, details of these policies need to be amended, as proposed later in my response. Here, the addition of "in the right locations" to part C and the lack of a stated goal to 'protect' or 'preserve' existing industrial space in this section of the draft Plan still needs to change.



CHAPTER 2 – SPATIAL DEVELOPMENT PATTERNS

My main criticism of these polices is the absence of real community involvement set out in them, especially when it comes to the new local Strategic Areas for Regeneration near town centres.

I am also concerned that this new draft Plan removes the previous London Plan's policy 2.4 on the 2012 Games and legacy. I believe this is too soon, as the games were only five years ago. Many of the regeneration targets, including the measurable convergence goals for the Growth Boroughs, have not been reached and need continued monitoring.³

The Growth Boroughs Partnership, on its website, says: "The most enduring legacy of the Olympics will be the regeneration of an entire community for the direct benefit of everyone who lives there," and emphasises that: "Delivering this commitment will be neither simple nor quick."⁴

The Mayor should continue to push to achieve the goals of the 2012 Games and they should be included in this Plan.

SD1 OPPORTUNITY AREAS AND SD10 STRATEGIC AND LOCAL REGENERATION

This policy defines a number of opportunity areas, as part of growth corridors, and the detailed maps show a number of new Strategic Areas for Regeneration (SARs) which are often industrial or retail sites near to transport links.

This is a rational move and supports the goals of the Good Growth policies to focus more development around public transport.



However, the policies fail to include specific reference to green spaces, recreation and outdoors sports when planning for these new areas of development. Policy SD1 B (3) should be amended to include these elements, and to better match the later provisions of policy D1 A.

Policy SD1 is also unusual in not integrating the need to apply a Healthy Streets approach. It also, again, fails to include planning for reducing the need to travel and providing essential services within walking and cycling distance, instead only including the need for "ambitious transport mode share targets" in policies SD1 A (8) and B (7). Therefore, both these parts of the policy should be amended.

Proposed amendments to SD1 (changes highlighted in bold):

Policy SD1 A (8)

ensure that development follows Healthy Streets principles, plans for reducing the need to travel, and facilitates ambitious transport mode share targets.

Policy SD1 B (7)

support Healthy Streets principles and the provision of essential services within walking distance to reduce the need to travel, and include ambitious transport mode share targets.



Figure 2.19 in the Plan has a diagram showing the Mayor's designated SARs across London. Policy SD10 A (1) asks boroughs to put these SARs into their local plans, and SD10 A (2) asks them to set out further Local Areas for Regeneration. It could be positive that the Mayor is defining areas for regeneration strategically at a London level. However, there is potential for other policies, such as D6, to clash with the needs of local communities in these areas. This could also incentivise too much demolition of existing homes and buildings, and needs to be carefully mitigated in other policies if this is to work.

Please see my comments on the following policies for ways the draft plan needs to be strengthened to make sure that regeneration is a positive not destructive influence on the future of London:

- SD9 Town centres: Local partnerships and implementation
- D2 Delivering good design
- H2 Small sites
- H10 Redevelopment of existing housing and estate regeneration
- E2 Low-cost business space
- E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function
- HC5 Supporting London's culture and creative industries

Neighbourhood and community-led planning has been left out

The policies for how the boroughs should support Opportunity Areas and SARs with new planning frameworks (including SD10 which deals with these specifically) do not include anything like the level of community involvement in developing new areas that was



proposed in Towards a new London Plan. In that document, I said the London Plan should: "encourage the use of Neighbourhood Development Orders and Community Right to Build Orders by communities as a positive way of speeding up developments that fit with the vision of local residents."

However, policy SD1 B (9) instead just says: "Ensure planning frameworks are subject to public and stakeholder consultation."

Policy SD10 C just as blandly says only: "boroughs and other stakeholders" should be involved in developing plans for town centres and areas for regeneration.

Proposed amendments to SD10

Parts B and C need to be amended to include the need for community-led planning, to mandate wide consultation not just on the detail but from the stage of defining the goals of regeneration, and the key role that Neighbourhood Planning could play.

Later in this response I also comment on where other policies should include support for Neighbourhood Forums and community-led planning:

- SD9 Town centres: Local partnerships and implementation
- H2 Small sites
- H10 Redevelopment of existing housing and estate regeneration
- E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function

SD2 COLLABORATION IN THE WIDER SOUTH EAST **AND SD3 GROWTH** LOCATIONS IN THE WIDER SOUTH EAST AND BEYOND

Policy SD2 reflects the duty to co-operate in the National Planning Policy Framework (NPPF), but does not go far enough in outlining the areas in which London and the wider South East need to work together in the period of this plan.

Paragraph 2.2.3 recognises the impact of the 800,000 commuters who live in these areas and work inside London, but the policies here do not reflect the housing pressures that exacerbate this, or set out clearly enough the need to work with other authorities to cut the car dependency seen in many of their areas.

This could be done through transport planning, to improve public transport links that cross the GLA area boundary, or by helping to develop evidence for the wider application of traffic reduction spatial policies.

The Plan should signal in paragraph 2.3.6 that the Mayor does not support road-based infrastructure projects within the wider South East Strategic Infrastructure Priorities, and say how he will seek to influence these. Road-based projects, particularly in the Thames Gateway area will detrimentally affect outer London boroughs that border these areas, which already have higher car dependency than the outer London average, see the chart below.

Strategic infrastructure priorities that should be opposed in the plan therefore include:

- Expressway road link (Oxford to Cambridge)
- A27/M27/A259 corridor road expansion •
- A217 and A13 corridor •
- Lower Thames Crossing

Not all of our surrounding authorities are taking the same approach as London to the conservation of the Green Belt.

CPRE has published research showing that extensive low-density housing development in areas just outside London are set to add one million new car journeys a week on outer London roads.⁵

At least in the supporting text, these policies should include a goal of protecting areas of London's Green Belt that lie outside our boundaries and plans to work with these authorities to achieve this.



40%

Proportion of travel to work by car, 2011 Census⁶



SD4 THE CENTRAL ACTIVITIES ZONE (CAZ) AND SD5 OFFICES, OTHER STRATEGIC FUNCTIONS AND RESIDENTIAL DEVELOPMENT IN THE CAZ

I welcome policies in SD4 and SD5 that seek to build a more sustainable economy and a healthier environment within the Central Activities Zone (CAZ), but do not think these go far enough.

I am happy that policy SD4 D asks for an "air quality positive approach where possible" within the CAZ. I also welcome SD4 M, which seeks to protect industry and logistics in the CAZ and promotes "last mile distribution."

However, I believe the draft policies here suffer from a lack of a vision for the CAZ in the future to be predominantly traffic free. The Plan period ends in 2040 and it shows a serious lack of ambition not to have a clear strategic goal to reduce traffic dramatically in the CAZ by the end of the plan.

Policy SD4 doesn't even include the Mayor's mode shift goal seen in other relevant policies, or a goal to reduce traffic in real terms. This policy should be amended to include both these things, and the CAZ should have a near 100 per cent goal for mode shift away from cars, not just the overall 80 per cent goal that exists for London as a whole.

Policy SD5 seeks to discourage residential development and protect office space from permitted development rights, which will help to reverse some of the losses that have occurred in recent years. I am pleased with the strong support given to boroughs to develop Article 4 directions here.

SD6 TOWN CENTRES

Policy SD6 A (6) includes reference to the Healthy Streets approach but should be amended to include an overall goal for reducing traffic in these areas through planning.

Policy SD6 C should also be amended. It includes a welcome comment on reducing the need to travel, which is absent from many other places in the plan, but talks about "capitalising on the availability of services within walking and cycling distance" instead of "maximising" these.

Part I doesn't quite make up for this, and should also be amended, as shown below.

Proposed amendment to policy SD6 C (addition in bold):

I The provision of social infrastructure should e enhanced, and facilities should be located in places that **reduce the need to travel and** maximise footfall to surrounding town centre uses.

SD8 TOWN CENTRES: DEVELOPMENT PRINCIPLES AND DEVELOPMENT PLAN DOCUMENTS

I very much welcome policy SD8 A (1), as this sets out a sequential approach to putting retail, commercial, offices, leisure, entertainment, culture, tourism, and hotels in town centres first, and then on the edges of town centres.

This policy really is about reducing the need to travel and is a much stronger 'town centre first' approach than the previous London Plan.

In addition, policy SD8 A (2) resists new out of centre development, and SD8 A (4) encourages



the redevelopment of existing out-of-centre retail and leisure parks for housing.

I support these new policies, which follow suggestions in my document Towards a new London Plan, where I provided some of the evidence to support them.

"The success of the town centre first principle (and a clear sequential test) that was added to national planning policies during the 1990s has been well documented as a key contributor to reducing the rise in car traffic and these principles should be firmly embedded in the next London Plan."^{7,8}

Towards a new London Plan

I also support SD8 C (3) which is another policy aimed at reducing traffic in town centres, even in the absence of a goal to achieve this.

Policy SD9 C

3) support efficient delivery and servicing in town centres including the provision of collection points for business deliveries in a way that minimises negative impacts on the environment, public realm, the safety of all road users, and the amenity of neighbouring residents.

Policy SD8 C (4) is a new policy that seeks to help small businesses by making sure smaller unit sizes are included in new developments. However, it does not include making sure any of these smaller units are affordable and should be amended to say this.

Please also see our further criticisms of the policies on affordable business and workspace in the Economy chapter.

SD9 TOWN CENTRES: LOCAL PARTNERSHIPS AND IMPLEMENTATION

This policy is a key place that local communityled planning and Neighbourhood Forums, which always include local businesses when in town centre locations, are missing out on support from the draft plan, and this must be rectified.

Policy SD9 A should be therefore be amended to add reference to these groups.

Amendment to SD9 A (changes highlighted in bold):

To develop strong, resilient and adaptable town centres, fulfilling their full potential to accommodate growth and development, strategic and local partnership approaches, community engagement, **Neighbourhood Forums**, town centre management, business associations and Business Improvement Districts should be supported and encouraged.



CHAPTER 3 – DESIGN

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

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

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

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

D1 LONDON'S FORM AND CHARACTERISTICS

This policy gives the top line goals for the design chapter, and reflects the Good Growth principles set out in chapter 1.



Fig 3.1 in the draft plan shows the **Circular Economy Hierarchy** for building approaches:

Source: Building Revolutions (2016), David Cheshire, RIBA Publishing ©



However, supporting text 3.1.12 which comments on this has a final sentence which effectively undermines the approach completely by referencing the overall approach to maximise density.

The policies and supporting text are largely good, but with one important change needed, in order that buildings are not demolished unnecessarily, undermining sustainability policies.

Combined with D6, where I also comment on this, this policy undermines the need to retain and refurbish existing buildings wherever possible. The wording means that any proposal that increases density, even by a small amount, would be preferable.

Proposed amendment to supporting text (deletion in bold):

3.1.12 Figure 3.1 shows a hierarchy for building approaches which maximizes use of existing materials. Diminishing returns are gained by moving through the hierarchy outwards, working through refurbishment and re-use through to the least preferable option of recycling materials produced by the building or demolition process. The best use of land needs to be taken into consideration when deciding whether to retain existing buildings in a development.

D2 DELIVERING GOOD DESIGN

This is a key example of a policy where much more is needed on involving local communities in developing local policies and plans.

This is important, along with my proposed changed to policy H2, so that small sites are developed in a consensual way and don't become bogged down in contentious planning



battles. Local authorities highlighted this risk to the Housing Committee in our discussions about the draft London Plan in January 2018.

Policy D2 A on 'initial evaluation' should include an approach to the identified small sites within each area, and the need to define the appropriate density for each one, by working with local residents.

Neighbourhood Forums, where they exist, are ideal to engage with as they are likely to have already considered the small sites in their areas. This requirement could be included in parts A and B of policy D2 B, so that public involvement starts at the stage of the initial evaluation and continues through the process.

Policies D2 F and D2 G on design review should also include local community involvement. Design panels should be required to be transparent and invite the views of local people and/or be tasked with paying attention to the views expressed in pre-planning and planning consultations when making their judgements.

Proposed amendments to policy D2 (changes highlighted in bold)

D2 F - addition to first sentence:

Boroughs and applicants should use design review to assess and inform design options early in the planning process, gaining views from the local community and resident organisations about alternative options ahead of the planning process.

D2 G – additional numbered part:

X) Design review panels include representatives from the local community, and engage transparently with local people, taking up any comments received during planning or pre-planning and views expressed in any Neighbourhood Plans.

D3 INCLUSIVE DESIGN

Supporting text 3.3.3 asks rightly that security considerations should not affect accessibility. These two issues can be successfully balanced when needed, and I would like to see this provision moved into the policy box itself.

Move into policy D3:

"3.3.3 Where security measures are required in the external environment, the design and positioning of these should not adversely impact access and inclusion."

D4 HOUSING QUALITY AND STANDARDS

I welcome the reinforcement of space standards for homes, along with the new standards for storage given in table 3.1, along with new minimum standards for balconies and outside space.

The new policy in D4 E which aims to "maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings" is also positive.

Policy D4 G asks for separate storage space for dry recyclables and food, which needs to be amended to be stronger, as set out below. This is vital if planning policies are to contribute to improving London's woeful record on recycling.

Proposed amendment to policy D4 G (changes highlighted in bold):

Dwellings should must be designed with adequate and easily accessible storage space that supports the separate collection of dry recyclables (for at least card, paper, mixed plastics, metals, glass) and food.

MISSING DESIGN POLICIES

Back garden protection

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

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

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

Retrofitting homes and buildings

The Mayor's draft Environment Strategy says that 100,000 homes will need to be retrofitted with energy efficiency technologies each year to meet the target of zero emissions by 2050.⁹ However, there is no reference to retrofitting in this section. This omission needs to be rectified with the restoration of policies from the current London Plan (Policy 5.4 retrofitting).¹⁰

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

Poor doors and poor gardens

Policy D4 A asks that the design of housing



"should not differentiate between housing tenures." This is a very good new policy to prevent the growth of 'poor doors' and differences in standards between affordable and market housing provision. However, the policy could be clearer that this should apply to standards between different buildings in a development not just to different parts of the same building, to prevent developers switching to an even more segregated policy of 'poor blocks'.

