

Miss Olga Astaniotis comments

Page: [Introducing the Plan](#)

Section: [N/A](#)

Reference the following bullets:

- Sustainability Appraisal
- Equalities Impact Assessment
- Health Impact Assessment
- Community Safety Impact Assessment

What is meant by sustainability? is this environmental, financial and social sustainability combined or just environmental? I think it needs to be clear which definition of sustainability is being used in this context

What is meant by "community"? is this individuals, groups of individuals? Does it include businesses as a community. Again, definition required.

Page: [Chapter 1 Planning London's Future \(Good Growth Policies\)](#)

Section: [1.0.6](#)

Housing shortage is not just a function of population growth, but more a function of the commoditisation of housing; a function of the fact that we have allowed the free market, since right-to-buy, to drive house price inflation and to create a culture of home ownership as an asset/investment, instead of as a utility necessary for a decent, good life.

Lack of state-provision in the housing sector is a major issue which this paragraph (which sets context) fails to acknowledge. Building more houses is insufficient if they are built on the basis of a free-market model

Page: [Chapter 1 Planning London's Future \(Good Growth Policies\)](#)

Section: [1.0.7](#)

In seeking to reduce inequality, social housing must be considered in the same way we consider education and NHS; in other words we are all entitled to be housed and, where necessary, the State must intervene to drive that equality regardless of income, or ability to build a 25% deposit. A different model is required

Page: [Policy GG1 Building strong and inclusive communities](#)

Section: [1.1.5](#)

Businesses are part of the communities that are referenced, but because Local Authorities do not receive the rates paid by businesses and because businesses do not vote the business voice is too often neglected. The rates system is prohibitive to good economic growth in all sorts of ways and London, as the largest economy in the country, should be lobbying to get this changed. But given that it will not change any time soon, we must ensure that adequate weight is given to all community voices, including businesses. How will planners be encouraged to do so?

Page: [Policy GG1 Building strong and inclusive communities](#)

Section: [GG1](#)

How does the plan intend to define terms such as "quality", "affordable". What defines quality opportunities, quality developments etc? What is the measure of affordability? Does this plan give guidance? If not, then each authority will have their own definition and these measures will not be met in a way that achieves the aims of equality, affordability, quality, sustainability

Page: [Policy GG2 Making the best use of land](#)

Section: [N/A](#)

How has it been calculated that 80% of people will eventually be able to get to their place of work without the use of a car? Where is the evidence base and what is the starting point today?

As casual, freelance and zero-hours contracts become more prevalent, with job security diminishing, it is more likely that employees will need to travel to various places of work to earn a living. This will make it harder for Londoners to use a single mode of transport to get to their multiple places of work

Page: [Policy GG2 Making the best use of land](#)

Section: [GG2](#)

How will employment land be protected? This has not been addressed. GLA has already released too much of its employment/industrial land by its own admission.

London needs suitable employment premises not just for new, clean, office based jobs, but for all types of workplaces that are likely to provide the depth and breadth of employment that ALL Londoners need, not just those with higher qualifications. Therefore, the more traditional industries must also have somewhere to go, especially as they are being pushed out of central boroughs. If left to the Councils to decide, they will choose what is best only for their immediate priorities and not what is best for London as a whole, so how does this plan look at industrial and employment land as a single asset base for London, rather than as the responsibility of each individual Local Authority?

The theory of mixed-use development does not always work in practice. What examples of good practice and success underpin this vision for mixed-use development and what measures have been taken to map and understand demand and practicalities. There are tensions, e.g., a 24-hour smart city needs deliveries and cleaners and waste disposal; noisy activities which wake up and annoy residents. How does this collocation of business and residential actually work in practice?

Page: [Policy GG4 Delivering the homes Londoners need](#)

Section: N/A

Housing shortage is not just a function of population growth, but also a function of the commoditisation of housing; of the fact that we have allowed the free market, since right-to-buy, to drive house price inflation and to create a culture of home ownership as an asset/investment, instead of as a utility necessary for a decent, good life. Lack of state-provision in the housing sector is a major issue which is not addressed here. Building more houses is insufficient if they are built on the basis of a free-market model, whether they are affordable or not. All that happens is that today's affordable homes become unaffordable to the next generation of home owners. This Plan fails to look at publicly-owned housing, distributed on the basis of need, and without the artificial boundaries of local authorities getting in the way.

Page: [Policy GG6 Increasing efficiency and resilience](#)

Section: N/A

Developing efficient, sustainable projects that mitigate the effects of pollution and climate change is a relatively new discipline. In suggesting that private, public and third sector organisations work together, there is an assumption that officers and decision makers within these organisations actually know what to do and how to do it to affect the ambitions of this Policy.

Sadly, this is not the case, the people who are making decisions and planning developmentd are not always in possession of facts and knowledege and experience, especially in the third sector and where this relatively new subject and discipline is concerned. What is needed is a comprehensive and accessible resource library of examples, suppliers, good practice, points of contact, training, workshops and peer-to-peer learning and cost-benefit models, so that those who are responsible for planning and implementation can start from a position of knowledege and can take in to account good practice across the globe

Page: [Policy SD1 Opportunity Areas](#)

Section: [N/A](#)

Increasingly travel-to-work by foot, by cycling and public transport requires not only a transport infrastructure, but policies that safeguard employment and industrial zones so that those who live in the new housing developments also have jobs nearby that they can easily and safely travel to by these non-car modes. We are over-reliant on jobs in the centre, hence rush-hour overcrowing; and over-reliant on the car in the outer boroughs where transport linsk to indsutrial and employment zones does not work, e.g., in the London Riverside Opportunity Area. I don't see this issues addressed strongly enough in this plan or in Local Authirity plans

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Page: [Crossrail 2](#)

Section: [N/A](#)

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

Page: [Policy D1 London's form and characteristics](#)

Section: [N/A](#)

In order for the principles of the circular economy (or any progressive sustainable construction models) to apply, there has to be an explicit commitment from individual Authorities and knowledge amongst the planners who run our planning system, implement the guidelines and laws and liaise with developers on a daily basis. We are already behind on much simpler issues such as superfast connectivity, so it seems that a mere statement of intent in this plan will be insufficient to actually instill circular economy principles within the lifetime of this Mayoral term and this plan.

