

# Mr Peter Eversden MBE comments

Page: [Foreword](#)

Section: [N/A](#)

The Mayor's objective is supported that he will "plan for accommodating growth in a way which is environmentally, economically and socially sustainable." Also for 'Good Growth', avoidance of Londoners feeling excluded, community cohesion and social integration, high quality open spaces, parks and commons and the building of thousands of genuinely affordable homes, half of which are to be genuinely affordable. However, see comment on paragraph 1.4.3 which seems to require 65% affordable homes.

It is important that the Mayor is supported in achievement of his targets and objectives by his requirement for the Government to grant more powers and investment to London.

Page: [Foreword](#)

Section: [N/A](#)

The Mayor's Foreword lacks the objectives he expressed in 'A City for All Londoners' that methods of transport will keep pace with the number of people needing to travel. Also the aim in that document for air quality to be back down to safe levels as soon as possible.

Page: [Introducing the Plan](#)

Section: [0.0.14](#)

Since the London Plan version in 2011 the delivery of homes each year has not achieved the targets. The housing delivery since 2015 and the rate of delivery under this Replacement London Plan through to 2022 will be essential information for ensuring that its policies are effective for the supply of homes.

Therefore this paragraph should set a date of 2022 for a review of the housing targets, not the more extended "before 2029".

Page: [Introducing the Plan](#)

Section: [0.0.20](#)

The statement is welcomed that "On some occasions, the Plan deviates from existing national policy and guidance; this is mainly where the Plan is delivering on a specific Mayoral commitment and reflects the particular circumstances of London."

The Examination of this Replacement London Plan should support that approach where it can be demonstrated that Government policies are wrong for London. Examples have been the imposed parking standards, housing standards and permitted development of offices which have been harmful.

Page: [Introducing the Plan](#)

Section: [0.0.22](#)

The production by boroughs of area and site specific allocations and plans is supported. It has proven in boroughs with that approach to be the most effective way of securing community commitment and support for development because they understand and have participated in policies and plans for what will be delivered and where. The use of Local Development Orders can speed planning decisions and complement the process of Permission in Principle.

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

Section: [1.0.1](#)

Car-free developments are supported as a policy but it means that the Government will have to withdraw its intervention on parking standards that adversely affected the content of the March 2015 version of the London Plan.

The parking standards in the New London Plan should be reduced due to the increase in public transport, new developments being near to good public transport, additional cycle superhighways and the phasing out of old diesel vehicles.

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

Section: [1.0.6](#)

The statement that "A focus on large multinational businesses in the centre of London has not been matched by economic development in other parts of the city." is not strictly correct.

The development of the Great West Corridor and the Chiswick Business Park in LB Hounslow has demonstrated how international organisations like GlaxoSmithKline, which has its headquarters there, Sky and others can be attracted. The background and success of that should be analysed for similar economic development to be achieved in other outer London locations and appropriate policies should be included in the Replacement London Plan in Chapters 2 and 6.

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

Section: [1.1.4](#)

Having "better public transport connectivity" as in paragraph 1.1.4 is not sufficient. There must be the right capacity on transport routes. The word 'better' is not definitive. The words should be changed to 'the required public transport accessibility, connectivity and capacity,'

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

Section: [GG1](#)

Policy GG1 B is inadequate in content to achieve what is described in paragraph 1.1.4. It must include the requirement for public transport of accessibility and capacity to meet existing and future needs. GG1 B should be modified to put the word 'easy' before the word 'access'. At the end of the section should be added 'The services and amenities must be sufficient for the needs of local people for various types of schools and other educational establishments, shopping facilities, healthcare, places for meeting and socialising and with close access to green and open spaces. They should be within walking and cycling distance of people's homes.' The latter would be consistent with the requirement expressed in paragraph 1.2.3.

It is not sufficient in Policy GG1 C that "streets and public spaces are planned for people to move around and spend time in comfort and safety, creating places where everyone is welcome." That section of the policy should have added the words 'The public realm should be maintained to a high standard, free of clutter and consistent across borough boundaries, particularly for conservation and historic areas. Good tree cover of suitable types is essential for shade and to combat air pollution.'

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

Section: [1.2.3](#)

The aims of this paragraph 1.2.3 are supported strongly, particularly in the provision of schools and other education establishments and employment schemes which develop the skills required for local economies and ensure high rates of employment.

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

Section: [1.2.7](#)

Paragraph 1.2.7 should be modified as follows to replace the word 'can' by 'should' or 'must'. "As new developments are designed, the special features that Londoners value about a place, such as cultural, historic or natural elements, should be used positively to guide and stimulate growth, and create distinctive, attractive and cherished places."

It is essential that development is context sensitive and acceptable to local people to secure their commitment to growth. Also that place making is a basis of decision making.

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

Section: [GG2](#)

Policy GG2 should not refer in its opening section to "high-density" but to 'optimum density' and the wording should be changed for the following reasons. The same applies to paragraph 1.2.3 and paragraph 2.6.2 in the section on Town Centres.

The policies in the Replacement London Plan seek to increase densities in any areas where there is sufficient amount of social infrastructure and public transport. Policy D2 section B for Determining the Capacity for Growth requires that "the most efficient use of land is made so that development on all sites is optimised." That is the only way to achieve Good Growth and successful communities. Policy D4 A states that "To optimise the development of housing on sites across London a range of housing typologies will need to be built." The housing density policy Policy D6 A 3) and paragraph 3.6.1 propose "optimum density" of housing. Policy D6 E requires that " . . . built form and massing measures should be considered in relation to the surrounding context to help inform the optimum density of a development." Paragraph 3.6.3 indicates to boroughs that "The surrounding infrastructure of all types is a key element in determining the optimum density of a site."

Similar words for optimisation appear in Policy H1 B 2) for increasing housing supply. The same is in Policy H12 and its paragraph 4.12.2 which refers to the optimum mix for a site.

Policy GG2 should not imply that in making the best use of land, new development will be of "high-density" when other policies make clear that housing density will depend upon local factors of social infrastructure, public transport, local context and character and "the health and wellbeing of communities." (Policy GG3 D).

In section E of GG2 the words 'and capacity' should be added after "public transport connections".

Overcrowding is a serious problem now on many public transport routes and economic growth, the satisfaction of employees and their employers and the general public travelling will be harmed unless those routes and new ones can accommodate the number of people using them.

The Mayor's Economic Development Strategy has indicated that good public transport and clean air are factors in the rating of cities by businesses as places for their location.

Page: [Policy GG3 Creating a healthy city](#)

Section: [1.3.3](#)

In paragraph 1.3.3 the words "active travel" is not a useful term. If it means 'other than by travelling in a car' it should state that.

Page: [Policy GG3 Creating a healthy city](#)

Section: [GG3](#)

Section B of GG3 should have added the words 'That must include the provision of subsidised sport and fitness centre facilities.'

It needs to be recognised that the privatisation of such facilities in boroughs has led to usage charges that are a serious deterrent for those on low to medium incomes. Places to exercise at low cost should be planned by boroughs and there must be London Plan policy to require them. Enabling people to be fit and healthy is essential.

Section E of GG3 should be modified to 'Plan for improved access to green spaces, the provision of new green infrastructure and the ongoing maintenance of parks and open spaces.'

Page: [Policy GG3 Creating a healthy city](#)

Section: [GG3](#)

The restriction of unhealthy food options in section G of GG3 are important but it is not clear how the Mayor will influence that by policy. There needs to be a cross-industry approach in the manufacture and preparation of food that reduces fat and sugar in the goods and meals available.

The Mayor should indicate in the Replacement London Plan how that aim will be approached, otherwise it will remain just an intention.



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

Section: [1.4.3](#)

Paragraph 1.4.3 does not make sense. It states that of 66,000 new homes each year 43,000 should be "genuinely affordable" and that seems reasonable due to the backlog of unmet need for such housing. So, 65% of new homes need to be affordable as in Table 4.3. However, the paragraph continues by stating that the Mayor's strategic target of 50% "genuinely affordable" homes supports the target. Clearly, it would not do so. This needs clarification, otherwise boroughs will not seek and negotiate the mix of housing types required.