In addition, there is no equivalent statement against tenure differences in parts 9 and 10 of this policy, which describes the provision of outside space, this can be rectified with the simple addition of a few words to part (9).

Proposed amendment to policy D4 A (amendment highlighted in bold):

A minimum of 5 sqm of private outdoor space, with no difference in quality or quantity between tenures, should be provided for 1-2 person dwellings and an extra 1 sqm should be provided for each additional occupant.

Communal outside space also needs similar provisions so that the children of occupants are not segregated by tenure. In my response to the draft Housing Strategy I commented on this issue.¹¹

I have recently seen at least one disturbing example of a development with different tenures for different blocks, which gave children in the market and affordable homes separate rooftop play areas. Therefore, I also believe policies to avoid tenure segregation should be extended to apply to playgrounds and outdoor spaces for residents.

Response to the draft Housing Strategy

These comments are relevant to the provisions of policy S4, where I have also proposed an amendment.

Detailed guidance is promised on the implementation of all aspects of D4 and we look forward to seeing this and commenting further.

D6 OPTIMISING HOUSING DENSITY

This is a very problematic policy as the use of the word 'must' in policy D6 A has the potential to mitigate against a whole range of other policies in this plan, including policies to reduce demolition, protect green space, ensure good design, and develop small sites in ways that fit in with their local context.

I propose amending D6 A as below. By leaving in simply a requirement to meet 'optimum' density requirements, the policy fits much better with the design-led approach in D2. The additional words, including 'must' are not required and are the main source of danger.

Proposed amendment to policy D6 A (amendment highlighted in bold):

Development proposals **should** must make the most efficient use of land and be developed at the optimum density."

The closing statement in part A should also be removed, as it is superfluous, unless intended to override the safeguards provided by the other policies in the plan that try to achieve the goals listed above.

Proposed residential development that does not demonstrably optimize the housing density of the site in accordance with this policy should be refused.

Policy D6 C gives density limits above which



additional scrutiny of design is required. This is the only place in which any guidance on specific density levels is given. In discussions at the London Assembly, officers defending the removal of the density matrix offered these limits as guideline densities.

I join the Assembly as a whole in being concerned about the removal of the density matrix and believe that the plan should be more explicit about a range of density benchmarks even while promoting a locally based design-led approach. I also support the suggestion in the Assembly's response that the Mayor should update the current SHLAA character map and the London Plan Character and Context SPG (2014).

The Assembly response is also right to ask that any new density guidelines should use a wider range of measures to assess accessibility of sites. Transport for London (TfL) has outlined the following issues that are relevant:

- Access to jobs within 45 min by public transport
- Access to a rail station by walking
- Access to services (represented by walk distance to a town centre).

London Assembly recommendation for D6

We recommend that the density matrix be restored and linked to Policy D6. It should be refined by adding a further dimension that addresses access to services and local infrastructure, along the lines of the TfL density report. A refined matrix would then serve its original purpose and fit more appropriately across the varied local character, accessibility and infrastructure provision found across London. Applications would therefore more likely fall within the matrix and with what communities can reasonably expect to be delivered over time. Policy D6 B talks about assessing housing capacity against both existing and planned infrastructure, including transport, and asks that infrastructure is brought forward at the appropriate time, allowing for the phasing of developments. Boroughs told the Housing Committee this was crucial for them, and I strongly support this policy.

However, this clause should be amended to remove the phrase "in exceptional circumstances" as phased development to match infrastructure provision should be the norm not an exception.

Proposed amendment to policy D6 B (changes highlighted in bold):

This may mean, in exceptional circumstances, that development is contingent on the provision of necessary infrastructure and public transport services and that the development is phased accordingly.

D7 PUBLIC REALM

I am pleased to see in D7 G a brand new policy on the management of private public spaces. This is welcome, and reflects what I have been campaigning on and asking for through Mayor's Questions, a motion passed by the London Assembly in September 2017, and what I asked for in Towards a new London Plan.¹²

Supporting text 3.7.9 has more details and promises a Public London Charter to set out rights and responsibilities for the users, owners and managers of public spaces, asking that these "should be secured through legal agreement or planning condition."

I would like to see the policy box reflect this proposal too.



Proposed amendment to policy D7 G (changes highlighted in bold):

Ensure appropriate management and maintenance arrangements are in place for the public realm, **secured by legal agreements or planning conditions,** which maximise public access and minimise rules governing the space to those required for its safe management in accordance with the Public London Charter.

In developing the new Public London Charter, I hope the Mayor will look at new planning guidance being proposed by the London Borough of Camden, which includes measures such as encouraging break clauses to aid the enforcement of agreements.¹³

The Public London Charter also needs to set out a transparent and democratic process by which initial rules set by the planning conditions can be altered, either by the local community or developer when circumstances change.

Many people are concerned that a large number of new public spaces in London are being allowed to be created where public access is only at the discretion of the landowner and the local authority has no governance role over any regulations for its use. These 'private public spaces' are extensive and well-known examples include the Broadgate area of the City, Kings Cross Central and the More London development in which City Hall itself sits.

The growth of 'private public spaces' can be reduced with a simple new policy in the next London Plan. This should specify that new public spaces created in London must, through planning conditions, be governed by accountable public by-laws not private rules.

Towards a new London Plan



Supporting text should also ask that the Healthy Streets Check tool is used in assessing all new public realm proposals and that any changes to existing public realm should only be allowed if they improve the score of an area using this tool.

Water drinking fountains

Policy D7 M is a new policy to support free drinking water in new public spaces and this is very welcome and follows work on this by my predecessors. It is worth bearing in mind that even with similar policies in the current London Plan (Policy 7.5 public realm) and the former Mayor's promise of a "new era of public fountains" in 2008, these failed to materialise.¹⁴ To ensure a successful rollout this time, the Mayor must start immediately where he has most influence, identifying and delivering sites at all major transport hubs, at all London Underground stations and other locations where he has direct control.

He must also develop borough targets to address local discrepancies. For example, the borough of Lambeth has 25 drinking fountains around its parks and open spaces but others, such as Sutton, Enfield and Haringey, have none and no plans to install any.¹⁵

Proposed amendment to Policy D7 M

This policy should be amended to specify that the Mayor will identify areas of water drinking fountain deficiency and work with boroughs to develop strategies to address these.



Meanwhile use and temporary public realm

Policy D7 K asks developers to look for opportunities for the meanwhile use of sites and temporary public realm. Supporting text 3.7.12 has more details of this.

In general, I am impressed with the draft Plan's integration of a range of meanwhile uses in its policies (which also appear in policies SD8, H4, and HC5 and its supporting text) and I strongly support this.

D10 SAFETY, SECURITY AND RESILIENCE TO EMERGENCY

In my response to A City for All Londoners I expressed concern at the primacy given to police recommendations when assessing the security of developments and public spaces, as they may clash with other goals of the Mayor.

Some of the design recommendations promoted by police can lead to solutions that don't maximise the utility of public realm for pedestrians and people on bikes, such as the removal of places to sit and community severance when 'escape routes' for criminals are closed off.

We recommend that the Healthy Streets and Lifetime Neighbourhoods principles are prioritised within the new London Plan as the best way to maximise the utility and feeling of safety in the design of public spaces and streets.

Towards a new London Plan

I am therefore disappointed to see that policy D10 A again defers to the police and only design out crime principles. This potentially clashes with some equalities and Healthy



Streets principles, and carries a risk that different standards may be applied to different communities in London.

I believe the solution now may not be to ask again for the policy to be changed, since the Mayor has rejected my proposals.

Instead, I propose that the Mayor brings together TfL and campaigners for accessibility, equality and active travel with the police to review, update and improve police guidance to better fit in with these other Mayoral priorities.

D11 FIRE SAFETY

This is a new policy, which asks for a new Fire Statement for all major development proposals with an independent fire strategy.

Fire safety is a rapidly developing area of policy and regulation, and I hope that these policies, which seem to be quite rough and initial at present, will be updated as the London Plan process continues to further reflect both Government and public expectations.

If possible, revised policy should include processes for checking, through building control, the compliance of finished buildings with the plan, and more about transparency and ways for residents to check the promised safety measures have been implemented.

D12 AGENT OF CHANGE AND D13 NOISE

Policy D12 is a new policy adopting the agent of change principle, aimed at protecting existing music venues and community facilities when new residential developments are created near them, and at protecting existing residents from noise from new venues.

It is a very positive new policy that takes up the recommendations of the Music Venues

Taskforce in their original and updated Rescue Plans and the work of my predecessor Darren Johnson AM since 2014.^{16,17}

While the policy places the correct onus on the agent of change to act to prevent noise impacts, the wording could be strengthened to be clearer that the ultimate goal of the policy is the protection of residents, whether new or existing, from noise and the need for measures to achieve this. Policy D13 should therefore be amended as below.

Proposed amendments to policy D13 (changes highlighted in bold)

D13 A (2):

reflecting the Agent of Change principle to ensure measures do not add unduly to the costs and administrative burdens on existing noise generating uses, while ensuring that the main priority is the protection of neighbours from noise generating activities

D13 A (3):

mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on development; however, where its noise impact cannot be satisfactorily dealt with, the proposed new development should be turned down.

Policy D13 is a new policy on noise, which acknowledges the impact of noise on health and asks boroughs to identify new Quiet Areas and protect existing Quiet Areas. It does not, however, include a goal to increase the quietness of existing local green spaces. CPRE has studied the noise levels at a range of London green spaces and found that nearly 30 per cent of London's parks are severely impacted by traffic noise.¹⁸ I also support CPRE London's proposal to amend this policy. Supplementary text should outline suitable actions to achieve this, including reducing traffic noise around parks.

Proposed amendment to policy D13 B

Boroughs, and others with relevant responsibilities, should identify and nominate new Quiet Areas and protect existing Quiet Areas in line with the procedure in Defra's Noise Action Plan for Agglomerations, **and ensure that noise levels are reduced in local green spaces.**



CHAPTER 4 – HOUSING

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

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

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

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

H1 INCREASING HOUSING SUPPLY

The ten-year targets based on the SHMA and Strategic Housing and Land Availability Assessment (SHLAA) are very stretching, particularly for outer boroughs.

The priority given in the policies to the range of brownfield, already developed and currently non-residential sites is good. But this section of the plan, in contrast to the town centre first principles in policy SD8 A, does not set out a sequential priority for these, and should be amended.

With difficult targets and some uncertainty about population growth expectations for London, it is likely that green sites or existing housing estates will be included in borough site allocations. With no sequential test, these could be developed before preferential but more difficult sites – or even instead of them – during the period of the plan.

A sequential principle needs to be applied in some way to mitigate this risk. We would also like to see land currently used for road space listed in part B (2) as a source of developable land when it is redundant.

Table 4.1: Net annualised requirement for new nomes in London, 2016 to 20411							
	1 bedroom	2 bedrooms	3 bedrooms	4+ bedrooms	Total	% of total	
Market	10,682	2,043	4,101	6,210	23,037	35%	
Intermediate	4,334	3,434	2,409	1,693	11,869	18%	
Low cost rent	21,318	5,311	2,462	1,881	30,972	47%	
Total	36,335	10,788	8,971	9,783	65,878	100%	
% of total	55%	16%	14%	15%	100%		

Table 4.1: Net annualised requirement for new homes in London, 2016 to 2041¹⁹



Suggested amendments to policy H1:

An addition to the policy asking that boroughs assign phasing to their major sites in policy H1 B.

Policy H1 D would also be a suitable place to ask boroughs to be clear how they are prioritising their most sustainable sites, closest to town centres and public transport, first in their housing trajectories and delivery plans.

Policy H1 B (2) should be amended (addition highlighted in bold):

d) the redevelopment of surplus utilities and public sector owned sites, **including redundant road space**.

Actions by the Mayor, such as infrastructure funding and land assembly, as described in supporting text 4.1.4, could also be used to support this principle to ensure that the least preferable and accessible sites are not brought forward first by developers.

H2 SMALL SITES

This is a new policy and I support the general principles of bringing forward small sites and encouraging more creativity and diversity in the building industry, and particularly its support for smaller builders and community-led housing.

It is very welcome that policy H2 A (4) mentions community-led housing, and that supporting text 4.2.10 states how "Small sites can be particularly suitable for well-designed community-led housing projects," and asks boroughs to support these.

Policy H2 B (2) should be clearer what 'areawide' means in terms of scale. It would be ideal for the policy to align these areas with those used in Neighbourhood Plans, where these exist, and for local communities to be involved in setting out the scale and typology of design for specific sites.

Proposed amendments to policy H2 B (2) (changes emphasised in bold):

Design codes should provide clear guidelines and parameters for small housing developments and show how additional housing provision can be accommodated in different locations on specific sites in these areas, working with the local community and any Neighbourhood Forums to define appropriate development for these sites

I also have some concerns about the presumption in favour of certain kinds of housing development on small sites in H2 D.

Nothing is included to ensure appropriate local community involvement in defining appropriate density and design for small sites. This could create opposition, long delays and unacceptable loads on borough planning departments if not clarified.

Policy H2 D (2) gives examples of ways to increase the density of existing residential homes that will be supported and lists examples of how this could be done, and needs to be amended.

The wording of this part of the policy should state that the list of proposals is given in a preferential order, starting with the lowest impact way to increase density (conversion of existing buildings) and ending with the highest impact option (demolition and redevelopment).

This would comply with the Circular Economy Hierarchy cited in figure 3.1 and help guide option selection when choices are being made about how to densify a particular small site.



Proposed amendments to policy H2 D (changes emphasised in bold):

2) proposals to increase the density of existing residential homes within PTALs 3-6 or within 800m of a Tube station, rail station or town centre boundary **through these methods where appropriate and in sequential preference:**

This improvement to the policy would also require parts c) and d) to be reversed.

In addition, to ensure that building out into gardens and reducing green space is not done in preference to adding new storeys where this can be done without causing problems with light and overlooking in adjacent sites, a further part should be added to this policy to show this priority.

Policy H2 D also needs to be clearer about whether the creation of larger homes is supported.

The definition of density in policy D6 (D) allows for this to be measured in terms of the number of habitable rooms and bedrooms as well as number of units, which is not necessarily a way of contributing to the overall housing needs targets if more unoccupied rooms are created in an already large home lived in by a single family.