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Page: [Policy S3 Education and childcare facilities](#)

Section: [N/A](#)

Women still bear the brunt of childcare, putting their careers on hold or not realising their entrepreneurial dreams because of their responsibilities.

A radical and inventive approach should be considered that also takes in to account the changing nature of jobs and employment. Self-employment or starting a business is an increasingly necessary and preferred option for women, whose entrepreneurial talents are not being realised. Workspace hubs should be an integral part of high streets and industrial areas, with good transport links and facilities, and crucially, with flexible creches and childcare facilities on-site.

These facilities should be positively encouraged and even subsidised so that we can reap the full economic benefit of women starting strong and successful businesses.

Page: [Policy E4 Land for industry, logistics and services to support London's economic function](#)

Section: [N/A](#)

There seems to be limited information on future demand and how this demand will be monitored, unlike with housing demand which seems precise and well-researched. It's therefore worrying to see a vaguer vision of retaining rather than growing, when we know that there has been a significant loss of industrial land over the last 10 years.

Mixed use developments will work with the service industry and office based business, but not with heavy and industrial business, so it is important that Local Authorities are, collectively, safeguarding Strategic Industrial Land and non-designated sites.

Application of the policy at a London-wide level, when the designations and planning decisions are in the hands of individual authorities does not make sense. This needs firmer management and oversight. Borough A releasing land on the basis that Borough B is loosely expected to retain or add to supply, does not seem workable.

Page: [Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function](#)

Section: [N/A](#)

The continued need for yard space should not be dismissed entirely. The businesses that need to service London's growing and changing character (24-hour economy, intensified housing and office-based businesses, growing tourism, reduced vehicle usage), will necessarily have to reside in the outer boroughs. They will not be able to function properly if we do not maintain the right mix of industrial premises. This plan makes no allowance for that and also seems to neglect the reality that some activities and jobs will continue to be "dirty", "noisy", "unappealing" for residents to have on their doorstep.

Page: [Policy E5 Strategic Industrial Locations \(SIL\)](#)

Section: [N/A](#)

Intensification and co-location are unproven models on a wide scale, and so are insufficient methods by which to retain industrial land capacity. The “let’s build up” approach is incompatible with certain usage types and may also be financially prohibitive for developers. New sites also need to be identified and developed in line with knowledge of future demand, future growth industries and jobs, and future technological and logistical imperatives.

Where is the underpinning research that demonstrates a) if intensification and co-location is viable b) in what form is it viable and what are the timescales for London to achieve this new model and c) for which industries and types of business does it work best/not work at all?

This policy does not make sufficiently strong reference to the need for continued investment in strategic infrastructures, including digital connectivity, utilities and transport to support the continued success and growth of SILs.

Page: [Policy E8 Sector growth opportunities and clusters](#)

Section: [N/A](#)

London has consistently failed to spread the economic and wealth impact and benefit to those groups that are described as disadvantaged, e.g., BME, disabled, women, those with lower qualifications. This is evident from the fact that, in the last 20 years, the pockets of disadvantage have barely shifted.

A radical and bold approach is required to ensure that, in choosing winners, we not only multiply the economic impact for London, which inevitably is distributed to the wealthiest few, but that:

a) the economic and wealth benefit permeates all levels of society, not just adds to London's GDP

b) the most successful business' are given the incentive, opportunity and means by which to engage with and include those that traditionally do not reap the benefits

GDP as a measure of growth is part of the problem. We should be incentivising sectors that genuinely operate along the principles of the 3 pillars of sustainability: social, environmental, economic; and the circular economy principles. Merely measuring GDP will not change the dynamics of poverty and exclusion.

The principles of good growth and good jobs, which are visible elsewhere in the Mayor's rhetoric and projects, seem to be missing from this section, where they are most important.

If the aim of supporting SOLDC's is genuine then another important factor must be considered. When designing funding streams, such as Greener Cities Funding, Air Quality Funding, the outer industrial/strategic centres cannot compete with the central London boroughs on impact measures which are already skewed to favour central London, e.g., where the volumes of people and concentrations of businesses will always be higher and so bang for buck will always be more significant.

In implementing this plan, measures of success must be relevant and relative to the area which is being targeted. One size rarely fits all.

With food markets in particular, traders need the appropriate premises from which to prepare their food. London's stock of industrial food standard premises is not only insufficient, but expensive. This is where local authorities could get creative, with intensified and colocation micro-business units that can provide the infrastructure and environment necessary for traders to not only operate from, but from which to grow a business, including:

- small, flexible, mixed-use workspaces
- part-time/meanwhile use production kitchens
- locations close to the market
- adequate parking and access
- closeness to facilities such as shops, cafes and creches
- a support network and offer so that business failure rates are reduced and local people are encouraged to become traders

Crucially, for authorities to ensure that local people benefit and that economic success is shared amongst all sections of society, there has to be intervention. A free market model alone will not achieve this.