There has to be indication of how the shortfall will be addressed and whether there is enough public sector land for housing development that can deliver well above 50% affordable housing.

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

Section: [1.4.4](#)

The statement in paragraph 1.4.4 that boroughs "are not required to take account of nationally-derived local-level need figures" is fully supported.

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

Section: [1.4.5](#)

The phrase "London must seek to deliver new homes through every available means." in paragraph 1.4.5 is unacceptable and should be removed. Developments of new homes must be approved only if each housing scheme conforms to the policies in the London Plan and in Local Plans. Other "means" could result in potential harm or unsatisfactory living conditions for occupants of new homes if the availability of social infrastructure, open space and public transport, acceptable housing standards and the risk of flooding are ignored.

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

Section: [1.4.6](#)

The word "are" should be replaced by "is".

It would be helpful if the words "all the tools at their disposal" were explained with some examples of what boroughs should do if permissions they have granted do not result in commencement of building within one year.

Section B of Policy GG4 should be modified for 65% of new homes to be affordable, to reflect paragraph 1.4.3 and the SHMA. The policy should have in it the words 'Almost half of the affordable homes must be low cost rent homes in order to meet the need identified in the London SHMA.' That is because three quarters of the backlog of housing need is for low cost rental homes, therefore that category should be given priority as the most urgent need.

The previous SHMA for the current London Plan aimed to meet the housing need backlog in 20 years, although Government guidance was to do so in five years. The latest SHMA has extended that by another five years to 25 years before the backlog will be met which means the housing crisis in London will continue for a longer period under the Replacement London Plan than was the intention of the current London Plan. That is unacceptable and means that more policy support and funding must be given for extra homes to rent at low prices.

After the word "needs," in Section C of Policy GG4 should be inserted the words 'with the required local mix of bedroom sizes and tenures.' Boroughs must be given the policy lead to resist developers trying to deliver only the type of housing that suits their profit motives.

Another section in GG4 should be included after C - 'Housing schemes that do not meet local housing need should be refused.'

There should be some explanation within this policy area covering bedroom size. The earlier SHMA required three and four bedroom homes to be approaching 50% of the total. That is understandable as the average number of children per family has risen in recent years, a fact for which this new Plan should include statistics. It is surprising that the new SHMA reduces that requirement to 29% of the total which would seem to fail to meet the needs of families in the capital. The latest SHMA requires over half of all new homes to be one bedroom types, whereas the current London Plan aims for one third to be of that size. This is a significant change and requires more explanation. It does not seem credible that 55% of all new dwellings should be for someone living on their own or in a partnership with no children.

Page: [Policy GG5 Growing a good economy](#)

Section: [N/A](#)

Policy GG5 lacks a section to reduce air pollution. It was identified by international surveys quoted in the Mayor's Economy Strategy that London was rated low by international businesses for its air pollution and lack of capacity on public transport. Unless those issues are expressly addressed in this and other policies, there will be an adverse effect on London's economy at a time there are concerns about the effect of Brexit on businesses and whether or not some companies may move from London into the EU.

Secondly, the content of paragraph 1.5.6 is relevant in considering London's economy. It states that the lack of affordable homes is hindering recruitment and retention of workers, particularly for "the operation of the emergency services, the health system and London's transport infrastructure." Lack of affordable homes would deter businesses from remaining in London or moving to it. That should be clarified and covered by Policy GG5 as a need by the words 'Achieve the right mix of types of new homes for each location'.

Policy GG5 fails to mention the approach taken in the current London Plan policies 2.6, 2.7 and 2.16 for growing the economy of outer London. There should be a cross reference in Policy GG5 to Policy E8 G for the development of Outer London Development Centres.

Page: [Policy GG5 Growing a good economy](#)

Section: [1.4.9](#)

The words 'good accessibility and capacity of public transport,' should be inserted after the word 'health'.

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

Section: [N/A](#)

Policy GG6 lacks a section for the retrofitting of existing housing and commercial buildings to achieve energy efficiency and resistance to extreme conditions. Boroughs should be helped by policy content on this within the policy.

Page: [Introduction to Chapter 2](#)

Section: [Figure 2.1](#)

The London Plan's Key Diagram in each Plan version has been difficult to read and hence to understand and use.

In addition to the full diagram, the Replacement London Plan should contain additional diagrams of each of the Key Diagram's four outer parts and of the central area, with overlaps, allowing larger text and, perhaps, indicating borough boundaries.

Page: [Introduction to Chapter 2](#)

Section: [2.0.7](#)

Paragraph 2.0.7 is supported strongly for its aim for regeneration and developing benefitting local communities.

It would be useful to add in that paragraph that communities should be fully engaged in development plans and their needs taken into account. There should be no displacement of key workers and those in other local employment.

Page: [Introduction to Chapter 2](#)

Section: [2.0.7](#)

The words "properly integrated" are too vague. There should be cross references to policies for context, character and consideration of historic environment and available services, such as PTAL (see Glossary), Policy D1 B 1), D2, D6, D7, D8, G6, HC1, HC2 and HC4.

Page: [Policy SD1 Opportunity Areas](#)

Section: [2.1.20](#)

Paragraph 2.1.20 is supported strongly for local authorities to identify the opportunities for development that Crossrail 2 will bring in Opportunity Area Planning Frameworks. The text should require Local Plans to be modified to have Area Action Plans or other Supplementary Planning Documents to define how those CR2 opportunities will be met. The Policy content for Crossrail 2 should cover that.

Page: [Policy SD1 Opportunity Areas](#)

Section: [Elizabeth Line East \(13\)](#)

Opportunities for stopping HS1 trains at Straford is not considered in this section of the Replacement London Plan. It would improve transport links and avoid HS2 passengers having to negotiate Euston and St Pancras stations to access HS1 when they could transfer at Old Oak to the Elizabeth Line.

It would also avoid overloading of those Central London stations and should be covered by relevant content in Policy for HS2.

Page: [Policy SD1 Opportunity Areas](#)

Section: [Heathrow/Elizabeth Line West \(14\)](#)

The opportunity for a rail link from the Great West Corridor at west Brentford in LB Hounslow to the Elizabeth Line at Southall should be investigated, costed and its timescale estimated. It should be covered in the policy proposals for the best exploitation of the Elizabeth Line.

Page: [Policy SD1 Opportunity Areas](#)

Section: [2.1.14 Bakerloo Line extension \(11\)](#)

The aims expressed in paragraph 2.1.14 are supported for the opportunity to consolidate industrial uses in the Old Kent Road and Park Royal OA that are displaced from other areas. The intensification of industrial land may not be sufficient, however, and there should be provision for increasing it where possible.

Close location of industrial uses and housing should be avoided if there would be conflict caused by industrial activities' noise, odours or considerable vehicle movements.

Page: [Policy SD1 Opportunity Areas](#)

Section: [Bakerloo Line extension \(11\)](#)

There seems to be significant dependence for development on the Bakerloo Line extension so the timescale of its delivery will be important for provision of the homes required and the attractiveness of the area through which it passes to businesses.

The examination of the Plan should consider if the Transport for London investment and delivery of the Bakerloo Line extension are suitable for achievement of the targets for homes and jobs.



Page: [Policy SD1 Opportunity Areas](#)

Section: [2.1.15 Bakerloo Line extension \(11\)](#)

The requirement is supported in paragraph 2.1.15 for "The need for the additional public open spaces the area will require as it evolves, and its broad location and scale, should be set out as part of the AAP."

That should apply to all Opportunity Areas and Local Plans should be modified to define how public open space will be achieved and existing space protected. That should be covered by content in Policy SD1, as proposed.

Page: [Policy SD1 Opportunity Areas](#)

Section: [Crossrail 2 \(9\)](#)

The Crossrail 2 policy should include the words 'Local Plans should be modified to have Area Action Plans or other Supplementary Planning Documents to define how CR2 opportunities will be met.'