Supporting text 4.2.11 resists the amalgamation of smaller flats into larger homes, but the creation of unnecessarily large homes using the new presumption should also be resisted with clear policy wording as these do not bring real benefits to set against any harm (e.g. removing green space or digging basements).

Further changes to policy H2 D:

H2 D (2) and (3) could be used to justify increasing the size of homes beyond what the residents will use. Part 3 says 'to provide additional housing' but not that this is for additional <u>units</u>. This should be amended to be clearer.

In policy H2 D (2), supported by paragraph 4.2.5 and by the map in Figure 4.3, it is unclear why 800 metres has been chosen as the distance from transport infrastructure and town centres where this policy will apply. The PTAL methodology uses 960 metres as the cutoff point for considering the accessibility of a tube or rail station, and the policy should either be amended or more evidence given.²⁰

Policy H2 E makes clear that ensuring local communities have a say over the quality and appropriateness of development depends on boroughs developing design codes.

This policy risks placing considerable burdens on local authorities, some of whom told the Housing Committee that small sites are often as much work for planning teams (and as controversial) as larger sites.²¹

It is unclear that councils will be able also to produce detailed design codes in a timely way, so the Mayor should provide more initial guidance to act as an interim code, and should support boroughs to create these as soon as possible, ideally before the new London Plan is fully in force.

Amendment needed to policy H2 E:

Supporting text 4.2.6 says: "The Mayor will set out design principles for small housing developments across London as part of his review of GLA design guidance," and therefore the policy box should be clearer



that this guidance, or the ideas for local design contained within Neighbourhood Plans where they exist, will apply in the absence of a new local design guide.

Green space and back gardens

(And see my related comments on policy G4 and the design chapter.)

In this policy, supporting text 4.2.9 does not guarantee the replacement of the benefits of green space on small sites. Green roofs and sustainable urban drainage require monitoring and maintenance, and this is not ensured with these policies, which in effect set no limits on the loss of back gardens and could lead to the complete removal of a green space.

"4.2.9 Loss of existing biodiversity or green space, as a result of small housing developments, should be mitigated through measures such as the installation of green roofs, the provision of landscaping that facilitates sustainable urban drainage, or off-site provision such as new street tree on order to achieve the principle of no net loss of overall green cover."

The text suggests that biodiversity and green space removal on small sites can be fully mitigated by the provision of green roofs and sustainable urban drainage, whereas the biodiversity and ecological advantages of small green spaces, including back gardens that link up across an area, are much wider than this could achieve.

The text describes a requirement of "no net loss of overall green cover" but 'green cover' is not a term that is recognised or something that can ensure the benefits of real green space are maintained.

Proposed amendment to policy H2 D:

The presumption in favour of building on small sites should support adding storeys (providing they don't cause significant overshadowing) rather than building out into private gardens.

The replacement of green space with off-site street trees is not acceptable, and any reworded next needs to include a requirement for the full, equivalent, high quality, nearby replacement for any public green spaces of any size that are lost in proposals for development on small sites.

H4 MEANWHILE USE

This is a very short new policy, but its inclusion in the draft new London Plan is very welcome and is something that was suggested in Towards a new London Plan.

Policy H4 Meanwhile use

Boroughs are encouraged to identify opportunities for the meanwhile use of sites for housing to make efficient use of land while it is awaiting longer-term development.

The explanatory text in section 4.4.1 includes (in similar wording to the policy for temporary public realm) the provision: "Parameters for any meanwhile use, particularly its longevity and associated obligations, should be established from the outset and agreed by all parties."

Meanwhile housing may be particularly suitable for housing people who have been homeless and in hostels as 'move on' accommodation. Residents in these homes are not usually given secure tenancies or even Assured Shorthold Tenancy terms, but are often given licenses,



similar to the terms under which property guardians occupy empty buildings. Any implementation of this policy should be careful that homes provided are not substandard and that they do not end up being long-term yet insecure homes for large numbers of Londoners.

Recommendation for policy H4

I recommend the Mayor produces further guidance on meanwhile housing and a model, adaptable set of terms and conditions for sites and requires that at least Assured Shorthold Tenancies are offered to potential residents.

H5 DELIVERING AFFORDABLE HOUSING

The figures from the SHMA on London's housing needs shown in table 4.1 define how overwhelmingly London needs new low-cost rented homes. Overall, 65 per cent of new homes provided need to be either low cost rent or intermediate tenures.

In August 2017, I highlighted that no social rented housing had started under Mayoral funding programmes since the Mayor was elected in May 2016.²²

The London Tenants' Federation outlines in its submission to the draft Housing Strategy that, between 2005 and 2015, London Plan targets for market homes were over-achieved at 124 per cent of targets, while only 53 per cent of targets for social and affordable rented homes were achieved.²³

In this plan period it is therefore even more crucial that requirements for the proportion of new homes provided under affordable tenures meets the need defined in the SHMA. This draft policy does not yet do this. Policy H5 (as well as policy H7 which covers the split between different affordable tenures) must be amended to fit the needs of Londoners, both in terms of the proportion of homes that are affordable and whether these are defined as gross targets for the eventual homes on a site or as a proportion of net gains.

Net vs gross

I argued in my response to the draft Housing Strategy that, in terms of meeting need, the net gain in low-cost rented homes is far more important than any gross measure for Londoners and Assembly Members who want to monitor the Mayor's progress.

In discussion with the Housing Committee, officers have confirmed that the percentages given in H5 are currently gross, saying: "The 50 per cent would be 50 per cent of the total number of homes in the planning application. This is a policy for a planning application".²⁴

Without a clearer and stronger policy here taking account of the potential loss of homes as part of applications, the Mayor is risking too many new housing developments being targeted at estates and areas with existing homes, while claiming to support the strategic goals of the plan.

Without planning requirements taking the loss of these existing homes into account, we could see far less actually new affordable housing being provided than if net measures were used here instead.

Proposed amendments to policy H5 (changes highlighted in bold):

H5 A – The strategic target is for **65** per cent of all **net** new homes delivered across London to be affordable.

H5 A (3) – affordable housing providers with



agreements with the Mayor delivering at least **65** per cent **of net new** affordable housing across their portfolio.

H5 A (4) – public sector land delivering at least **65** per cent **net new** affordable housing across its portfolio.

H5 A (5) – strategic partners with agreements with the Mayor aiming to deliver at least **65** per cent **net new** affordable housing across their portfolio.

Key performance indicators

The current London Plan key performance indicator (KPI) for affordable housing is given in net numerical gains. However, the draft London Plan has changed the relevant KPI to this gross measure: "Positive trend in percentage of planning approvals for housing that are affordable housing (based on a rolling average)." This also needs to be amended to enable progress towards net gains to be monitored and the Mayor held to account.

H6 THRESHOLD APPROACH TO APPLICATIONS

I continue to hold the view, given in my response to the draft Housing Strategy, that the threshold of 35 per cent may be too low, and that allowing for confidentiality within the Fast Track Route deprives Londoners of evidence that the policy could be even more effective.²⁵

There is already some evidence that supports making the threshold higher. We have seen that compliance so far has been better than expected, and the Deputy Mayor for Housing and Residential Development told the Housing Committee that developers were already building its requirements into the price they are paying for land. "Even before we had published the draft Supplementary Planning Guidance, we were hearing anecdotally that developers were putting in bids for land on the basis of delivering 35% affordable housing and so they had already priced that into their bids for land. That meant that the discussions or arguments further downstream around affordable housing were going to be reduced substantially because they had already factored that in when they were buying the land upfront."

James Murray, speaking to the Housing Committee, 23 Jan 2018

The threshold approach is therefore emerging as an effective nudge policy, with a positive result in just a short time of operation, and even beforehand. This suggests that an increase in the threshold is possible now within the policies in this plan, and that a clear direction of travel towards further increases over time would be effective if set out now.

Recommendation for policy H6

The supporting text for H6 should indicate that the 35 per cent threshold for the Fast Track Route for planning will be reviewed and that an upward trajectory is intended to be applied to it over time.

This would have the added benefit of incentivising developers to apply for permission for new developments sooner rather than later The policy in section C (4) also includes a review if developments are not progressed within two years of permission being granted, so this is also an incentive to build them once permission is granted.

However, it is not completely clear in this policy that schemes cannot seek to argue that 35 per cent of homes with some of these at the



Government's definition of affordable (at up to 80 per cent of market rates) will meet the criteria for the Fast Track Route. This possibility needs to be explicitly excluded, which could be done by making sure that the reference to compliance with policy H7 is to an amended H7 which excludes anything other than the Mayor's preferred affordable tenures – see my proposed amendment below.

H7 AFFORDABLE HOUSING TENURE

The type and split of affordable housing set out in this policy does not meet the needs of Londoners as set out in the SHMA, especially if this is not measured in terms of the net gain of homes.

Two major changes are needed to this policy: first to tighten up the definition of affordable, and remove the possibility that the Government's definition can be pressed upon boroughs by developers; and second to make sure the required mix of tenures is set out clearly in policy and not left for boroughs to fight for on their own.

Definition of affordable

In terms of the definition of affordable housing, I do not believe, as the Deputy Mayor for Housing and Residential Development told the Housing Committee in January 2018 that "The Mayor has given as strong a steer as possible within the national framework."²⁶

We have uniquely high private market rents in London. Rents here are nearly twice as high as the median for other regions of England (see the chart below, taken from evidence in the draft Housing Strategy). The impact of this runs right through the housing crisis, preventing Londoners saving for deposits and pushing many people into homelessness.

With rent inflation also outstripping wages, the case for defining housing affordability in London in terms of incomes not market rates is overwhelming.

My response to the draft Housing Strategy asked the Mayor to set a clear new definition of affordable for London, either by agreement with the Government or through well-



Average rents in London compared with the rest of England, 2016²⁷



evidenced and drafted London Plan policies. I suggested the following:²⁸

"Through the London Plan, we should define intermediate 'affordable' rent at a lower maximum proportion of the local market rate. This would still be compliant with the NPPF, as it would not be above 80 per cent, but there is enough evidence to convince an examiner of the validity of a policy that required a lower limit in London."

Response to the draft Housing Strategy

This plan should therefore, in policy, specifically exclude any tenures that are not in the Mayor's preferred definition from being able to qualify as 'affordable housing' except in very exceptional circumstances.

This could be achieved by moving the description of the Mayor's "preferred affordable housing tenures" in supporting text paragraph 4.7.3 into the policy box and being clear that these tenures are the only ones that will count towards affordable housing targets.

This would be entirely justified. Indeed, there are other ways in which this plan redefines for London aspects of national policy, where we have the evidence to support it. Supporting text 4.2.3 sets out how the definition of small sites used in the plan "differs from that used in Planning Practice Guidance and the definition of 'major development' in planning legislation."

I also echo the Assembly's response to this policy, and its concerns about potential loopholes.

The definition of what is affordable in the London Plan needs to be tightened, to ensure there is no ambiguity... The Mayor does not consider 80 per cent of market rent affordable.

However, the definition in the plan Glossary mirrors that in the National Planning Policy Framework, including rents at up to 80 per cent of market level (while also setting out the Mayor's *preferred* affordable tenures). Policy H7 of the draft plan deals with Affordable Housing Tenure, and says it will be for the boroughs to agree the tenure of 40 per cent of affordable homes arising through s106 agreements based on need and "provided they are consistent with the definition of affordable housing".

The supporting text in section 4.7.2 indicates a *presumption* that this 40 per cent will focus on social rent or the new London Affordable Rent. But it goes on to offer more flexibility, leaving it open for schemes to be proposed with a large proportion of 'affordable' homes at up to 80 per cent of market rent levels.

London Assembly response to the draft London Plan



Tenure split

Policy H7 A asks for a minimum of 30 per cent low-cost rented homes and 30 per cent intermediate products, and leaves a full 40 per cent of tenure requirements to be determined by the boroughs.

This is wrong. It leaves open the opportunity for developers to use their resources to put boroughs under pressure to accept much less than the 65 per cent of low cost rented homes needed by London, as set out in the SHMA, and risks boroughs weakening the definition of affordable by using tenures outside the preferred tenures of the Mayor.

Proposed amendments to policy H7 (changes highlighted in bold):

A The Mayor is committed to delivering genuinely affordable housing. The following split of affordable products should be applied to development:

- a minimum of 65 per cent low cost rented homes, allocated according to need and for Londoners on low incomes (Social Rent/ London Affordable Rent)
- (2) a minimum of **35** per cent intermediate products which meet the **Mayor's** preferred affordable housing tenures of definition of affordable housing, including London Living Rent and London Shared ownership
- (3) 40 per cent to be determined by the relevant borough based on identified need, provided they are consistent with the definition of affordable housing.

C The Mayor's preferred affordable housing tenures are defined as:

- London Affordable Rent
- London Living Rent

London Shared Ownership
Changes needed to supporting text:



4.7.3 – copy into the policy box as a new section and delete "Within the broad definition of affordable housing."

4.7.8 These income limits should be lower and be much closer to the average household incomes in London.

4.7.10 allows boroughs to set lower income limits, but says that London-wide criteria must apply after three months, and won't allow the policy to apply to relets. This section does not make sense when the policy itself leaves things up to boroughs, unless the intention is to allow for the 80 per cent of market rates definition to apply at this point. This seems to be indicated by paragraph 4.7.12, which explicitly allows for more homes that are less affordable to be allowed. These sections need to be rewritten as they lack clarity and in a strict interpretation allow far too many loopholes for developers to exploit.

London Living Rent

The London Living Rent is a good new definition of rent at a level that represents genuinely affordability in terms of a proportion of wages not market rates.

However, I am concerned about a drift in the application of this definition already. In Camden the council has set up its own housing company to rent out some of the new flats it is building on estates. These were promised at a 'Living Rent' but, now the first flats have gone out for renting, it's clear that these aren't following the Mayor's definition of a London Living Rent, especially not for families.

The family-size flats are being marketed to sharers, and I have asked the Mayor about this recently.²⁹ I believe that, in the London Plan and in his application of the definition of London Living Rent, the Mayor must be clear that family homes should be intended for the many London families in need of homes at a Living Rent and that the use of this term should mean rents provided that meet his definition.

The Mayor should also monitor the equalities impacts of this policy. He should study the characteristics of the initial occupants of London Living Rent homes and see if different types of families – particularly female headed households – have more trouble affording these rents.

