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Sadiq Khan (Mayor of London)
New London Plan
GLA City Hall
London Plan Team
Post Point 18
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London, SE1 2AA

BY EMAIL londonplan@london.gov.uk

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Your ref:

Dear Mayor Khan

Draft London Plan

We are writing on behalf of our client, Coin Street Community Builders (CSCB).

CSCB is a company limited by guarantee established by local residents in 1984 following a campaign against large scale office proposals. The company is controlled by a Board, elected by CSCB members. Only people living locally can become CSCB members.

CSCB is a social enterprise and its aim is to make its neighbourhood a great place to live, work in, and visit. Over the last 34 years, it has transformed a largely derelict 13 acre site into a thriving mixed use neighbourhood by creating new co-operative homes; shops, galleries, restaurants, cafes and bars; a park and riverside walkway; sports facilities; by organising festivals and events; and by providing childcare, family support, training and employment opportunities. Income is generated from a variety of sources including the hire of retail and catering spaces, exhibition, event and conference spaces, including from meanwhile uses.

CSCB welcomes the publication of the draft replacement London Plan. It supports the concept of "Good Growth". However CSCB has some concerns about two of the housing policies in the plan, based on their lack of clarity or the potential for unintended consequences.

Policy H1

Policy H1 promotes an increase in housing supply, which is welcomed. However, B2) of the policy states that:

"...boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions, especially the following sources of capacity..."

CSCB considers that care is required in London's Central Activities Zone to ensure that land suitable for CAZ strategic functions is protected from an over-emphasis on one land use. While CSCB was founded at a time when there were threats to continued living in central London, through the dominance of commercial development, the growth in demand for housing means that protection of existing (and the potential for proposed) employment, visitor economy and social infrastructure uses is important. Policy H1 should therefore be modified to include additional text: "Subject to other land use priorities including strategic functions in the CAZ..." at the beginning of H1 B2).

Policy H15

This policy provides a welcome new strategic focus on the delivery of housing for older people, including affordable homes in this sector. CSCB is committed to building a community which is supportive of all generations and is actively exploring the potential to provide older people's housing in Waterloo.

As drafted, Policy H15 draws a distinction between sheltered housing including extra care (defined in the Plan as Use Class C3) and nursing homes and hospices (Use Class C2). CSCB considers that care is required in drawing a sharp use class distinction, and hence approach to, affordable housing, within in this sector. In reality many facilities will blur the distinction between dwellings for older people in generally good health and facilities where an element of nursing care is required. The policy will need to be applied carefully on a case by case basis with a proportionate approach to the delivery of affordable homes. In order to achieve this we suggest that the wording of the policy is supplemented by the following additional paragraph added as "D":

"Where a proposed development provides a range of accommodation, including sheltered housing and facilities providing a greater delivery of nursing care, a proportionate approach should be taken to the calculation of affordable housing delivery."

We hope these comments are helpful to the Mayor in bringing forward the new London Plan. If you have any questions, please contact me. We would also now be grateful if we could be kept updated as the draft London Plan progresses.

Yours sincerely

Iain Rhind
Senior Director

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Iain Tuckett, Coin Street Community Builders