Figures 2.5 and 2.6 indicate a route for Crossrail 2 which has varied from its original proposals. The proposed route should be discussed at the examination of the Replacement London Plan to consider if it provides the best transport congestion relief that it could and if its interchanges are the best for development.

The London Forum of Amenity and Civic Societies commented on the Crossrail 2 plans on behalf of communities and made the following points that should be taken into account:-

Submitted to Crossrail 2 - October 2015

Proposals - overall

1 Do you have any comments on the proposals for Crossrail 2 overall?

Overall comments:

The need for a north-east to south-west rail link to relieve congestion on existing tube lines and extend the network to more parts of London, has been understood for decades. Mrs. Thatcher was persuaded to safeguard a route for it.

The recent preference for a Regional rather than a Metro scheme flies in the face of the London Plan, whose first transport objective is to reduce the need to travel. The consultation on this point did not reach those affected, and was presented as an obscure debate between railway experts, unlike the current consultation which is genuinely reaching out to concerned parties.

A feature of the original scheme was the provision of interchange with all local lines crossed, so that the journeys of passengers could be shortened and the most congested lines relieved.

The construction of a new line inevitably involves disruption. We would expect removal of spoil by road to be minimised and confined to suitable main roads.

Wherever possible, water and rail should be used instead.

New Southgate

2 Do you have any comments about the proposals for a Crossrail 2 station at New Southgate?

Comments:

We certainly support an interchange with the Great Northern services, but if the only provision were to be at New Southgate, stations on the Hertford loop would be excluded as well as those south of Alexandra Palace.

Additional services at this station would support development in the area, but it is widely accepted that the greatest opportunity of growth lies further east. The route through Hackney Central should have greater priority.

3 Do you have any comments about the proposals for a Crossrail 2 depot and stabling facility north of New Southgate?

Comments:

not beyond the comments above

4 Do you have any comments about the proposals for a tunnel portal south of New Southgate?

Comments:

not beyond the comments above

Turnpike Lane / Alexandra Palace / Wood Green

5 Do you have any comments about the proposals for a Crossrail 2 station at Turnpike Lane?

Comments:

We welcome the provision of an interchange with the Piccadilly line. The main advantage of the proposed station at Turnpike Lane is that it is associated with a station at Alexandra Palace. If an alternative provision were made for interchange with the Hertford loop trains, by a station at Essex Road, Wood Green would have a stronger case.

6 Do you have any comments about the proposals for a Crossrail 2 station at Alexandra Palace?

Comments:

Under the current proposals Alexandra Palace represents the only opportunity for passengers from Hertford loop stations joining CrossRail2. It is therefore the best option currently on the table. If however a station were reinstated at Essex Road, the case for the alternative route via Wood Green would be much stronger.

7 Do you have any comments about the proposals for a Crossrail 2 station at Wood Green?

Comments:

Wood Green has a strong case taken in its own right; but the interchange for Hertford Loop passengers is paramount.

8 Do you have any comments about the proposals for a shaft at Downhills Recreation Ground, between Wood Green and Seven Sisters stations?

Comments:

no - this is a matter for local resolution,

Tottenham Hale

9 Do you have any comments about the proposals for a Crossrail 2 station at Tottenham Hale?

Comments:

If a route towards Stansted is to be developed a station at Tottenham Hale is a must.

10 Do you have any comments about the proposals for a tunnel portal south of Tottenham Hale?

Comments:

no - for local resolution

Seven Sisters

11 Do you have any comments about the proposals for a Crossrail 2 station at Seven Sisters?

Comments:

As previously indicated, we believe the New Southgate spur should be afforded a lower priority than the route through Hackney Central. However, if it were developed a station at Seven Sisters would be an essential component.

Dalston (inc. Shoreditch Park and Stamford Hill)

12 Do you have any comments about the proposals for a Crossrail 2 station at Dalston?

Comments:

The station is ideally sited, giving good interchange with both the North London and East London branches of the Overground.

There is some concern at the loss of an attractive terrace in Bradbury Street

13 Do you have any comments about the proposed options for a shaft in the Shoreditch Park area, between Angel and Dalston?

Comments:

This is a logical place for it; but a far better scheme would take the route to Essex Road as originally safeguarded, providing much needed relief to the GN Moorgate services.

14 Do you have any comments about the proposals for a shaft at Stamford Hill, between Dalston, Seven Sisters and Tottenham Hale?

Comments:

If the Hackney Central route were given priority over the New Southgate spur a smaller shafty could be constructed. However, we accept that there may be a case for passive provision for the New Southgate spur at a later date.

Angel

15 Do you have any comments about the proposals for a Crossrail 2 station at Angel?

Comments:

There is a strong case for greater capacity at the Angel. However, interchange is already provided with the Northern line at King's Cross or Euston.

Visitors to Upper Street already choose to travel to Highbury and walk down. A station at Essex Road, with an additional point of egress to the south of the current station, would better meet the need to improve links to this area and would provide the interchange that would decongest the GN line. Trains in the morning peak are so crowded it is difficult to board, yet at other times the line and the station are under-utilised.

Euston St. Pancras

16 Do you have any comments about the proposals for a Crossrail 2 station at Euston St. Pancras?

Comments:

The case for Crossrail2 was made thirty years ago - congestion relief was needed then, it is more desirable now. It does not need HS2 to justify its development.

We are completely opposed to the loss of any social housing in places such as Euston. For HS2 or Crossrail2 to contribute to the growth of London it is essential that complementary infrastructure, which includes affordable housing, is enhanced not contracted.

We would therefore prefer to see a station closer to King's Cross, providing good interchange with the six tube and underground lines.

Tottenham Court Road

17 Do you have any comments about the proposals for a Crossrail 2 station at Tottenham Court Road?

Comments:

This is an important interchange and we are pleased that provision for it was made in developing the station for CrossRail1.

Victoria

18 Do you have any comments about the proposals for a Crossrail 2 station at Victoria?

Comments:

Like Tottenham Court Road, the case for a station at Victoria is overwhelming.

19 Do you have any comments about the proposals for a shaft at Victoria Coach Station, between King's Road Chelsea and Victoria?

Comments:

Not at present - we await the consultation on the future of VCS.

King's Road Chelsea

20 Do you have any comments about the proposals for a Crossrail 2 station at King's Road Chelsea?

Comments:

There clearly needs to be an intermediate stop between Victoria and Clapham Junction to maximise the efficiency of the railway.

King's Road does not offer any interchange but neither would any alternative site put forward by Crossrail2. It is understandable that Battersea would not want their new Northern line station disturbed almost as soon as it opens.

Clapham Junction

21 Do you have any comments about the proposals for a Crossrail 2 station at Clapham Junction?

Comments:

An interchange at Clapham Junction would open up CrossRail2 for a plethora of journeys which are currently more difficult.

We are concerned though that the inadequacy of platforms for the London Overground will need to be addressed. The original platform 1 or an equivalent

provision will be essential to meet rising demand, which will grow further with the introduction of CrossRail2. Indeed, the layout of the whole station needs to be reviewed to ensure that it is capable of dealing safely with the increased numbers of passengers changing trains or entering/leaving the station.

22 Do you have any comments about the proposals for a shaft at Westbridge Road, between Clapham Junction and King's Road Chelsea?

Comments:

no

Balham

23 Do you have any comments about the proposals for a Crossrail 2 station at Balham?

Comments:

There is already a rail link between Clapham Junction and Balham. Tooting Broadway provides a new link, and a more convenient point of interchange with the Northern line. We find it difficult to believe that the ground conditions make it impossible to route the line this way: tunnelling techniques are improving all the time.

we endorse the request of Wandsworth Council for further investigation and report.

24 Do you have any comments about the proposals for a shaft at the eastern edge of Wandsworth Common, between Balham and Clapham Junction?

Comment:

A further benefit of the Tooting Broadway proposal was that a more suitable site for the ventilation shaft had been identified.



25 Do you have any comments about the proposals for a shaft at Weir Road, between Wimbledon and Balham?

This question is also asked in the Wimbledon section of this questionnaire:

no

26 Do you have any comments about the proposals for a shaft within the Springfield development, between Wimbledon and Balham?