More information is also needed about the fate of families whose incomes fall below the average, but who do not quality for social housing in their areas. The London Living Rent definition seeks to close a gap in the market but we need to be aware if gaps remain that will affect particular groups of Londoners.

H8 MONITORING OF AFFORDABLE HOUSING

The requirements of this policy need to be set out in more detail. Monitoring information provided by boroughs and reported in the London Development Database in a transparent way must include:

- The total amount and percentage of affordable housing for each development in gross and net terms
- The detailed split of affordable tenures for each development, and the amount and percentage of affordable homes at each tenure in net and gross terms
- The amount of money required and received in lieu of provision for any very small or exempt developments
- Details of rents charged and how these compare with previous rents when social rented homes are replaced as part of developments.

These requirements should be set out in



supporting text if not added to the policy box.

H10 REDEVELOPMENT OF EXISTING HOUSING AND ESTATE REGENERATION

The wording of this policy needs to be clearer that there is no lower limit to this policy, and that the loss of even one affordable home triggers the Viability Tested Route.

The Assembly Housing Committee discussed this policy in January 2018 and GLA officers were clear that this was the case. While a strict interpretation of the policy wording does allow for the policy to be applied to any development that is demolishing existing homes, it should be made clearer, with further clarification added to the supporting text.

Policy H10 B also does not include the requirement to replace affordable housing at equivalent tenures, and leaves open the definition of affordable, as mentioned in our response to policy H7, which should be amended to include the Mayor's preferred definitions. This policy should therefore be amended to be clear that only the Mayor's preferred tenures will count as affordable provision in estate regeneration schemes.

Proposed amendment to H10 B (changes emphasised in bold):

Where loss of **any units of** existing affordable housing is proposed, it should not be permitted unless it is replaced by equivalent or better quality accommodation, providing at least an equivalent level of affordable housing floorspace, and **generally** should produce an uplift in **affordable** housing provision **that meets the Mayor's preferred affordable tenures as set out in policy H7.** All such schemes are required to follow the

Viability Tested Route (see Policy H6 Threshold approach to applications).

Conversely, I believe that the definition of 'affordable homes' when being considered for demolition should include former right-to-buy properties on estates, particularly where they are owner occupied and the original former tenants still live in them. The Mayor, in his new Good Practice Guide to Estate Regeneration, recognises that these homes are often of a value that, even when fully compensated according to legislation, does not allow the former owners to buy in the local area. Therefore, demolishing these homes does represent the removal of an affordable option for these residents.

Similarly, rents being charged by absent landlords to private tenants of former right-tobuy flats are often significantly below market rates, such that if reprovided at the same rents they would qualify under at least the Government definition of affordable homes.

The removal of these affordable housing options for local people should be considered as a loss of affordability and so the viability tested route should be used whenever these kinds of homes are removed too.

The definition of 'demolition' also needs to be made clearer. A good example of the destruction of homes while the overall fabric of a building is retained is the recently abandoned 'Transformation' option for the Fred Wigg and John Walsh towers in Waltham Forest.

The Mayor's Good Practice Guide

I will be responding separately to the consultation on application of the Mayor's Good Practice Guide to Estate Regeneration and the new requirement for ballots to be held when demolition is proposed.³⁰ I believe that, both in planning and funding

City Hall Green Sian Berry AM decisions, ballots of residents should be held. While I recognise that a positive result in a ballot can only be made an absolute requirement of Mayoral funding decisions, ballots should still be held in all cases of demolition and their results given significant weight in planning decisions by the Mayor and local authorities.

The current version of the Good Practice Guide backs this general principle when it says: "The Mayor supports the principle of mandatory ballots as part of estate regeneration schemes where demolition is involved."

The application of the Mayor's Good Practice Guide therefore needs to be a firm requirement of policy in this plan, with ballots required to be held, and their results taken account of with significant weight, in all planning decisions.

The provisions of supporting text 4.10.3 should be moved into the policy box as a new part D, and amended as below.

New part D for policy H10, adapted from supporting text 4.10.3: (changes emphasised in bold)

D Any proposals that involve the demolition of existing social housing should **follow** the requirements of the Mayor's Good Practice Guide. **Ballots of residents should be** carried out according to the provisions of the Mayor's Capital Funding Guide whether or not Mayoral funding is involved, and the results should carry very significant weight in planning decisions.

Rents in replacement homes

The policy and supporting text need to give more clarity the level of rent required when social rented homes are replaced as part of regeneration. London Affordable Rent (LAR) is generally higher than the average social rent currently being charged. Combined with increased council tax and service charges in replacement homes, residents may face a significant increase in their overall housing costs in replacement homes.

Policy H10 C requires replacement "rents at levels based on that which has been lost." There is no further detail in the supporting text, but 4.3.10 asks that the principles of the Mayor's Good Practice Guide are followed.

However, in the Good Practice Guide, this same requirement is worded in a number of different ways:

- "affordable homes should at least be replaced on a like for like basis" (page 5)
- "homes based on the same rent levels" (page 15)
- "at the same or a similar level of rent, and with the same security of tenure" (page 17)
- "with rents at levels based on those of homes that have been lost" (page 22)

This gives no clarity at all to estate residents about what they should expect. The wording of H10 C needs to be clarified in supporting text to remedy this, ideally by specifying that rents, security of tenure, and overall housing costs including service charges will not be increased for existing residents whose homes are replaced during regeneration. H11 B which allow boroughs with identified problems with 'buy to leave' properties "to put in place mechanisms which seek to ensure stock is occupied."

In Towards a new London Plan, I made the proposal below and I am glad the Mayor has attempted to support these kinds of conditions in the draft new London Plan.

Policy H11 could be made stronger by specifying that one possible mechanism is lease conditions being required as part of planning agreements.

Prohibit 'buy-to-leave' for new builds

On the growing tendency for second homes and 'buy to leave' purchases in new developments, the new London Plan should require developers to apply lease conditions to the homes they build which make sure these are the primary residence of the new owners.

The need for new housing for Londoners is the basis of housing targets, and homes that are not lived in or used only infrequently do not contribute towards these goals, so a condition that newly-built homes should be lived in is justifiable. Those wishing to buy a second home in London will not be prohibited from buying older stock under this planning policy, but it will help to prevent waste in new housing supply from pure speculation.

Towards a new London Plan

H11 ENSURING THE BEST USE OF STOCK

I very much welcome this policy, in particular



H12 HOUSING SIZE MIX

Overcrowding remains a huge problem in London, which the policies in the draft London Plan do not appear to do enough to fix.

According to the Economic Evidence Base for London 2016, 11 per cent of private renting households, and 14 per cent of local authority renters, are overcrowded, compared with 2-4 per cent of owner-occupiers.³¹ The SHMA estimates that the number of 'concealed' family units (families sharing with others but who need their own homes) in London has risen from 400,000 in 1996 to 730,000 in 2017.

The overcrowding figures above are based on the bedroom standard, which is measured by the English Housing Survey. However, the current structure of the survey means that, although we can see a rolling average for London as a whole in the evidence cited above, data are no longer available on how many people are living in overcrowded conditions on a ward or borough basis.³²

This has already had an impact on the ability to track targets for improvements in overcrowding in the 2012 Games 'Growth Boroughs', as shown in the most recent Convergence Annual Reports.³³

The Mayor should not leave it up to boroughs to correct this gap in knowledge. He should gather consistent, ongoing evidence to monitor overcrowding on a borough and ward level, and amend this policy to restore targets for larger homes.

I echo the comments of the Assembly in its response to the draft London Plan and the amendments requested.

The plan needs to set targets for the development of larger homes and to alleviate overcrowding. The Mayor and London Councils should agree a common method for measuring overcrowding London-wide, enabling more accurate and more readily comparable data collection. The wording in para 4.12.3 needs further work to clarify that the Mayor is not condoning the overcrowding of families into unsuitable two-bed homes.

Policy H12D sets out a more detailed consideration of criteria to assess whether affordable housing meets identified local needs. We suggest that this level of consideration should also be made for market and intermediate homes.

> London Assembly response to the draft London Plan

H16 GYPSY AND TRAVELLER ACCOMMODATION

I welcome the clarification of the definition of Gypsies and Travellers set out in policy H16 B, and the addition in parts (2) and (3) of the following categories of need among those who are not currently travelling:

2) those who currently live in bricks and mortar dwelling households whose existing accommodation is unsuitable for them by virtue of their cultural preference not to live in bricks and mortar accommodation

3) those who, on grounds of their own or their family's or dependents' educational or health needs or old age, have ceased to travel temporarily or permanently

It has been argued in discussions I have attended with these groups that boroughs should assess need, but this is another area



where boroughs may not be able to do this in a timely way. It also contrasts with other areas of the plan where strategic, London-wide issues have been assessed by the GLA and targets set for boroughs, such as for small sites.

I support the calls from campaigners for borough targets for new Gypsy and Traveller sites to be set by the Mayor as part of the London Plan.

H17 PURPOSE-BUILT STUDENT ACCOMMODATION

I welcome this new policy, particularly H17 A (4) which calls for a proportion of affordable student homes. Supporting text also defines a level of student affordable rent, which I have called for in Mayor's Questions and supported campaigns by students.³⁴

Policy H17 A (4) asks for at least 35 per cent affordable student accommodation. This is defined in supplementary text paragraph 4.17.7 as "a rental cost for the academic year equal to or below 55 per cent of the maximum income that a new full-time student studying in London and living away from home could receive from the Government's maintenance loan for living costs for that academic year."

This seems like a high percentage of basic income, but more reasonable when allowing the ability of students to do at least some work to supplement this. Paid work during term time can be reasonable to expect, in moderation, and the Mayor has told me that it also takes into account the additional services often provided in student accommodation.³⁵ However, for some subjects of study, including many STEM subjects, longer hours of mandatory attendance at lectures, teaching and practical work is expected, with less ability to do paid jobs. Therefore, further work with the Mayor's Academic Forum should be carried out to encourage these issues are considered when higher education institutions are working up the allocation policies mentioned in section 4.17.11.



SOCIAL INFRASTRUCTURE, ECONOMY, HERITAGE AND CULTURE

It is vitally important that new services and facilities are created alongside new housing at the right time, so that the need to travel is reduced and so that communities grow sustainably with key services and opportunities for work within walking distance.

The overriding push for new housing, and the focus in the draft London Plan on fitting this into existing areas, particularly around town centres, means that solid policies are needed to make sure that other uses of land are not forgotten. Policies also need to make sure that mixed use developments are created in ways that work for everyone.

Chapters 5, 6, and 7 of the draft London Plan seek to do this, providing ways for communities to preserve their sense of place, heritage, and their local businesses and community facilities, while making improvements and adding new homes to their local areas.

I am pleased with many of these policies and their efforts to make the city more inclusive and healthier, and happy that the Healthy Streets principles are further embedded in this section of the draft Plan.

However, I propose some changes, particularly in the way the policies support smaller industrial sites and small businesses, and how they involve local communities.

SOCIAL INFRASTRUCTURE

S1 DEVELOPING LONDON'S SOCIAL INFRASTRUCTURE

Policy S1 B is the first policy in this draft Plan where Neighbourhood Planning is mentioned. This is presumably because the ability of Neighbourhood Forums to protect social infrastructure through nominating Assets of Community Value appears in statute. However, as stated in previous chapters, Neighbourhood Forums have a lot more to offer than just this.

Proposed amendment to S1

I am happy to see section 5.1.4 give firm support for communities wanting to protect social infrastructure with Asset of Community Value designations but this should be included in the policy box too.

S3 EDUCATION AND CHILDCARE FACILITIES

It is very good to see the provision of childcare facilities as well as schools included in these policies, including the requirement in part A that local needs and potential sites should be included in local plans.

I am also happy to see that this new draft removes the previous Plan's support for free schools.

However, S3 B (8) should include more to ensure the educational value of green spaces, wildlife habitats and food growing is included in



the requirements for outdoor space and facilities schools to which schools have access.

Proposed amendment to S3 (addition highlighted in bold):

S3 B (8) ensure that facilities incorporate suitable, accessible outdoor space, which includes green areas and space for food growing and other suitable outdoor educational activities.

S4 PLAY AND INFORMAL RECREATION

Policy S4 is a much improved policy, with an emphasis on the independence of children and young people, helping them to use public and play spaces without adult supervision, and encouraging design that allows for overlooking and informal community supervision.

Healthy Streets principles are included here too. For example, section 5.4.2 says: "developments should encourage children and young people to move around freely through safe streets and footpath networks."

However, while "trees and/or other forms of greenery" are specified in policy S4 B (2d), mere 'greenery' is still a potentially barren kind of environment for young people, and requirements should be made wherever possible for wildlife habitats and high quality biodiverse green space that is stimulating and educational for young people, as well as contributing to wellbeing.

Defining these spaces only in terms of 'play and informal recreation' seems to ignore the need for spaces that allow for informal practice and non-organised participation in sports. For larger developments, policies should specifically ask for flexible, free outdoor spaces suitable for self-organised sporting play.

'Poor playgrounds'

To make sure that the children of households in different tenures are not segregated by being given separate outdoor play provision with their housing, this policy should include a prohibition on separate 'poor playgrounds', matching the change I have proposed to policy D4.

S5 SPORTS AND RECREATION FACILITIES

The polices are reasonable, but some changes are needed.

There is an assumption that all the sporting facilities will be indoors. It's the subtext of policy S5 C, which balances provisions of sports facilities against open spaces, and nowhere does it currently say "indoor and outdoor sports." This wording should be included in the section on assessing need in policy S5 A (1).

Proposed amendment to policy S5 (addition highlighted in bold)

A 1) assessing the need for indoor and outdoor sports and recreation facilities at the local and sub-regional level using, for instance the widely-adopted Sport England's methodology for indoor and built facilities (Assessing Needs and Opportunities³⁶). This should include a requirement on in-depth community consultation.

Second, in policy S5 B (4) is not clear enough that the condition for the net loss of facilities "unless it can be demonstrated that there is no ongoing or future demand" should not just relate to the specific current use.

In my local ward, we have lost a sports venue that was used mainly for bowling after a



developer argued successfully on appeal that local policy allowing for loss of facilities that were no longer needed should be interpreted very narrowly to include only bowling itself, rather than any other sports. The area is in need of additional sporting facilities and the loss of this site was very concerning.

Policy S1 G is therefore helpful when it says: "Redundant social infrastructure should be considered for full or partial use as other forms of social infrastructure before alternative developments are considered," but this seems to assume the infrastructure is publicly owned and that strategic plans will look at these issues. The bowling club in question was privately owned, so more protection is needed in the case of individual sites.

There is also a cycle of decline in sports facilities, both green fields and hard courts, where underinvestment leads to under-use and this ultimately leads to the loss of those facilities. For example, currently the run-down ball courts on Shoreditch Park are due to be built upon despite open air ball courts being at a massive premium in this central London area. Policies need to be framed to address this problem and recognise that demand for sports is uniquely tied up with available facilities and often the presence of clubs that promote them locally.

Proposed amendment to S5 (addition highlighted in bold):

B (4) ensure that there is no net loss of facilities, unless it can be demonstrated that there is no ongoing or future demand for the current use or a local need for similar sport and recreation uses that could adopt or replace the facilities on the site. Measures should be taken to ensure demand is promoted through a local sports strategy before any loss is considered. Supporting text should also be amended to



add a requirement that, in making plans for sports facilities, developers should adequately engage with and consult local sports groups that use existing facilities or might use new ones.

S6 PUBLIC TOILETS

This is a very welcome new policy, which says large developments must include new public toilets and, in areas where there is a large amount of public realm, these must be open 24 hours.

However, there is nothing to protect existing public toilets which are often under threat, as they are largely owned by local authorities which find the running costs challenging.

The policy could do more to protect existing toilets or, alternatively, could ask for a levy as part of Section 106 agreements towards public toilet maintenance when significant new developments below the threshold of 'large' are proposed.

ECONOMY

E1 OFFICES

I welcome policies E1 F and G which encourage boroughs to bring in Article 4 directions to protect town centres and local office clusters from permitted development rights, and encourages the splitting up for larger offices into smaller units suitable for small businesses.

Part F should be extended to allow Neighbourhood Forums to nominate for protection smaller office clusters near to local centres, as these are often sources of affordable business space, close to homes, and so have potential for development as coworking hubs, which are particularly suitable for people who also work at home. The loss of spaces identified as valuable for local areas in this way should be avoided and Neighbourhood Forums are ideally placed to identify them.

E2 LOW-COST BUSINESS SPACE

This is a new policy, which is overall welcome. The Assembly's Economy Committee investigation into business space estimated that one fifth of traditional office space could be lost, particularly in outer London, as a result of the relaxation of planning rules.³⁷

The policy seeks to encourage low-cost business space but does not put any targets or numbers on this – just 'a proportion' – and it should be strengthened to require whatever proportion is identified as the strategic need across London for small-scale, affordable business space.

The protection of existing affordable space is better in the policy, but the clause on reprovision in policy E2 B (2) doesn't say that replacement space should be at a similarly low cost, merely that it should aim at "incorporating existing businesses where possible." This is way below the protection given by policies guaranteeing a right to return and equivalent rents for residents of affordable housing, and this policy should be improved.

Proposed amendments to Policy E2 (changes emphasised in bold):

B Development proposals that involve the loss of existing B1 space (including creative and artist studio space) in areas where there is an identified shortage of lower-cost space should:

 demonstrate that there is no reasonable prospect of the site being used for business purposes, or

- ensure that an equivalent amount of B1 space is re-provided in the proposal (which is appropriate in terms of cost, type, specification, use and size), incorporating existing businesses where
- demonstrate that suitable alternative accommodation (in terms of cost, type, specification, use and size) is available in reasonable proximity to the development proposal and, where existing businesses are affected, that they are subject to relocation support arrangements before the commencement of new development.

C Development proposals for new B1 business floorspace greater than 2,500 sqm (gross external area) should consider the scope to provide a proportion of ensure at least [xx] per cent of floorspace is flexible workspace-suitable for micro, small and medium-sized enterprises.

E3 AFFORDABLE WORKSPACE

Similar to E2, this policy sets out that some affordable workspace may be required in new developments, but says this can only be done "for a specific social, cultural or economic development purpose" and does not set any targets or proportions.

Further detail on what is to be protected is left for boroughs to decide via policy E3 C, which says: "Boroughs, in their Development Plans, are encouraged to consider more detailed affordable workspace policies in light of local evidence of need and viability. These may include policies on site-specific locations, or defining areas of need for certain kinds of affordable workspace."

This policy partly reflects a policy I asked for in Towards a new London Plan as it allows


boroughs to protect clusters of distinctive businesses and our emerging heritage. However, it is not clear how well-resourced boroughs will be to assess the need for this more widely to provide for strategic needs across boroughs.

Protect our emerging heritage

Some boroughs are already seeking to protect distinctive localities or clusters of businesses, such as long-established and traditional retail and food and drink outlets, within their areas.

Many of these clusters have significance across London, not just in their area, for example a number of groups of longstanding LGBT businesses, and places such as Chinatown, Brixton, Elephant and Castle, Seven Sisters, Denmark Street and Brick Lane with significance for particular ethnic or cultural groups. These areas of 'emerging heritage' form a key part of London's character as a diverse, cohesive, tolerant and global city but are rarely old enough for official heritage protection, especially as their traditions often depend more on custom and usage than physical features.

The London Plan should seek to encourage and build upon the efforts of boroughs by defining areas of 'emerging heritage' that have local distinctiveness and a Londonwide significance. These should be given similar protections to conservation areas, with a statement of what characterises the area's distinctiveness, support to preserve and enhance its unique characteristics and protection against changes of business use away from what has become traditional.

Towards a new London Plan

Policy E3 should be amended to include



more guidance for boroughs on a suitable target proportion of affordable workspace in all new developments above a certain size to match the similar amendment I have requested to policy E2.

E4 LAND FOR INDUSTRY, LOGISTICS AND SERVICES AND E5 STRATEGIC INDUSTRIAL LOCATIONS AND E6 LOCALLY SIGNIFICANT INDUSTRIAL SITES

These policies are an improvement on the current London Plan, which led to a huge loss of industrial space.

Work by former Assembly Member Jenny Jones showed that the previous Mayor's infrastructure plans set projections of employment that involved manufacturing jobs falling to just 15,500 by 2050 – a trend that would lead to manufacturing disappearing completely from London by 2062.38 London Plan monitoring reports show that, from 2006-13, almost 604 hectares of industrial land were lost, more than double the target.

There is now a new target for 'no net loss' across London, and areas that are redeveloped near town centres are encouraged to become mixed areas.

Table 6.2 that lists areas where capacity should be either maintained, released or provided. Central London now largely has 'retain' as its category which is an improvement on what was trailed in A City for all Londoners, which said: "In some areas, industrial land may be surplus to current needs and could be better used for housing. It may be possible to relocate industry to other areas of the city without disrupting the economy or eroding the critical base of industrial land."

I am concerned, however, that these improved protections, including the 'no net loss' requirements and the policies to retain space for industry in central London, are applied in the wording of the policies only to designated land, not the many smaller scale areas of industrial activity that are vital to London's economy. This must be changed.

The policies make a shift from defining industrial space only as land, to a more practical definition of capacity, defined as floorspace and operational space. However, some tidying up of the policies is needed before this shift is entirely clear.

I also believe there may be a conflict between encouraging rail transport for industry in E4 D (1) and part E, which encourages development on industrial land in places well served by public transport.

I have set out below some changes needed to these policies, and supporting text for these policies should also be amended to match.

Finally, the plan needs to include detailed maps showing the baseline provision to which the 'no net loss' policy will apply.

Proposed amendments to policy E4 (changes highlighted in bold)

To part A add a further section: 10. Building material supply and equipment hire and servicing uses

Add a new paragraph at the end of part A: Boroughs should carefully audit industrial activity and map industrial accommodation across their area, and in their Development Plans should clarify the planning status of



Amend part C (changes highlighted in bold):

The retention and provision of industrial capacity across the three categories of industrial land set out in part B, **and on smaller industrial sites elsewhere,** should be planned, monitored and managed, having regard to the industrial property market area and borough-level categorisations in Figure 6.1 and Table 6.2. This should ensure that in overall terms across London there is no net loss of industrial floorspace capacity (and **measured to include** operational yard space capacity) within designated SIL, and LSIS **and non-designated industrial sites**.

Proposed amendments to policy E5

Alteration to part A (changes highlighted in bold):

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

Delete from part D:

This release must be carried out through a planning framework or Development Plan document review process and adopted as policy in a Development Plan-or as part of a co-ordinated masterplanning process in collaboration with the GLA and relevant borough.



E7 INTENSIFICATION, CO-LOCATION, ETC

This is a new policy, which overlaps with the housing policies in the way it sets out goals for development around town centres and the overall new direction of London's spatial planning.

E7 C and D set out a new strategic goal of colocation and more mixed-use areas. The policies ask for boroughs to be 'proactive' and work out whether some areas could be intensified to release land without losing industrial floorspace when they are near town centres. Everything must be 'plan-led', which is potentially a positive approach, and some diagrams are included to show examples of how mixed developments could be phased to support industry continuously while intensifying the use of land to allow for new housing.

Overall we welcome these policies, but some changes are needed to make sure that local communities and existing businesses are fully involved, and that separate masterplanning processes are not encouraged to take the place of local development plans.

Similar to the design policies, this section is quite technocratic, and does not include many references to how the local community will be involved in making these plans, as well as existing businesses in the area.

Just because an area is currently industrial land doesn't mean local Neighbourhood Forums shouldn't be working closely with businesses on how to develop it. Camley Street Sustainability Zone is a good example of where an industrial estate has put together a viable plan for intensification, thanks to businesses and local people working together in a Neighbourhood Forum structure.³⁹ Another example of local people taking the lead is the amount of thought the two Neighbourhood Forums around the industrial land north of Kentish Town Station (which is a new SAR in the plan) have put in already as to how this area might be developed for the benefit of businesses and the local community. Camden Council is now developing supplementary planning documents and is looking closely at what the forums have proposed as a starting point for this work.

Proposed amendment to E7 (changes highlighted in bold)

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

C This approach should only be considered as part of a plan-led process of LSIS intensification and consolidation (and clearly defined in Development Plan policies maps) or as part of supported by a coordinated masterplanning process in collaboration with the GLA and relevant borough, which closely involved relevant businesses and the local community, and not through ad hoc planning applications.

E8 SECTOR GROWTH OPPORTUNITES AND CLUSTERS

I support the wording of E8 C, which asks for flexible, start up space and affordable spaces, though see my comments above on the policies that pursue more detail on this.



Exhibition industry

It is disappointing to see no mention of the exhibition industry in the policies in the draft London Plan. Trade and consumer shows are a vital part of our economy. This sector serves as a shopfront for a range of economic sectors important to our city, bringing people to London to make connections and supporting local businesses around our exhibition spaces as well.

Recently, 30 per cent of London's exhibition space was lost with the demolition of the Earls Court Exhibition Centre⁴⁰, and this has not been replaced in the new plans. Recent figures from the Association of Event Organisers show a 4% growth in their industry.⁴¹

Supporting a low-carbon economy

The low-carbon economy is recognised in supporting text paragraph 6.8.3 as a sectorspecific opportunity that requires a more targeted approach as the Mayor "believes there are specific business growth opportunities."

However, the policies should go further, by including the estimated number of jobs needed by sub-sector within the low-carbon economy to achieve the environment goals in in the Mayor's draft Environment Strategy.

The Environment Committee estimated that low-carbon economy could create 12,000 new jobs by 2030, provide £7 billion net benefits to London's economy and put London on track to become carbon neutral.⁴² I also propose a new policy as part H of E8.

Proposed additions to policy E8

New sections:

H To achieve the Mayor's recycling, zerocarbon city and other environment targets, the Mayor must ensure that the low-carbon sectors (reuse, recycling, circular economy, solar and renewables, retrofit and climate resilience) have the skills, resources and adequate support to deliver these goals.

I Boroughs and the Mayor will support plans to retain, refurbish and expand London's exhibition space.

E9 RETAIL, MARKETS AND HOT FOOD TAKEAWAYS

With one in three children obese or overweight, efforts to tackle this public health crisis are undermined by the availability of junk food and concentration of fast food takeaways. Research by Sustain shows the concentration of fast food takeaways has risen by 67 per cent near schools with one in four within a fiveminute walk of a school.⁴³

Policy E9 C proposes a new restriction on fast food takeaways where they are within a 400 metre walking distance of an existing or proposed primary or secondary school. This is very welcome. However, I would like to see a further policy that also prevents new outdoor advertising space in these locations.

Proposed amendment to Policy E9

New section:

G To prevent additional advertising of fast food and unhealthy snacks to children, new outdoor advertising spaces should not be approved if they are within a 400 metre walking distance of an existing or proposed primary or secondary school.



HERITAGE AND CULTURE

HC5 SUPPORTING LONDON'S CULTURE AND CREATIVE INDUSTRIES

I welcome the Mayor's decision to identify cultural and creative industries as one of the sectors he has pledged to promote and support, as well as policies to identify Creative Enterprise Zones

However, currently the Mayor is pushing ahead with the demolition of Vittoria Wharf, the lowcost creative workspace that makes up one of the densest concentration of artist studios in Europe.

The Mayor says that the amount of creative workspace in the Hackney Wick Masterplan will remain the same. However, research shows that only 10 per cent of the currently occupied low-cost studio space will be retained.⁴⁴

This is an example of bad regeneration on a scheme that the Mayor currently has control over. To prevent this in future, the policy should be amended to more clearly identify the existing businesses on sites as part of CEZs. This was recommended by the Regeneration Committee in its report Creative Tensions in March 2017.⁴⁵

Proposed amendment to HC5 C, adding a new part 1:

Where a Creative Enterprise Zone has been identified a comprehensive audit of existing businesses and jobs is undertaken and that they are fully involved in developing these areas.

HC6 SUPPORTING THE NIGHT-TIME ECONOMY

I welcome the inclusion of this new policy, which takes a strategic approach to developing the future night-time economy of London.

The night-time economy is a key driver of London's economic and cultural activity, employing hundreds of thousands of people and contributing around £5 billion to London's economy each year.⁴⁶

To improve this policy further, I support the following comments and changes that have been put forward by the London Assembly:

Policy HC6 A A strategic overview will be vital to ensure coherence across London's NTE as it develops.