Comments:

no

Wimbledon

27 Do you have any comments about the proposals for a Crossrail 2 station at Wimbledon?

Comments:

We agree that a station at Wimbledon would provide a valuable interchange, reducing distances travelled by some passengers.

28 Do you have any comments about the proposals for a tunnel portal at Gap Road, north of Wimbledon?

Comments:

no

29 Do you have any comments about the proposals for a Crossrail 2 depot and stabling facility at Weir Road, between Wimbledon and Balham?

Comments:

no

30 Do you have any comments about the proposals for a shaft at Weir Road, between Wimbledon and Balham?

This question is also asked in the Balham section of this questionnaire :

no

31 Do you have any comments about the proposed turn-back and dive-under facilities at Dundonald Road, south of Wimbledon?

Comments:

no

Broxbourne branch

32 Do you have any comments on the proposals for Crossrail 2 at Broxbourne, Cheshunt and Waltham Cross stations?

Comment:

We agree that these stations are poorly served. We also note that, in the context of the Airport Capacity debate, Stansted has spare capacity and the reason for this is the poor transport links to central London. (Despite that, a higher proportion of Stansted passengers use public transport to complete their journey, compared with Heathrow and Gatwick). Anything which improved Stanstead services, directly or indirectly, is to be welcomed.

33 Do you have any comments on the proposals for Crossrail 2 at stations between Enfield Lock and Tottenham Hale?

Comment:

The current services are a disgrace. Angel Road must be the least accessible station in London if not on the entire Network Rail network. Provision at these stations should be improved far more speedily than will be possible as part of such a large scale scheme as CrossRail2 has become.

34 Do you have any comments on proposals to remove level crossings on the Broxbourne branch and replace with alternative access across or around the railway?

Comments:

Level crossings are inherently dangerous and no longer practical if a reasonable level of train service is to be attained.

South West Branches

35 Do you have any comments on proposals for Crossrail 2 at Raynes Park, Motspur Park and New Malden stations?

Comments:

We agree that it is desirable to extend beyond Wimbledon. It is not clear whether some journeys which can currently be made by direct train from these stations

will be reduced in frequency or expunged altogether. As became clear in the case of Thameslink, people choose the location of their home on the basis of existing train patterns, and are extremely resistant to adverse change.

36 Do you have any comments on the proposals to remove both the level crossings on West Barnes Lane near Motspur Park station, and Elm road near New Malden station, and replace with alternative access across or around the railway?

Comments:

Level crossings have a poor safety record and if there is an intensification of use of existing lines the time taken to navigate them makes them less attractive to pedestrians and other road users.

There is a heavy dependency for the delivery of the homes and jobs in Opportunity Areas on the preparation, scope and quality of Opportunity Area Planning Frameworks and their interpretation and local planning for their achievement by boroughs in amended Local Plans.

There is concern that the skills and resources needed for that level and volume of plan preparation may not be available and timescales could slip. There is also the danger that if there are not plans in place, developers will submit planning applications for land they can acquire for schemes that may not meet the best holistic and spatial opportunities. That could adversely affect transport planning and the delivery of the types of homes that are required in each OA location which boroughs should define and insist upon. The policy should address this issue.

Policy SD1 is supported strongly. However, it has not been applied fully in the past and the status of some Opportunity Areas has not been as clear as the content of SD1 would have provided.

The use of Opportunity Areas is so important that they should be reported upon in the Mayor's Annual Monitoring Report and actions to deal with deviation from plans or targets should be defined. Policy SD1 section A 70 should be modified to 'monitor progress in delivering homes, jobs and infrastructure in OAs and the state of planning for them by boroughs, reporting on the progress of OAs in the mayor's Annual Monitoring Report and taking action where necessary to overcome any barriers to delivery.'

Policy SD1 should have a section 'Local Plans should be modified to define how public open space in Opportunity Areas will be achieved and maintained and existing open space protected.'

In the section which follows SD1, the figures show all Opportunity Areas but below them some of them the ones indicated are not mentioned. Figure 2.7 for the Thames Estuary is an example which shows eight OAs but only five of them are described in the text which follows. All OAs in each section should be described and their key dependencies and potential explained. If there are OAs shown in more than one figure, there should be cross references to the paragraph elsewhere which describes them.

In the current London Plan there are policies for Areas of Intensification and policies for them. In the Replacement London Plan, some of them are now Opportunity Areas but some are not mentioned. There should be a paragraph below SD1 to explain the status of any of the previous Areas of Intensification which are not now OAs.

Many of the OAs were identified up to ten years ago. It is surprising that so many of them are in the nascent state or only now in the ready to grow state. Figure 2.2 states that the timing to maturity of the latter will be ten to fifteen years and that is of concern for the phasing of all housing delivery in the period of the Replacement London Plan.

There should be a paragraph of explanation following Policy SD1 to explain why the state of planning for many OAs is at an early stage and what the Mayor will do to intervene to achieve progress on the ones that could deliver the most housing early and benefit the areas in which they are located.

Page: [Bakerloo Line extension](#)

Section: [Figure 2.4](#)

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

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

The submission was as follows:-

Subject: Proposed extension of the Bakerloo line

1. This response is made on behalf of the London Forum of Amenity & Civic Societies.
2. The London Forum supports the extension of the Bakerloo line. It is more efficient to operate tube lines through the central zone than to terminate within it. There is great pressure on existing bus and rail services in the south-east.
3. We retain some misgivings as to the chosen route, but only because others might bring greater benefits to London as a whole. The suspicion persists that the chosen route owes its success to the potential for private sector contribution to its cost. The aspiration to run to Camberwell has been recognised since 1931. With the possible exception of Essex Road, Walworth Road carries more bus passengers than any radial route in London, and should be the prime candidate for a new Metro service. We do not believe that re-opening the station on Thameslink that gave its name to the public highway, welcome though it would be, adequately meets the needs of Walworth Road and Camberwell.
4. One of our member societies believes there is scope for a cut and cover route along an abandoned canal and the former Southern Railway line via Honor Oak Lordship Lane and Upper Sydenham to Crystal Palace. They and we do not have the resources to work up this option, but the potential advantage of reduced construction costs and in particular those associated with new stations, so that more stations might be provided, should not be rejected without due consideration.
5. The Forum does not perceive there to be any London wide issues arising from the siting of two stations along Old Kent Road. We believe that local opinion should determine how these are resolved. We note the campaign for a third station in Old Kent Road, which would be stronger if a cut and cover extension could be developed, and which forms part of the cut-and-cover proposal.
6. The interchange at Lewisham is very much valued, making the line useful to a far wider catchment area. However, we believe there also needs to be much improved access to the Lewisham Shopping Centre (and the rest of central Lewisham) - the current signalled crossing of Rennell St is inadequate, providing only about 15 seconds of green time (insufficient for the less mobile), and too long a wait before turning green (about 1 minute). Instead, access should be by means of a tunnel from the stations through to the Centre. The timings on the existing surface crossing would have to be vastly improved to make them sufficiently pedestrian friendly to attract shoppers to the new line.

Page: [High Speed 2 / Thameslink](#)

Section: [2.1.55](#)

The West London Orbital Line from Brent Cross to Hounslow mentioned in paragraph 2.1.55 is supported strongly and its feasibility, cost and timescale should be explored at the examination of the Replacement London Plan. Policy content for its delivery should be covered in Chapter 10 T3.

Opportunities for stopping HS1 trains at Straford is not considered in this section of the Replacement London Plan. It would improve transport links and avoid HS2 passengers having to negotiate Euston and St Pancras stations to access HS1 when they could transfer at Old Oak to the Elizabeth Line.

It would also avoid overloading of those Central London stations and should be covered by relevant content in Policy for HS2.

Page: [Central London](#)

Section: [2.1.67](#)

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

Page: [Policy SD2 Collaboration in the Wider South East](#)

Section: [N/A](#)

Paragraphs 2.2.5 and 2.2.8 following Policy SD2 are supported but in 2.2.8 the word 'may' should be replaced by 'should', as in paragraph 2.2.5.