Policy HC6 B should be a requirement for boroughs to consider a dedicated space to regularly showcase and celebrate new artists and musicians.

Policy HC6 B inclusive access and safety. To consider the option for developing a 'gold standard' for easy access for disabled people for how venues and events are managed and run.

Policy HC6B diversify the range of nighttime activities. For instance exhibitions spread around the town centre to encourage visitors to explore the area beyond their original destination and hopefully encounter new businesses along the way.

Policy HC6B protect and support evening and night-time cultural venues. Dedicated "anchor venues" are needed, to regularly showcase and celebrate new artists and musicians. But finding such spaces may well be an issue for many boroughs as music



venues continue to decline. GLA estimates indicate that 40 per cent of music venues have been lost across London since 2007. The Committee heard that in Croydon, for example, there is no such space, although some capacity is provided through Boxpark Croydon.



CHAPTER 8 – GREEN INFRASTRUCTURE AND NATURAL ENVIRONMENT

The draft London Plan takes steps for the continued protection of London's Green Belt and Metropolitan Open Land, but it is not strong enough on protecting the full range of green spaces, putting at risk targets for making London 50 per cent green, and threatening biodiversity.

G1 GREEN INFRASTRUCTURE

The continued protection for Metropolitan Open Land and Green Belt is welcome, as is policy G1 B requiring boroughs to make green infrastructure strategies. However, policies for new housing, small sites and higher development densities will all put additional pressure on green spaces. Additional safeguards are required from the policies throughout this plan if we are to meet the target for 50 per cent green space.

Green infrastructure not only helps with flood management as indicated in G1 B, but also in reducing urban heat island effect. This should be included as one of the borough objectives.

Proposed amendment to policy G1 (change highlighted in bold):

B Boroughs should prepare green infrastructure strategies that integrate objectives relating to open space provision, biodiversity conservation, flood **and heatwave** management, health and wellbeing, **learning and development,** sport and recreation.

G2 LONDON'S GREEN BELT

This policy follows what I proposed in Towards a new London Plan. The need to develop first inside London's boundaries underpins the rest of the spatial development strategy and is the right choice.

"We have sufficient land supply to resist any premature changes to current Green Belt designations. With an uncertain future in terms of economics and immigration (the major driver of population change in London) the wisest policy is to strengthen these protections to ensure that the best possible use is made of brownfield land, infill and densification over the period of this plan."

Towards a new London Plan

The wording of policy G2 B should be reinforced to include a strong presumption against the alteration of Green Belt boundaries which reduces its extent. I support CPRE London's proposed new wording with our proposed amendment below.

Proposed amendment to policy G2 (change highlighted in bold):

B The extension of the Green Belt will be supported and its de-designation will not. We will enforce a presumption against the loss of Green Belt.



G3 METROPOLITAN OPEN LAND

I am concerned about the potential for Metropolitan Open Land (MOL) swaps within policy G3 and supporting text paragraph 8.3.2.

The location of MOL is important, and existing MOL is often located in areas where large areas of green space are very deficient.

Proposed amendments to policy G3

Policy G3 B sould be amended to read: The extension of MOL designations should be supported where appropriate, **through the Local Plan process.**

Policy G3 C should be deleted along with this sentence in paragraph 8.3.2: "The principle of land swaps could be applied to MOL where the resulting MOL meets at least one of the criteria set out in part D of this policy."

If not deleted then the policy should specify that any replacement must be of better quality (rather than "equivalent or better") and with a preference for contiguous not just nearby reprovision.

Policy G3 D (2) should be amended to include **"learning and development"** among the benefits and uses of MOL.

G4 LOCAL GREEN AND OPEN SPACE

Overall in this draft London Plan, there is not enough protection for all local small green open spaces.

While I recognise the need for intensification of land use in London, including the use of small sites for housing, this policy is not adequate to prevent excessive damage being caused by infill



development and building over gardens and a proper method of balancing harms and benefits is not set out. Without more clarity in how to prevent unacceptable harm to green and open spaces, many undesignated spaces will be under unnecessary threat.

In the design chapter and the small sites housing policies there is no reference to protecting green space or gardens. See my comments on policy H2 and chapter 3, and my proposals for a sequential test to protect green space if alternative ways of increasing housing units are feasible.

As there is a heavy burden on policy G4 to protect against damage to gardens and smaller open spaces from other policies, it needs strengthening.

Proposed amendments to policy G4 (changes highlighted in bold):

A Local green and open spaces should be protected. This should be extended to all open spaces categories in Table 8.1, including pockets parks and linear open spaces. This protection should also apply to public and private gardens.

The parts of policy G4 that resist the loss of green open spaces in areas of deficiency are again too weak and will undermine the Mayor's policies to address this deficiency. Policies G4 C, which sets out requirements for boroughs, and G4 E (1) for development plans and opportunity areas, should include a requirement to assess the quality of spaces and their accessibility, not just quantity. The policy should also include requirements to improve the quality of spaces wherever possible.

Table 8.1, which describes the different categories of public open space, needs to be revised to reflect the importance of quality green space and gain a better understanding of its value through Natural Capital Accounting. The description section of this table should reference food growing and air quality among the range of benefits.

Further proposed amendments to policy G4 (changes highlighted in bold):

C Boroughs should undertake a needs assessment of local green and open space to inform policy. Assessments should identify areas of public green and open space deficiency, using the categorisation set out in Table 8.1 as a benchmark for all the different types required. The assessment should include the quality and accessibility of green and open space.

G4 E (1) include appropriate designations and policies for the protection of green and open space to address deficiencies **and improve quality and accessibility.**

G5 URBAN GREENING

A number of cities have successfully adopted a 'green space factor' to encourage more and better urban greening. The Mayor has developed a generic Urban Greening Factor (UGF) model to assist boroughs and developers in determining the appropriate provision of urban greening for new developments. To avoid it being applied to just major development, as set out in G5 A, it should apply to all sizes of development.

G5 A should also require the UGF to reflect existing biodiversity action plans and local green infrastructure strategies.

I have commented in the housing chapter on the way supporting text 4.2.9 does not guarantee the replacement of the benefits of green space by asking only for green roofs and sustainable urban drainage and new off-site trees. To support the changes, I have proposed



to that chapter, here the Urban Greening Factor of 0.4 for residential developments should be increased to 0.8 in Table 8.2.

Small developments are also not subject to the new Urban Greening Factor requirements in policy G5, which apply to larger developments and the policy should be amended to include all developments.

There is also a risk that it will be used by developers to reduce the amount and quality of green space available for the public. Policy G5 should have a further section added to guard against this.

Proposed amendments to policy G5 (changes highlighted in bold)

A Major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, **by including measures that reflect existing biodiversity action plans and local green infrastructure strategies**, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.

New section C:

C Urban greening required in new developments will be additional to green and open space as set out in policy G4.

G6 BIODIVERSITY AND ACCESS TO NATURE

Policy G6 supports the protection of Sites of Importance for Nature Conservation (SINCs) with the greatest protection for the most significant sites. All types of SINCs should be added to the categories of planning applications that must be referred to the Mayor. Policy G6 should include a new part F that makes this clear.

Proposed amendments to policy G6 (changes highlighted in bold):

B (1) use the relevant procedures to identify SINCs and green **ecological** corridors.

D Biodiversity enhancement should be considered from the start of the development process, and all new developments should seek to enhance biodiversity.

New section F:

F The value of gardens, allotments and pasture in providing biodiversity and access to nature should be recognised in all proposals and local decisions.

The current London Plan policy 7.19 C says development proposals should assist in achieving targets in biodiversity action plans (BAPs) and should not have adverse impacts on species of habitats identified. The proposed new draft plan removes references to BAPs and the replacement "borough green infrastructure strategies" are not as strong a policy. This should also be rectified.

Strategic issues and biodiversity

Policy G6 (and/or policy G4) needs to include appropriate references to the Environment Strategy and the forthcoming SPG on the All London Green Grid to ensure these policies have force.

The London Assembly Planning committee heard from the London Wildlife Trusts that loss



G7 TREES AND WOODLANDS

Inappropriate tree felling and hedgerow removal is a growing problem and these London Plan policies need to be stronger and clearer to protect them and demonstrate the benefits they provide. Planting new trees is never an adequate response to the loss of existing mature trees or hedges whose contribution to environmental quality will invariably take decades to replace.

Policy G7 A should be amended to acknowledge the benefits of mature trees and hedgerows in terms of biodiversity, air quality, soil water retention and natural cooling properties.

I support the Mayor's aim of increasing tree cover in London stated in para 8.7.2. However, the Mayor needs to provide the evidence base to demonstrate his target (increase tree cover in London by 10 per cent by 2050) and that it is adequate to cope with climate change impacts.

There are no area-based tree-planting targets, particularly on industrial, large brownfield sites, or in central London and other built up locations that are subject to the worst impacts of the heat island effect. Particularly as large canopy trees provide natural shade and cooling and should be central to the Mayor's programmes to improve London's resilience to heatwaves, which this policy acknowledges,

Policy G7 should therefore require significant areas of canopy cover in new developments, not just numbers of trees.

The policy should also require that utility works on large sites are planned and implemented in



a way that allows for the maximum number of new trees and space for large trees to grow. Designs for trunking and enclosures for utilities should make sure they are protected from tree root growth so healthy mature trees do not come under threat in future.

Protecting veteran and ancient woodland

Veteran trees and ancient woodland should be given the strongest possible protection in policy G7 B, with all ancient woodland planning applications referred to the Mayor. Policy G7 C, which is the replacement policy for tree removal, should also require 'equivalent', rather than 'adequate' replacement.

Fruit trees and orchards

To increase the support for planting fruit trees and orchards, G7 D (2) that supports opportunities for tree planting in strategic locations, community orchards on open space, and individual trees that produce nuts and fruit as part of forest gardens should be added.

Hedgerows

The value of mature hedgerows should be recognised by boroughs in development plans, and the policy should also ask for this.

Proposed amendments to policy G7 (changes highlighted in bold):

B (1) protect give strongest protection to 'veteran' trees and, ancient woodland and mature hedgerows where these are not already part of a protected site

B (2) identify opportunities for **significant** tree planting and **tree canopy cover** in strategic locations, **including community orchards and forest gardens.**

G8 FOOD GROWING

There is a compelling case that food security should be a priority for the new London Plan.

The Assembly highlighted in 2010 that London is very dependent on food imports and has only three or four days of food stocks available if there is disruption to supply.⁴⁸ Despite this much of the agricultural land around London – around 15 per cent of total area, mostly in the Green Belt – is not actively farmed.

A new policy is needed to ensure that land for community gardening and commercial food growing is developed in a manner that protects and enhances the soil, provides sustainable drainage and improves biodiversity. Land uses that provide these functions should be prioritised, particularly within the Green Belt.

Proposed amendments to Policy G8 (changes highlighted in bold)

A (1) protect existing allotments, **urban farms and community growing spaces** and encourage provision of space for community gardening, including for food growing, within new **and existing** developments.

A (2) identify potential sites, **including within developments**, that could be used for commercial **and community** food production.

New part: A (3) protect 'best and most versatile farmland' from development.

New section:

B Growing more food for London's food security should be one of the most beneficial and productive uses in the Green Belt.



CHAPTER 9 – SUSTAINABLE INFRASTRUCTURE

These policies are an improvement in many ways on the current London Plan, particularly as the air pollution plans here seek to be more effective than those of the previous Mayor. However, even these policies do not have enough ambition, and our amendments to this chapter will make sure we stick to our legal obligations to give everyone clean air to breathe in the shortest possible time.

These policies and targets also fail to convey the deep carbon cuts that are required to stabilise London's carbon emissions to tackle climate change. This complacency is further manifested by the omission of a single reference to the Paris Climate Change agreement in the entire draft London Plan.

SI1 IMPROVING AIR QUALITY

Figure 9.1, reproduced below, shows quite clearly that many of London's Air Quality Focus Areas (AQFAs) are outside of the Mayor's proposed new inner London Ultra Low Emission Zone (ULEZ) for all vehicles, which is set to start in 2021.

AQFAs are areas that not only exceed EU annual mean limit value for nitrogen dioxide (NO₂), but are also locations with high human exposure. These are often associated with London's most deprived neighbourhoods, as described in paragraph 9.1.1, and people who are most vulnerable to the impacts of filthy air.



Figure 9.1 – London's Air Quality Focus Areas



Policy SI1 A should be amended to make clear that the goal of the policy is that no-one in London misses out on clean air, and to ensure the policy matches both our legal obligations and the best medical evidence on particulate matter pollution.

Proposed amendment to policy SI1 A (changes highlighted in bold)

London's air quality should be significantly improved and exposure to poor air quality, especially for vulnerable people, should be reduced as quickly as possible. All areas of London need to meet nitrogen dioxide (NO₂) limits and World Health Organisation guidelines for particulate matter (PM_{2.5}) in the shortest possible time.

We are pleased to see the Air Quality Positive requirement being applied to central London. This is described in paragraph 9.1.3 and reduces air pollution through measures such as low or zero emission heating and better public transport.

However, policy SI1 A (3) should be amended to specify that all development proposals in AQFAs should also require this.

To cut emissions from domestic gas boilers, SI1 A needs an additional numbered section specifying that zero-emission heating technologies are preferred. This should also include gas-free development where electricity is the only power source.

Further proposed amendments to policy SI1 (changes highlighted in bold)

A (2) Development proposals should use design solutions to prevent or minimise increased exposure

A (3) should be amended to specify **that all development proposals in Air Quality Focus**



Areas should require an Air Quality Positive approach.

New section:

A (7) All new developments should be required to install the maximum on-site solar PV/thermal, air /ground source heat pump capacity (or other appropriate low or zero emission technologies) to prevent new sources of pollution.

SI2 MINIMISING GREENHOUSE GAS EMISSIONS

Policy SI2 is a revised version of policy 5.2 in the current London Plan. However, current policy 5.1 on climate change mitigation is not included in the draft London Plan and there is no longer a target for an overall reduction in London's carbon dioxide emissions of 60 per cent (below 1990 levels) by 2025.

The Mayor's aspiration of London becoming a zero-carbon city by 2050 is welcome. However, the most important target is what is achieved much earlier – by 2025. It is essential that this target is restored in policy SI2 and, if necessary, revised so it is consistent with the Paris Climate Change agreement.

Building energy-efficient homes

The Mayor's zero carbon target is defined as a minimum on-site reduction of at least 35 per cent beyond the national requirement of Building Regulations in major developments. However this is clearly not zero emissions. Policies and guidance should aim for the achievement of zero carbon standards to be done within the fabric and operation of the buildings themselves, with incentives given to avoid offsite 'offsetting'. Policy SI2 should be amended to include a new policy specifying that boroughs should give high priority to development plans and planning decisions for zero carbon and ultra-low energy buildings, such as Passivhaus, that require little energy for space heating or cooling.

Net zero carbon standards for smaller developments

Policy SI2 applies to major developments and there is no requirement for small developments to go beyond the national requirements of Part L of the Building Regulations, which is out of date and inadequate. To prevent thousands of inadequately built small developments that will require costly energy-efficient retrofits in the future, the Mayor should lobby the Government to update Part L of the Building Regulations and take the lead with Londonspecific efficiency standards.

Meanwhile, the Plan should extend policy SI2 A to apply net-zero carbon requirements not just to major developments but to all significant proposals, down at least to the level of the Mayor's newly-defined small sites.

Reducing performance gaps

Policy SI2 should be amended to include a new policy for reducing performance gaps. This will require a post-occupancy evaluation condition. Where developments fail to comply with agreed energy-saving targets, they will be required to comply with offsetting procedures set out in policy SI2 (C) and (D).

Maximising on-site renewables

Policy SI2 A (3) supports renewable on-site renewable energy. However, this should be strengthened to require maximum deployment potential, built in right from the design stage. Policy SI2 should also be amended to prevent



developers from overusing offset funds to avoid the "be green: use renewable energy" element of the energy hierarchy shown in figure 9.2.

Planning guidance on sustainable design and construction

Paragraph 9.2.10 says that the Mayor "may" publish further planning guidance on sustainable design and construction. This is unambitious and weak and exactly what the industry does not need. This language must be firmed up and text included in the policy box.

Including an SPG for Sustainable Design and Construction firmly in policy will alert developers and designers to the expectation that sustainability must be built into all designs, and ensure this SPG has status and is material in planning considerations.

Amendment to Policy SI2

New section:

E The Mayor will publish further planning guidance (SPG) on his Sustainable Design and Construction and will continue to regularly update the guidance on preparing energy strategies for major development.

Redevelopment and embodied carbon

Amendment to Policy SI2

New section:

F Boroughs and developers must assess the embodied carbon for regeneration proposals and give priority to retrofit and alterations over demolition.

Home retrofit targets

The Mayor's draft Environment Strategy says that 100,000 homes will need to be retrofitted with energy efficiency technologies each year to meet the target of zero emissions by 2050. Yet, there is no longer a policy or reference to retrofitting in contrast to the current London Plan policy 5.4. This serious omission needs to be rectified by restoring this retrofit policy.

SI3 ENERGY INFRASTRUCTURE

Energy supplies will struggle to meet demand from London's growing population, the switch to hybrid, electric vehicles and the charging infrastructure that will be needed.

Policy SI3 focuses solely on energy master plans for large-scale development. As a major theme of the new London Plan is to promote development on small sites, it is crucial that similar energy plans are extended to all size of developments.

The Environment Committee report, Bring me Sunshine, estimated that half the rooftops in London could be suitable for solar PV panels and that London has the potential to meet a fifth of its electricity needs from solar.⁴⁹

Less than half a per cent of the city's three million homes generate solar power and those provide one per cent of London's electricity needs. To remedy this, every development approved by the Mayor should be required to fit the maximum possible on-site solar panel capacity in both new build homes and offices.

Addition to Policy SI3

New section:

E Boroughs establishing their future energy



SI4 MANAGING HEAT RISK

London has been lucky to escape the worst effects of climate change, such as serious heatwaves, in recent years. However, expected temperature rises in London mean heat-related deaths, overheating in our homes and workplaces, and disruption of our transport unless preventive action is taken.

The new London Plan needs to identify locations where the Mayor's tree programmes will mitigate these risks with canopy cover. For instance, in central London locations where residents and businesses need far more tree canopy cover for shading, cooling and the natural air conditioning it provides.

Proposed amendment to SI4 (changes highlighted in bold)

B Major development proposals **and small sites** should demonstrate through an energy strategy how they will reduce the potential for overheating and reliance on air conditioning systems in accordance with the following cooling hierarchy.

New section:

C All development proposals need to incorporate the maximum amount of tree canopy cover for natural cooling and ventilation during heatwaves.



SI5 WATER INFRASTRUCTURE

The South East of England is densely populated and has a low rainfall level per head of population, so water supply will be a huge challenge. By 2020, Thames Water expects that demand will outstrip supply resulting in a shortfall of 133 million litres per day and, by 2040, a 414 million litre shortfall. Extracting more water from river and ground sources will not be an option for addressing this without causing damage to the environment.

London will need a significant new major water source. The Mayor needs to consider the most sustainable appropriate option set out in 9.5.4 and to ensure that Londoners will be protected from any disproportionate costs.

I support the proposal in paragraph 9.5.12 to integrate water management strategies (IWMS) for developments where flood risk and water related constraints such as a limited sewer capacity require an integrated approach to collectively manage all flood risks on the site with green infrastructure and storage tanks for instance.

Proposed amendment to SI5

Add new section:

Integrated water management strategies should be included within SI5 to ensure it has status and is material in planning considerations.

However, this approach should not just be applied to major developments such as opportunity areas, but all size of developments and small sites the Mayor wants to intensify in H2 and which should be considered at the first stage of development.

The new London Plan should go further requiring Code Level 5 for Sustainable Homes for water consumption.



Proposed amendment to SI5 (changes highlighted in bold):

C (1) minimise the use of mains water in line with the Optional Requirement of the Building Regulations (residential development), achieving mains water consumption of 105 litres or less per head per day. Where possible, Sustainable Code Level 5 of 80 litres per head per day should be applied to all size of developments.

SI7 REDUCING WASTE AND SUPPORTING THE CIRCULAR ECONOMY

Adopting the circular economy model will reduce the amount of waste generated, minimise the depletion of natural resources and reduce our carbon emissions, and will also create new job opportunities and boost London's economic activity. Huge potential benefits were identified by the Assembly Environment Committee in its recent study of these issues:⁵⁰

- Reducing 60 per cent of London's waste by 2041
- Putting London 'on track' to become carbon-neutral
- Creating 12,000 new jobs by 2030
- Giving £7 billion net benefit to London's economy

Amendment to policy SI7

Add new part C:

C Procurement associated with new development should also support waste minimisation and circular economy principles. This should be enforced through construction management processes and planning conditions where possible. The draft London Plan municipal waste recycling target of 65 per cent by 2030 is totally unambitious compared to the previous London Plan target of exceeding 50 per cent of all local authority collected waste being recycled or composted by 2020.

Furthermore, the Mayor's draft Environment Strategy has delayed this 50 per cent target to 2025. This is too little, too late and, as an interim target, is not even mentioned in the draft London Plan. This must be restored to speed up action on this issue.

Sufficient recycling storage internally to comply with local recycling separation is an essential factor in successful recycling, especially in flats.

Too much recyclable and compostable waste continues to be sent to waste-to-energy incinerators and needs to be reduced.

Proposed amendments to policy SI7 (changes highlighted in bold)

A (4) a) municipal waste – 65 per cent by 2030-65 per cent by 2025

A new target also needs to be developed for zero biodegradable or recyclable waste to waste-to-energy incinerators.

B referable applications should must promote circular economy outcomes and aim to be net zero-waste.

Add new section:

C Only genuine 'residual waste', the element that can't be recycled or composted, should be used in energy from waste incinerators.

SI8 WASTE CAPACITY AND NET WASTE SELF SUFFICIENCY

The Assembly Environment Committee has been reassured by the GLA that London has sufficient waste-to-energy incinerator capacity to handle all its residual waste, but is still short of recycling and anaerobic digestion capacity.

To rule out any further waste-to-energy proposals from going ahead and help boost more sustainable forms of waste management such as anaerobic digestion and more recycling capacity, SI8 need to be strengthened.

Proposed amendment to policy SI8 C (changes highlighted in bold)

(3) contribute towards renewable energy generation, especially renewable gas technologies from organic/biomass waste

(4) provide combined heat and power and/or combined cooling heat and power



CHAPTER 10 – TRANSPORT

The draft London Plan takes up some principles of sustainable travel but only in a piecemeal way and they lack a real vision for how London needs to be getting around in 2040.

These policies do include strong Healthy Streets principles, and these are placed throughout the plan in a cross-cutting way, though there are some gaps, and even these plans will only be achievable if the Mayor can reduce the overall amount of traffic in London.

The final plan therefore needs to include a target to reduce traffic overall, not just targets for a shift in mode share. In doing so, the Mayor also needs to go further than the unambitious London-wide traffic reduction target in his draft Transport Strategy. These would only reduce total anticipated levels of traffic by 10-15 per cent by 2041.⁵¹

I cannot see anything in this plan that aims to reduce road space for motor traffic as part of development – a prerequisite, also enabled by reducing traffic, for creating space for walking, cycling and Healthy Streets. In particular the parking policies in this draft Plan are not acceptable. They permit excessive residential parking in outer boroughs without the evidence to demonstrate need. This could seriously undermine the Mayor's goals.

T1 STRATEGIC APPROACH TO TRANSPORT

Assembly Members have asked the Mayor consistently for a clear traffic reduction target, in terms of overall volume, to be set.

In July 2016, Caroline Russell AM wrote to the Mayor with a list of transport experts who



could help advise him on effective ways to reduce traffic in London.⁵² The Mayor wrote back saying: "I look forward to working with you to reduce traffic across London." In Towards a new London Plan I asked for this commitment to be reflected in the London Plan.

It is therefore good to see at least some effort made in this direction in the draft policies, although they stop short of the clear targets for reductions in traffic volumes that we asked for.

Policy T1 sets a mode share target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041. However, these are not broken down by borough, and are not set higher in the centre of the city where they should be much more ambitious – see also my comments on policy SD4 and the Central Activities Zone.

The mode share targets also don't seem to cover any trips that are not for personal travel, and no targets are set separately for travel for other purposes. The scope of the target should be made clearer and/or separate targets set for different journey purposes.

Proposed amendment to T1 (with suitable supporting text and targets needed)

A Development Plans and development proposals should support:

- the delivery of the Mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041
- 2) the proposed transport schemes set out

in Table 10.1

 the achievement of the traffic volume reduction targets for each borough given in table [x], and the overall target for the Central Activities Zone (CAZ) for all developments within the CAZ.

T2 HEALTHY STREETS

I am very happy to see the draft Plan embrace the Healthy Streets approach and that these principles are included in so many places within the policies.

The way Healthy Streets is handled does seem like a real improvement over A City for All Londoners, which appeared to water down the principles for non-central areas.⁵³ In contrast, all the principles in the new draft London Plan seem to apply everywhere across London, which is very welcome.

However, for absolute consistency, there are a number of policies where these principles should also be mentioned:

- SD1 Opportunity Areas
- D7 Public realm
- D10 Safety, security and resilience to emergency

T3 TRANSPORT CAPACITY, CONNECTIVITY AND SAFEGUARDING

This policy includes the Mayor's indicative list of transport schemes in table 10.1.

It appears that all the new schemes added here, compared with the current London Plan, are for new public transport infrastructure or schemes to support walking and cycling, which is good. However, redundant and dangerous schemes to increase road capacity have not been removed from previous plans and should not be in this draft, including:

- Silvertown Tunnel (listed under Bus Network)
- Gallions Reach and/or Belvedere road crossings

In addition, many expert bodies agree that the main way the Mayor can directly affect traffic levels, and make space for streets to be opened up for healthy travel, is with a smart, fair, time-, distance- and pollution-dependent system of road pricing.⁵⁴

In this policy, the timescale for the implementation of new advanced road pricing schemes is very vague – currently 2022-2041. This needs to be brought forward such that the timescale effectively commits the Mayor to making plans for this in his current term of office. He cannot, as his predecessor did, leave it up to the next Mayor to shoulder the entire political burden of planning and implementing this important innovation.

Finally, the table gives the cost of new roadpricing schemes as med/high. This does not make sense as any effective scheme at reducing traffic would raise significant surplus revenue over time.

T6 CAR PARKING

Policy T6 B states "car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking ('car-lite')." But this is undermined by high residential parking standards for many areas with high PTALs. For example inner London PTAL 3 has a



provision of 0.25 spaces per unit – this is not needed. Camden has borough-wide car-free policies for new developments and many areas at PTAL 3 where the ATOS data combined shows no parking is needed. ⁵⁵

Camden has also seen a 31 per cent reduction in trips by car since introducing car-free and car-capping policies – this is higher than the London average of 27 per cent over the same period.

The provision is also inconsistently applied in the table – inner London PTAL 4 is designated car-free but outer London PTAL 4 is given 0.5 spaces per unit.

There is also a discrepancy of 0.5 spaces per unit between provision of parking in areas of PTAL 4, depending on whether it is deemed inner or outer London. This is irrational: simply being in a borough defined as 'outer London' isn't a reason to override a good PTAL rating and provide extra parking.

Similarly, the category Outer London Opportunity Areas allows 0.5 spaces per unit but there's no transport reason why either of these factors should mean parking is needed.

In places of poor public transport accessibility, where PTAL measures 0-1, up to 1.5 spaces per unit is granted. However, somewhere with such low accessibility should arguably not have any housing built at all. Certainly, any large development should be required to improve the PTAL to at least 3 and add services to improve ATOS rating before residents move in, instead of allowing a large amount of new parking.

Because of the increased ability of larger developments to provide for improving accessibility, no parking should apply in any large development, and revised (lower) limits

Failings of the PTAL methodology

The methodology that calculates PTALs dates back to 1992, and Transport for London itself admits that it takes no account of: ⁵⁶

- The speed or utility of accessible service
- Crowding, including the ability to board services
- Ease of interchange (including, for example, the availability of services from a rail or tube station that is a short bus ride away)

The method also has arbitrary cut-offs in terms of distance from public transport stations and stops, beyond which no provision is assumed. For buses, this cut-off is 640 metres, and for rail, underground and light rail services, anything beyond a distance of 960 metres is ignored. In reality, people in London are prepared to walk small additional distances to reach good tube, train and bus services.