Page: [Policy SD2 Collaboration in the Wider South East](#)

Section: [Figure 2.13](#)

Figure 2.13 needs to have the local authorities around London identified by being numbered and listed.

The words "from the top left" are not meaningful for the map. and the explanation should be improved.

Page: [Policy SD3 Growth locations in the Wider South East and beyond](#)

Section: [N/A](#)

It is stated in paragraph 2.3.3 that there is a capacity shortfall of developable land in London for at least 1,000 homes annually. The intentions covered by the paragraphs through to 2.3.8 are supported for liaison with local authorities around London to address that problem.



However, although the Mayor is conducting talks with the WSE, boroughs may not be clear on their role in conducting their relationship with local authorities surrounding the GLA boundary. The Mayor needs to ensure their activities, negotiations and plans are compatible and supportive of his own objectives.

The Mayor should indicate to outer London boroughs in Policy SD3 how they should best carry out their Duty to Cooperate across the GLA boundary in order to facilitate his objectives for working with the WSE.

Page: [Policy SD4 The Central Activities Zone \(CAZ\)](#)

Section: [2.4.16](#)

There should be a cross reference to Policy D10 for flood risk.

Page: [Policy SD5 Offices, other strategic functions and residential development in the CAZ](#)

Section: [SD5](#)

It is not understood how or why offices and other CAZ strategic functions are given equal weight relative to new residential in predominantly residential neighbourhoods or wholly residential streets, as in SD5 D 3). It would imply possible replacement of housing with commercial uses which would cause problems in the support of local facilities. There may be opportunity for CAZ-type uses in areas where housing could be densified but that should be discussed at the examination of the New London Plan.

Section C of Policy SD6 relates new higher-density development to the current and future accessibility of public transport but the policy does not make clear how the local social infrastructure in the town centres will determine what density should be permitted in new schemes to avoid overloading those facilities. Section I should have the words added at the beginning 'Social infrastructure capacity and services will restrict the new housing and even the commercial developments that can be approved and therefore . . '

It is essential that the Replacement London Plan requires boroughs to consider information on the public transport accessibility level (PTAL) figures for all locations. This information is necessary to plan for where transport should be improved by using whatever funding sources exist to allow more intensification of land use for development. It is also used by boroughs to make decisions on planning applications received to ensure that permission is given only for housing schemes of a density that will not cause overcrowding on transport.

Other advantages of the current London Plan density matrix and its associated advisory paragraphs is that they guide boroughs in assessing new development applications based on the distance from town centre facilities and consideration of the local context and character. Despite the details in the policy of what should be taken into account, the omission of the density matrix does not seem to be necessary.

There should be an additional section in Policy SD6 for 'The traffic associated with waste management collections for businesses in town centres should be coordinated, to avoid road congestion, bus delays and pollution.'

The content of paragraph 2.6.1 are important and should be covered by an additional section in Policy SD6 following 'I' for 'Public squares, markets, parks, gardens and other open spaceson should be planned to meet the local needs and should be well maintained.'

Paragraph 2.6.1 should mention that many town centres are through routes for traffic and there should be a section in Policy SD6 to cover that. It could state 'The movement of vehicles in town centres which have major through routes roads should be considered for implementing traffic diversions and sections that are pedestrianised.'

The use of the word "higher-density" in Policy SD6 A 2) line two is **meaningless** because there is no explanation of what it is of which new density should be "higher". The words "higher-density renewal" should be replaced by 'renewal at optimum density.'

Policy SD6 must accord with other policies in the Replacement London Plan for the density of housing to be "optimised", as in the comments made in this submission for Policy GG2 and which should be considered also here for this comment on Policy SD6, as there are policies about **optimisation** in Policy D2 B, Policy D4 A, Policy D6 A 3), Policy H1 B 2), Policy H12 and paragraphs 3.6.1 and 4.12.2. Those could be quoted as cross references in a paragraph on density following SD6.

To be compatible with those other policies, the words "higher-density" should be changed to 'optimum density' in section C of Policy SD6 also.

It is only when density is **optimised** to relate to local social infrastructure, the accessibility and capacity of public transport and the local context and character that new housing schemes will be sustainable and not cause harm. The current London Plan's density matrix which covered those matters stated that when they are applied, those considerations would result in "sustainable residential quality". That quality must not be compromised by a change in this version of the Plan to the seeking of high densities where they are not appropriate.

Policy SD6 could have another section for 'The impact of major shopping malls like Westfield on nearby town centre businesses should be examined, monitored and mitigating actions taken.'

Page: [Policy SD6 Town centres](#)

Section: [SD6](#)

Policy SD6 F needs a cross reference to Policy D12 Agent of Change.

Page: [Policy SD8 Town centres: development principles and Development Plan Documents](#)

Section: [SD8](#)

Section B 4 of Policy SD8 provides guidance on the considerations for the scope to accommodate new commercial development and higher density housing in town centres. The criteria include public transport accessibility and capacity in B 4) c). However, another criterion should be added 'the capacity and proximity of social infrastructure, shopping and other facilities and services.'

Page: [Policy SD9 Town centres: Local partnerships and implementation](#)

Section: [SD9](#)

Object -

Policy SD9 lacks an essential requirement that local trader/business/professional services associations should be formed in town centres. They can deliver mutual support, a united voice on rents, business rates, street licensing, crime reduction and liaison with community groups and the local authority.

Evidence has indicated that town centre management is better when such associations are in place.

Policy SD9 should have added to the end of the first sentence in section A the words 'including Traders' Associations'.

Object -

Policy SD10 and its associated paragraphs are supported for their aims but the scope of the policies is not sufficient.

There should be reference in Policy SD10 to considering the homes that people have in Local Areas for Regeneration. Exploitation of people experiencing inequality and deprivation has been reported in those areas, caused by landlords of Houses in Multiple Occupation which are overcrowded, poorly maintained and, in some cases, unfit for habitation. The rents that some people have to pay and the lack of space for a normal family life worsens their deprivation and those who have to seek benefits to survive add to the cost to the 'public purse' and result in landlords being subsidised by the State.

Newham council in east London, the first to introduce a compulsory borough-wide licensing scheme for landlords in 2013, shared their names and property addresses with HM Revenue & Customs. LB Newham, which has 27,000 registered landlords, said in August 2017 it understood that 13,000 had not registered for self-assessment, which is generally required if a property owner receives £2,500 a year or more in rent.

The council estimated that unpaid tax by landlords is costing the public purse nearly £200m in London – and far more nationally.

Newham said it has instigated 1,135 prosecutions for housing crimes. It has banned 28 landlords, served 2,170 notices to improve properties, and recovered £2.6m in additional council tax.

Newham has among the highest levels of private renting in the UK. Between 2006 and 2016, the share of the total housing stock in the borough owned by private landlords leapt from 21% to 46%.

Policy SD10 does not mention in section B the housing of people suffering deprivation in such areas but boroughs must take account of private rented sector (PRS) problems which make their lives worse. Policy SD10 section A 2) should have added to its end ', including the types of homes, their tenure and suitability that people in those areas occupy.'

Every borough in London could do what LB Newham has done but too few do so. There should be an extra section D in Policy SD10 that 'Boroughs should include proposals for PRS regulation and monitoring in their local policies to achieve homes fit for purpose. The results should be included in their Annual Monitoring Report.'

Another section E should state 'Boroughs should to prioritise some areas for local regeneration for the supply of social housing to alleviate problems that those on low incomes can experience in the PRS.'

A section F is required that 'No enforced displacement of people living locally in Strategic Areas for Regeneration should be caused by changes and developments made.' Many people suffering inequality and deprivation are in low paid work and are making a contribution to the local economy.

The RTPI published a paper in January 2018 at <http://rtpi.org.uk/briefing-room/rtpi-blog/tackling-poverty-and-inequality-needs-to-take-account-of-place,-not-just-people/> It is important for the proposals it makes for improving the places in which disadvantaged people live.