In contrast, ATOS (Access to Opportunities and Services) assessments do take account of what is at the end of journeys, take account of good walking and cycling provision and provide for a better assessment of whether measures to provide more local services or improvements to public transport might be needed in an area.

Towards a new London Plan

should only apply to small developments of less than 25 units.

These smaller developments should also be asked to pay a large premium via S106 towards improving transport and access to local services in the area for each parking space they do ask for, as an incentive to go below the limits.



T8 AVIATION

This policy supports airport expansion across the South East, saying:

Policy T8 A

The Mayor supports the case for additional aviation capacity in the South East of England providing it would meet London's passenger and freight needs, recognising that this is crucial to London's continuing prosperity and to maintaining its international competitiveness and worldcity status.

This is not true in economic terms as many flights currently taken do not help our local economy, and there could be spare capacity created for international business travel through simple demand management measures targeted at frequent leisure flyers.⁵⁷

Any airport expansion is impossible to approve if the UK is to meet its international commitments to reduce greenhouse gases and its legal obligations to reduce air pollution to safe limits in as short a time as possible.

Even within London, policy T8 D only addresses the expansion of Heathrow Airport and thus appears to endorse expansion of Gatwick Stanstead and other smaller airports, such as London City Airport and Northolt.

There is no point in this policy asking proposals for new airport capacity to "demonstrate that there is an overriding public interest or no suitable alternative solution with fewer environmental impacts," as this could never be achieved. Expansion of any airport within London's transport catchment area would not only affect climate emissions and noise, but also impact on our transport network and increase air pollution from these sources too.



A The Mayor supports the case for opposes any additional aviation capacity in the South East of England. providing it would meet London's passenger and freight needs, recognising that this is crucial to London's continuing prosperity and to maintaining its international competitiveness and world-city status.

B The Mayor supports the role of London's airports in enhancing London's spatial growth, particularly within Opportunity Areas well connected to the airports by public transport and which can accommodate significant numbers of new homes and jobs.

C B The environmental impacts of aviation must be fully acknowledged and the aviation industry should fully meet its external and environmental costs particularly in respect of noise, air quality and climate change and this means no expansion of capacity is possible without significant harm; any airport expansion scheme must be appropriately assessed and if required demonstrate that there is an overriding public interest or no suitable alternative solution with fewer environmental impacts.

D The Mayor will oppose the expansion of Heathrow Airport unless it can be shown that no additional noise or air quality harm would result, and that the benefits of future regulatory and technology improvements would be fairly shared with affected communities.

E All airport expansion proposals should demonstrate how public transport and other surface access networks would accommodate resulting increases in demand alongside forecast background growth; this should include credible plans



by the airport for funding and delivery of the required infrastructure.

F Proposals that would lead to changes in airport operations or air traffic movements must take full account of their environmental impacts and the views of affected communities. Any changes to London's airspace must treat London's major airports equitably when airspace is allocated.

G Better use should be made of existing airport capacity, underpinned by upgraded passenger and freight facilities and improved surface access links, in particular rail.

H Airport operators should work closely with airlines, Transport for London and other transport providers and stakeholders to ensure straightforward, seamless and integrated connectivity and to improve facilities and inclusive access. They should also increase the proportion of journeys passengers and staff make by sustainable means such as rail, bus and cycling, and minimise the environmental impacts of airport servicing and onward freight transport.

I Development of general and business aviation activity should generally be supported providing this would not lead to additional environmental harm, or impact on scheduled flight operations. Any significant shift in the mix of operations using an airport – for example introduction of scheduled flights at airports not generally offering such flights – should normally be refused.

J-C New heliports should be refused, other than for emergency services, and steps should be taken to reduce helicopters overflying London.



WHAT DO YOU THINK?

I would like to hear more from Londoners about the London Plan and how you think housing, design, the economy, culture, transport, and social and green infrastructure should be planned.

Please get in touch with me if you have any comments or suggestions.

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This report sets out my views as an individual Assembly Member and not the agreed view of the entire Assembly.

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⁸ The RAC Foundation's major 'On the Move' report in 2012 looked at likely influencing factors on changes in car use and increases in rail patronage from the 1990s and concluded that spatial planning policies, encouraging the reuse of brownfield sites and the application of the sequential test, had been successful.

http://www.racfoundation.org/research/mobility/on-the-move-main-research-page

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¹² Assembly backs my motion for truly public spaces. Sian Berry AM, Sep 2017 http://www.sianberry.london/news/your-london/2017_09_07_assembly-motion-public-spaces/ ¹³ Camden Planning Guidance review information <u>https://camden.gov.uk/ccm/content/environment/planning-</u> and-built-environment/two/planning-policy/supplementary-planning-documents/camden-planning-guidance.en ¹⁴ Boris's pledge for drinking fountains in parks runs dry. Evening Standard, 28 Sep 2009 https://www.standard.co.uk/news/boris-s-pledge-for-drinking-fountains-in-parks-runs-dry-6732044.html ¹⁵ Khan plans network of water fountains, Guardian, 4 Dec 2017 https://www.theguardian.com/environment/2017/dec/04/sadig-khan-plans-network-of-london-waterfountains-to-reduce-plastic-waste ¹⁶ Music Venues Rescue Plan 2015 https://www.london.gov.uk/sites/default/files/londons_grassroots music venues - rescue plan october 2015.pdf Updated 2017 https://www.london.gov.uk/sites/default/files/rescue plan for londons grassroots music venues progress update - jan 2017.pdf ¹⁷ Mayor welcomes Darren Johnson AM's call to protect the capital's live music venues. London Green Party, Oct 2014 https://london.greenparty.org.uk/news/2014/10/28/mayor-welcomes-darren-johnson-am%E2%80%99scall-to-protect-the-capital%E2%80%99s-live-music-venues/ ¹⁸ Time to act on traffic noise marring London's parks. CPRE, Sep 2015 https://www.cpre.org.uk/mediacentre/latest-news-releases/item/4102-time-to-act-on-traffic-noise-marring-london-s-parks ¹⁹ Table 1 from 2017 London Strategic Housing Market Assessment. ²⁰ Public Transport Accessibility Levels methodology paper, Transport for London, 2010 https://data.london.gov.uk/dataset/public-transport-accessibility-levels ²¹ Oral evidence from boroughs. Item 5, Housing Committee, London Assembly 23 Jan 2018 https://www.london.gov.uk/moderngov/ieListDocuments.aspx?Cld=302&Mld=6213&Ver=4 ²² New council homes for London. MQ 2017/3000 http://questions.london.gov.uk/QuestionSearch/searchclient/questions/question 294715 ²³ Consultation response expected to be posted at http://www.londontenants.org. From analysis here: http://www.londontenants.org/publications/reports/10%20years%20-%20housing%20targets%20(FF).pdf ²⁴ Oral evidence from GLA officers. Item 5, Housing Committee, London Assembly 23 Jan 2018 https://www.london.gov.uk/moderngov/ieListDocuments.aspx?CId=302&MId=6213&Ver=4 ²⁵ Response to the Mayor's draft Housing Strategy. Sian Berry AM, December 2017 http://www.sianberry.london/wpcontent/uploads/2018/01/2017_12_Sian_Berry_Response_to_draft_housing_strategy.pdf ²⁶ Transcript of Housing Committee meeting, item 5. London Assembly, 23 Jan 2018 https://www.london.gov.uk/moderngov/ieListDocuments.aspx?CId=302&MId=6213&Ver=4 ²⁷ Housing in London 2017. GLA, Feb 2017 <u>https://data.london.gov.uk/dataset/housing-london</u> ²⁸ Response to the Mayor's draft Housing Strategy. Sian Berry AM, December 2017 http://www.sianberry.london/wpcontent/uploads/2018/01/2017_12_Sian_Berry_Response_to_draft_housing_strategy.pdf ²⁹ Use of the term 'Living Rent'. MQ 2018/0125, Sian Berry AM http://questions.london.gov.uk/QuestionSearch/searchclient/questions/question 297539 ³⁰ Mayor's Good Practice Guide to Estate Regneration. Feb 2018 <u>https://www.london.gov.uk/what-we-</u> do/housing-and-land/improving-quality/good-practice-guide-estate-regeneration ³¹ Section 4.8.4.1, Economic Evidence Base for London 2016. GLA Economics, Nov 2016 https://www.london.gov.uk/what-we-do/research-and-analysis/economy-and-employment/economicevidence-base-london-2016 ³² Section 6.4. of the SHMA says: "Like the 2013 report, this SHMA uses three years of data from the government's English Housing Survey (EHS) as its main source of data on household characteristics, incomes

City Hall Green Sian Berry AM and housing costs in London. The EHS is a national survey, interviewing a sample of around 13,000 households a year and weighting the results to be representative at the national level. The EHS covers a wide range of housing-related topics in detail, making it a key source of information on topics such as tenure, overcrowding and housing affordability, at national and regional levels. However, a single year of EHS data contains less than two thousand cases from London, not enough to give reasonably precise estimates when disaggregated by tenure and household type. The SHMA model therefore uses averages calculated from the three years 2012/13 to 2014/15, as data from 2015/16 was not yet available when the analysis was being carried out." ³³ See page 24. Convergence Annual Report 2015-16. Growth Boroughs Partnership

(http://www.growthboroughs.com/convergence/) Direct document link:

https://static1.squarespace.com/static/50b4ab77e4b0214dc1f631e9/t/58977d7b29687ff9f4cbd575/148632307

7253/Convergence+Annual+Report+15-16+fin.pdf

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Affordable student rent (2). MQ 2017/5000, Sian Berry AM

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³⁶ Sport England, Assessing Needs and Opportunities for sporting provision

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https://www.london.gov.uk/sites/default/files/helping_smes_to_thrivefinal.pdf

³⁸ The end of industry in London? Jenny Jones AM, February 2015

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³⁹ Read more about the Camley Street Sustainability Zone proposals here: <u>http://cssz.london/uncategorized/a-</u>proposed-redevelopment-project-on-the-camley-streetcedar-way-industrial-estate-the-story-so-far/

⁴⁰ Exhibition space in London, Mayor's Question, July 2017

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⁴¹ Data supplied by Association of Event Organisers

⁴² The Circular Economy. London Assembly Environment Committee, Sep 2017

https://www.london.gov.uk/about-us/london-assembly/london-assembly-publications/waste-circular-economy ⁴³ Concentration of fast food outlets near schools. Sustain, the alliance for better food and farming. 29 Jan 2018 https://www.sustainweb.org/news/jan18_fast_food_outlets/

⁴⁴ <u>https://savehackneywick.org/downloads/SaveHackneyWick-NineFalseStatements-20180111.pdf</u>

⁴⁵ Creative tensions. London Assembly Regeneration Committee, Mar 2017

https://www.london.gov.uk/sites/default/files/london_assembly_regeneration_committee_creative_tensions.pdf

⁴⁶ Rewrite the night: the future of London's night-time economy. Assembly Economy Committee report, Feb 2018 https://www.london.gov.uk/sites/default/files/rewrite_the_night_final.pdf

⁴⁷ London Assembly's Environment Committee letter to Mayor on London's biodiversity, Mar 2015 <u>https://www.london.gov.uk/about-us/about-us/london-assembly/london-assembly-publications/environment-committees-letter-mayor-londons</u>

⁴⁸ Cultivating the Capital. London Assembly Planning and Housing Committee, Jan 2010 https://www.london.gov.uk/sites/default/files/gla_migrate_files_destination/archives/archive-assemblyreports-plansd-growing-food.pdf

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<u>https://www.london.gov.uk/about-us/london-assembly/london-assembly-publications/waste-circular-economy</u>
⁵¹ Updated draft Mayor's Transport Strategy. Mayor of London, Mar 2018

https://www.london.gov.uk/moderngov/documents/b16916/Draft%20Transport%20Strategy%20Thursday%200 8-Mar-2018%2010.00%20London%20Assembly%20Plenary.pdf?T=9

⁵² Mayor urged to apply Olympic lessons to traffic reduction, Caroline Russell AM, July 2016
<u>https://www.london.gov.uk/press-releases/assembly/caroline-russell/olympic-lessons-to-traffic-reduction</u>
⁵³ For example see figure 3 on page 27 of 'A City for All Londoners':

https://www.london.gov.uk/sites/default/files/city_for_all_londoners_nov_2016.pdf

⁵⁴ For example, the Federation of Small Businesses in its 2016 manifesto asked the next Mayor to introduce "A fully demand-managed transport system" and "A dynamic demand-based charging system." London First in its 2014 report Jams today, jams tomorrow, aimed at the next Mayor, said: "We need a far cleverer congestion charging regime where costs vary more based on those roads and times of day where congestion is worst. The sooner Londoners and London government come to terms with this reality and we start working up a solution the better." (http://londonfirst.co.uk/london-congestion-charge-needs-radical-overhaul-to-keep-city-moving/) The Royal Town Planning Institute's report, Planning priorities for the next Mayor, in February 2016, said: "Intelligent road user pricing is needed to reduce peak motor traffic demand, internalise the costs of road transport, and incentivise low and zero carbon vehicles." The Institute of Civil Engineering, in its Infrastructure for London manifesto 2016, asked for: "A complete review of road user charges is required in London," and said: "With new road user charges London would experience improvements in air quality, reductions in emissions of carbon dioxide, nitrogen oxides and particulate matter into the air." The Royal Academy of Engineering report The Transport Congestion Challenge, from December 2015, also concluded that "efficient road pricing offers the single best way to tackle road congestion." (http://www.raeng.org.uk/news/news-

releases/2015/december/academy-transport-experts-consider-ways-to-reduce)

⁵⁵ Camden Local Plan Evidence Report. Car free development. London Borough of Camden, February 2016 https://camden.gov.uk/ccm/cms-service/stream/asset/?asset_id=3414522

⁵⁶ Public Transport Accessibility Levels methodology paper, Transport for London, 2010 <u>https://data.london.gov.uk/dataset/public-transport-accessibility-levels</u>

⁵⁷ See for example the proposals put forward by A Free Ride, a group of fairness, transport and environmental organisations: <u>http://afreeride.org/an-open-letter-alternatives-to-runways/</u>