The report draws on evidence of how problems such as worklessness, low incomes, lack of aspirations, and ill-health are not simply a reflection of individual circumstances but are also a reflection of the social conditions and the opportunities that are available to people living in a particular place. Indeed, many of the root causes of deprivation and social inequality are bound up in the quality of the neighbourhoods, streets, and local economies in which people live. The devastating impacts of welfare reform on the most disadvantaged individuals have been compounded by a policy culture that is neglectful of the unevenness of opportunities within different places. In arguing for a 'return of place' in wider policy thinking, the report contends that a stronger focus on place-based programmes of intervention could do much to reduce poverty, inequality and the social problems that stem from them. Yet the benefits of any place-based approach will only be fully realised if these are aligned with socially progressive and redistributive people-centred policies. To date, the devolution and localism agenda has been overly concerned with maximising opportunities for economic growth but important questions linked to social justice have been neglected.

Policy SD10 should have a section as follows - 'Boroughs should plan to improve the quality of the neighbourhoods, streets, and local economies in areas where there are concentrations of deprivation and disadvantage.'

There needs to be a strong policy focus on equipping them with increased skills to improve their opportunities, as in paragraph 2.10.2.

Paragraph 2.10.5 is supported and is important for developing Opportunity Areas in a way that will benefit the communities living around them, as well as those within the designated areas.

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

Section: [3.1.6](#)

Paragraph 3.1.6 should be expanded to cover 'Car-free developments should be required by conditions where public transport is good, with no right for the occupants of such developments to be able to buy resident parking permits for local Controlled Parking Schemes.'

There should be another paragraph to require that 'Boroughs should ensure that the density of new development is appropriate to the capacity of local infrastructure, particularly public transport to avoid increased congestion on bus, tram, Tube, DLR and Overground routes that could deter car owning families from using public transport.'

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

Section: [3.1.10](#)

Policy D1's associated paragraph 3.1.3 should require that 'All developments must have a plan for dis-assembly of existing buildings, the disposal of demolition waste and the transport to site of building materials.' Wherever possible, movement of materials should be by water, for at least part of their journey, to reduce the movement of construction lorries and their associated air pollution and road congestion.

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

Section: [D1](#)

Policy D1 lacks some content that would improve its aims.

In A 1), 'optimising density' should be cross referenced to policies for housing density and should be related to the public transport accessibility level (PTAL) for each site, which is available to boroughs.

Section D1 B should have a policy requirement that 'New buildings should not harm local and protected views, the outlook from listed and locally listed buildings and World Heritage Sites (WHS) and should accord with the requirements of WHS Site Management Plans.'

Section D1 B should have after the work 'safety' in item 2), ' . . including flood and fire resistance'.

Section D1 B should have on the end of its item 5) ' . . . by the use of sustainable urban drainage and soak-aways for areas of hard surface, such as public open space and car parking areas and for major developments where the re-use of 'grey' water and other sustainable drainage facilities can be provided.'

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

Section: [D1](#)

The content of Policy D1 is supported strongly.

It should be made clear that the content should be the basis on which local planning decisions will be made.

However, some parts could be improved and an 'objection' comment will be submitted to seek changes.



Page: [Policy D2 Delivering good design](#)

Section: [D2](#)

Object - Policy D2 A should have added an item 12) - 'conformity with the design section of the NPPF.'

Policy D2 A 3) should be expanded to cover existing building materials and public realm attributes.

Policy D2 A 4) should have added on the end ' . . and their capacity.' The ability of existing or planned transport capacity to absorb more people travelling and the ease of reaching desired destinations using them should be considered to determine sustainable density of new development, as in Policy D2 B 1) and D2 F 1).

Policy D2 A 7) should include ' . . . and potential harm that may be caused to them.'

Paragraph 3.2.8 should have added the word 'orientation' and that should be explained as important for light to habitable rooms, overlooking, local views and resistance to overheating.

Paragraph 3.2.10 is supported and its importance should be emphasised so that what is approved is actually delivered.

Page: [Policy D3 Inclusive design](#)

Section: [3.3.4](#)

Paragraph 3.3.4 should have additional words to require that there are no 'poor doors' in new developments containing affordable housing units and that, wherever possible, the design of entrances to each group of dwellings is similar and there is no visual difference for housing types.

Page: [Policy D4 Housing quality and standards](#)

Section: [N/A](#)

Policy D4 is supported but could have added a reference in the policy itself to children's play space requirements as in paragraph 3.4.7 and Policy S4.

Page: [Policy D5 Accessible housing](#)

Section: [N/A](#)

Policy D5 is generally supported but it is deficient on one aspect of accessibility. It could benefit from an additional section which requires that 'Boroughs should consider the access into and out of housing developments and the quality of the route from them to bus stops and to local infrastructure facilities to ensure that people who are disabled have equal chances as others to lead a satisfactory life in the community without unnecessary help.'

Page: [Policy D6 Optimising housing density](#)

Section: [D6](#)

Policy D6 needs some improvement for continuity of policy from the content of the current London Plan and the approach that boroughs have been required to take by it to housing density.

At the end of Policy D6 A 2) should be added 'See Figure 4.2.

In Policy D6 A 3), the 'capacity of surrounding infrastructure' is an inadequate consideration. The distance from new developments of the services that new occupants will require is important and should restrict the density of additional housing until more facilities nearby can be provided. If that is not done, there could be a need for people to use their cars, contrary to policies in the Replacement London Plan to achieve modal switch and avoid increased road congestion and air pollution. There could also be problems for people on low incomes to access those facilities.

Paragraph 3.6.5 applies but its words are policy and should be within Policy D6 A.

Policy D6 C does not make clear that the three criteria in it are those that require a referral of a planning application to the Mayor. The words ' . . . submit a management plan if the proposed density is above: ' should be replaced by ' . . . submit the application to the Mayor, together with a report on the implications and a management plan, if the proposed density is above: '

In this section D6 of the Replacement London Plan it should be made clear what is stated about PTALS in the Glosary Appendix 3 - "A limitation of PTALS is that they only reflect access to the public transport network, but not the opportunities and services reachable through the network." The policy should include a statement on that so that difficulties in reaching destinations and any overloading of links to required transport interchanges are taken into account in deciding the numbers of additional residents in the locality that would be sustainable. This is covered by paragraph 3.6.3 but should be mentioned in D6 A 2).

Policy D6 A 2) contains two 'considerations' and they should be separated.

The absence of a density matrix makes it more difficult to see visually and to apply to applications the full criteria that are explained in the current London Plan. The reason for the omission of that matrix should be explored at the examination of the Replacement London Plan.

Policy D6 D should also require provision of the amount of private amenity space and children's play space expressed in terms of the number of expected occupants, as in Policy D4. The Mayor should publish a minimum standard for those aspects of a housing development.

To paragraph 3.6.1 should be added additional references to Policies SI15 and SI12.

Paragraph 3.6.3 should propose that 'Where PTAL is high, consideration should be given to car free developments where new occupants of them are not allowed, by conditions, to purchase resident parking permits in nearby Controlled Parking Zones.'

Page: [Policy D7 Public realm](#)

Section: [D7](#)

There should be reference in Policy D7 to Policy E9 B 7) on London's various types of markets and their importance for communities.

Page: [Policy D8 Tall buildings](#)

Section: [D8](#)

Policy D8 B should be modified to include 'Boroughs should identify by Site Allocations or other entries in their Local Plans where tall buildings would not be appropriate.' That accords with the current London Plan Policy 7.7 E.

In Policy D8 C 1) d) the last sentence should apply to all locations, not just ones with heritage assets. The sentence should be an additional item in this 'Impacts' section and should have added on the end 'and not cause harm'.

Policy D8 C 1) e) should have added 'and should conform to the requirements of each WHS Management Plan.'

Policy D8 C 1) should have a reference to paragraph 3.8.2 for which applications for tall buildings should be referred to the Mayor.

Policy D8 C 1) should have an additional section to state 'Tall buildings should not carry advertising panels.'

In Policy D8 C 2) a) the words 'particularly in the case of fire.' should be added at the end.

In Policy D8 C 2) d) the following words should be added at the end - 'If the capacity of social infrastructure and public transport is not sufficient, the development may need to be phased.'. That would be consistent with other parts of the Replacement London Plan where consideration is given to the access and capacity of services, facilities and public transport, [as in Policy D6 B 3)]

In Policy D8 C 2) e) the words 'planned for funding,' should be added before the word 'delivered'.

In Policy D8 C 4) a) the following words should be added 'A cluster of tall buildings should allow each one to have its own identity visually and not to merge into one building mass.'

Page: [Policy D9 Basement development](#)

Section: [3.9.2](#)

Paragraph 3.9.2 needs clarification that permission is needed for basement development in almost all cases as a result of a Court decision on a basement development in LB Camden that excavation for basements is an 'engineering operation' needing assessment and control.

Page: [Policy D10 Safety, security and resilience to emergency](#)

Section: [3.10.2](#)

Paragraph 3.10.2 should have the words 'in both design and management.' replaced by 'in design, materials used and management.'

Page: [Policy D11 Fire safety](#)

Section: [D11](#)

Policy D11 A 4) should be modified to read 'develop, update periodically and publish regularly in all blocks of flats a robust strategy for evacuation in which all building users can have confidence.'

Policy D11 B should have an additional requirements for 'how maintenance and modifications should be conducted in order not to compromise the fire protection between sections of the building' and

'what sprinkler or other fire suppression systems are incorporated'

'what alarm systems are fitted for awareness of residents of danger'

Page: [Policy D12 Agent of Change](#)

Section: [D12](#)

Policy D12 is inadequate in that it seems to cover only noise that existing developments and businesses could cause to those living in new developments and noise problems from the introduction of new uses.

That fails to cover odours from existing uses, vibration from local activities or underground rail lines, light pollution, air pollution and excessive movements of vehicles from existing or new uses that would cause disturbance at times of day or night or congestion on roads. Those potential causes of restriction of development or mitigation should be covered in the policy.

Page: [Policy D13 Noise](#)

Section: [D13](#)

Policy D13 could cover one of the most annoying aspects of noise and that is **within** buildings. Pubs restaurants and other places for meeting, leisure and shopping should be designed and inspected for the prevention of echoing noise. Conditions should be placed on change of use and on new licences for the fitting of acoustic facilities that will reduce the volume and impact of sound generated by people talking and by 'background' music being played.

Page: [Policy H1 Increasing housing supply](#)

Section: [H1](#)

In consideration of the housing crisis as explained in paragraphs 1.4.1 to 1.4.3 and the words in paragraph 4.1.3 about the low rate of delivery of housing, it is surprising that the need for affordable housing does not appear in this section until paragraph 4.2.12. There must be much more and early emphasis in this text on delivering homes to rent at prices people in the location can afford.

The lack of homes to rent at prices people on low to medium incomes can afford is one of the biggest problems in London.

Policy H1 should have content that makes that quite clear. For years, the wrong type of housing has been delivered. The Mayor's annual monitoring reports have shown an excess of delivery of market housing compared with need and the ability of Londoners to afford to buy them. Many have been sold off plan to overseas buyers as investments and left empty.

The Mayor's annual monitoring reports have shown also delivery of less than half the affordable housing that has been required. A lot of the affordable housing that has been delivered has been for shared equity which is too expensive to obtain for people unless they are on high incomes. In 2015/16 only 17% of homes delivered were affordable. Of those, 10% were social rent or low cost affordable rent homes and the rest were intermediate homes usually sold on a shared equity basis. This situation must not be allowed to continue.

**This chapter would benefit from having paragraphs 4.1.1 to 4.1.8 placed at the beginning, before Policy H1.** After the content of 4.1.8 there should be a paragraph introducing Figures 4.2 and 4.3 both of which should also be in the text before Policy H1. See the comments below for suggested changes to paragraphs 4.1.4 and 4.1.6.

Figure 4.3 - Proximity to town centres - is not easy to read. The PTAL map and statistics in Figure 4.2 is explained as being available to boroughs at a local level from the GLA web site for application in determining planning applications. Such information on proximity to town centres should also be available from the GLA at a local level and the source should be given in the draft Replacement London Plan.

Paragraph 4.1.4 summarises the content of the Mayor's Housing Strategy but **there should be a paragraph following that** to summarise the policies and targets for affordable housing and its types described in the Mayor's Affordable Housing and Viability SPG. That should be placed before Policy H1, as above.

Paragraph 4.1.6 should have the word "Londoners" replaced by 'people who live or work in London or wish to locate in the capital.'

At the foot of Figure 4.2 for PTALS there should be a reference to the entry on PTAL in the Glossary.

Policy H1 needs an additional requirement in part A, as follows. 'Boroughs should plan for the mix and type of homes sought within the total housing targets. Completions of affordable housing of the types described in the Mayor's Affordable Housing and Viability SPG are important and the necessary quantities within the overall housing targets should be sought in local plans and in decision making. See Policy H5 on Affordable Housing.'

Policy H1 B 2) a) should have the words 'walking distance' after "800m".

Policy H1 section D should have added after " . . Table 4.1" the words 'and the affordable housing content to meet their local needs.'

Following Policy H1 section E (which seeks to exploit increased public transport accessibility) there should be a paragraph as follows. 'Where PTALs are below 2, boroughs should consider restricting or phasing development or limiting housing density until PTAL levels can be improved in order to avoid congestion on existing public transport.'

Policy H1 2) a) should have an additional sentence on the end - 'See Figure 4.2 for PTAL and the Glossary for details of where PTALS for each location can be found. See also Figure 4.3 for proximity to town centres.'



Policy H2 D 2) d) to encourage infill development within the curtilage of a house is **not** acceptable. It would encourage the 'Beds-in-Sheds' developments with which boroughs in West London have had problems. Back garden development should not be encouraged unless the plots are large and can be divided.

The loss of green space would be contrary to the policies for urban greening.

The low quality of many existing back garden accommodation units and the overcrowding in them led to Government policy to oppose them and to urge Councils to take action against rogue landlords who were often exploiting people living in them. The Government clampdown was published at <https://www.gov.uk/government/news/major-clampdown-launched-on-beds-in-sheds>. It made clear the issues that LB Ealing had had to tackle.

That part of the policy should be removed on back garden development because the potential adverse living conditions and low standards would be contrary to policies to reduce deprivation, achieve equality and to deliver Good Growth.

The content of H2 D 1) would suffice for development of sites that deliver sufficient land without adverse effect from development of one or more houses, as required by paragraph 4.2.8.

There is a possible **conflict** in the Policy H2 D 2) b) for home extensions with Policy H2 F 3) which states that there should be net additional housing plus Policy H2 F 5) for additional housing to be self contained. That would imply that home extensions must deliver a self contained annex or flat for sale or rent. Policy H2 D 2) b) should state that as a condition.

There should be an additional paragraph of explanation following Policy H2 as follows. 'The increased density achieved by Policy H2 D 2) b) and c) should deliver additional homes wherever possible. Residential conversions should be achieved in a way that ensures Houses in Multiple Occupation are of suitable construction and contain dwellings of size that accords with local policies and will offer security of tenure.'

In Policy H2 F add another restriction 'conservation areas'

The last sentence of paragraph 4.2.5 should be **removed**. It is contrary to policies for heritage, conservation areas and listed buildings. It could be replaced by 'This should be done in consultation with local people and in a way that does not harm the qualities that make places special for the community.'

Paragraph 4.2.12 is supported strongly. Developments for which it is not achieved should be referred to the Mayor.

**Policy H2 H conflicts with Policy H5 B and paragraph 4.5.5. This must be considered at the examination of the plan unless corrected by the GLA before it is held.**

Page: [Policy H3 Monitoring housing targets](#)

Section: [4.3.3](#)

Policy H3 should have an additional section, as follows. 'Boroughs should monitor and report the percentage of new homes delivered that are affordable within the types detailed in the Mayor's Affordable Housing and Viability SPG and Policy H5.'

Page: [Policy H5 Delivering affordable housing](#)

Section: [H5](#)

In Policy H5 the figure of 50% in various places is wrong. According to paragraphs 1.4.3 and 4.5.1, 43,000 or 43,500 new homes annually should be "genuinely affordable." That is 65% or more of the 66,000 additional homes required each year as shown in Table 4.3.

One of those two numbers for annual affordable homes should be changed so that the same figure is used throughout the Plan.

H5 must show the SHMA requirement of 65% of all homes to be affordable in each of its sections.

The Mayor's target of 50% quoted would not deliver the amount of affordable housing, so the requirement of the NPPF to seek to meet objectively assessed need is not met.

There should be explanation in or with Policy H5 on how the 15% shortfall of affordable housing will be planned and delivered. Leaving it to the boroughs to decide what type of affordable homes should be delivered in 40% of the total is unlikely to make up the shortfall, particularly if developers continue to exceed the 35% that is supposed to be the figure for market housing.

In Policy H5 A 4) there is an unrealistically low and unacceptable target of 50% of affordable homes on publically owned land. The figure should be 75% minimum. If land that developers have bought at land values reflecting its potential for housing can deliver 50% affordable homes, then land which is at existing use values and developed as such should be able to deliver higher percentages of affordable homes.

**Policy H5 B conflicts with Policy H2 H and paragraph 4.5.5 for whether or not affordable housing should be provided on site.**

Page: [Policy H6 Threshold approach to applications](#)

Section: [H6](#)

**In Policy H6 B 2) the figure of 50 per cent affordable housing for public sector land is not a sufficiently challenging target.** Such land should be developed at existing use values and should deliver **at least 75%** affordable housing. In addition, the types of affordable housing delivered on public sector land should be predominantly a mix of the lowest cost rent homes (general needs rented accommodation) and London Living Rent homes, as in the Mayor's Affordable Housing and Viability SPG and in Policy H7 and Table 4.3.

Shared ownership affordable homes would be supplied on other developable sites.

As explained in paragraph 4.6.5, public sector land should deliver the homes that are needed by "London's essential workers." Most of them will be on incomes that would allow them to rent only low cost homes. The figure of 50% in paragraph 4.6.5 should also be 'at least 75%.'

Public sector land should be developed by TfL and by boroughs and not sold to house builders who will require their usual profit levels for housing delivery. The EUV+ for public sector land should be a minimum site premium.

Page: [Policy H8 Monitoring of affordable housing](#)

Section: [H8](#)

Policy H8 should have added a section following C for 'Boroughs should monitor the percentages of the different types of affordable housing they have approved and the number that have been delivered.'

Policy H8 D should become E and have "A-C" replaced by 'A-D'

Page: [Policy H10 Redevelopment of existing housing and estate regeneration](#)

Section: [H10](#)

Object -

Policy H10 refers to the need to maintain equivalent "floorspace" in developing existing housing. That is **not** an acceptable measure because it could result in a net loss of affordable homes, if larger units are built to replace existing ones.

The policy should require, instead, that there is no net loss in the number **and type** of housing units as a result of redevelopment.

Policy H10 C has the words "where social housing is lost" but there should **not** be such a loss. The aim in estate regeneration should be better use of land and intensification which should deliver more social housing units. That is particularly important because almost 80% of the backlog unmet need in London for affordable homes is for lower rented ones and the SHMA shows 30,972 low cost rent homes (47% of total) are required annually.

Policy H10 needs improvement to ensure that any redevelopment of existing housing, private or publically owned, results in the delivery of more of the types of homes that were there before.

Page: [Policy H12 Housing size mix](#)

Section: [H12](#)

Policy H12 B seems to be in conflict with Table 4.3 for 2017 SHMA which requires over half of all new housing to have only one bedroom. Paragraph 4.12.4 also supports the need for one and two bedroom units.

Paragraph 4.12.7 for Houses in Multiple Occupation should require boroughs to monitor the registration of landlords and the quality of the accommodation provided. They should also take action where there is overcrowding.

**Discounted Market Rent** (DMR) should be described in the Glossary.

Provision should be made in Policy H13 for Build to Rent developments to include homes to rent that are below the rent of the Discounted Market Rent (which "should be affordable to households on incomes of up to £90,000", as in paragraph 4.7.8). Build to Rent should be able to deliver a few homes at rents suitable to those earning £60,000 annually or less.

Clearly, Discounted Market Rent homes are not at a "genuinely affordable rent" for most people and the word 'genuinely' should be deleted from Policy H13 A.

Build to Rent homes should include some for those earning below £60,000. Paragraph 4.13.6 allows that flexibility.

Policy H13 B 20 states that there should be a "covenant for at least 15 years". That is supported. However, the Government has implied that Build to Rent is a stepping stone to home ownership and the Right to Buy should apply after ten years. There is no implications of that in this draft New London Plan but the last section of section A of Policy H13 should state that 'Affordable housing **delivered by Build to Rent** should be secured in perpetuity as homes to rent.'

To Policy H13 B should be added an additional criterion 'the homes should not be sublet at any time or attempted to be sold on the open market.'

**It is of concern that paragraph 4.13.11 allows CIL relief because all housing developments need to contribute to the social and other infrastructure that their occupiers need.**

The requirement in paragraph 4.13.12 that boroughs could be "supporting institutional investment on public land, including exploring the use of joint ventures or deferred receipts." is supported but the word "can" in line one of paragraph should be replaced by the word 'should'.

Page: [Policy H17 Purpose-built student accommodation](#)

Section: [H17](#)

Policy H17 should contain a description of how a "student" should be identified.

Page: [Policy H15 Specialist older persons housing](#)

Section: [4.15.1](#)

Paragraphs 4.15.1 and 4.15.9 indicate the large size of the requirements for specialist accommodation for elderly people and those with dementia.

Sites identified under H15 A should be protected for specialist older persons housing and that for people suffering from dementia. The policy should state that.

There should be an additional section D in Policy H15 to state 'Boroughs should report in their Annual Monitoring Reports the percentage of the target number of specialist C3 housing they have delivered against the targets in Table 4.4.'

Page: [Policy S1 Developing London's social infrastructure](#)

Section: [S1](#)

Section B could have added 'Co-operation with neighbouring local authorities will ensure that social infrastructure is considered on a wider area than each borough.'

See comment on paragraph 5.1.3 to support that.

Page: [Policy S1 Developing London's social infrastructure](#)

Section: [5.1.3](#)

Paragraph 5.1.3 is inadequate in its scope. It should propose that boroughs consider social infrastructure across local authority boundaries.

It should have added the words 'Boroughs should consider social infrastructure assessment and enhancement in co-operation with adjoining local authorities within and (for outer London boroughs) with planning authorities around London.' That will ensure that a sub regional view is taken of the facilities that residents will require and access to them is reviewed across LPA boundaries. Progress in meeting social infrastructure needs should be included in boroughs' annual reports.'

That would make it similar to Policy S3 A 1) for education and childcare facilities.



Page: [Policy S1 Developing London's social infrastructure](#)

Section: [5.1.4](#)

Paragraph 5.1.4 lacks a criterion for social infrastructure replacement.

At the end of " . . . neighbourhood it serves" add 'and is no further or difficult to reach than the facilities lost.'

Page: [Policy S2 Health and social care facilities](#)

Section: [S2](#)

Policy S2 is supported.

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

Section: [S3](#)

Policy S3 Education and childcare facilities lacks a restriction in the planning for schools.

Policy S3 B should have an additional item 4) as follows 'avoid encroachment on Metropolitan Open Land and other green spaces for the provision of schools. See Policy G3 Metropolitan Open Land.'

Page: [Policy S4 Play and informal recreation](#)

Section: [S4](#)

Policy S4 Play and informal recreation lacks consideration of cross-boundary facilities.

Policy S4 A 1) should have added to the end 'including that which is easily accessible across borough boundaries.'

Page: [Policy S5 Sports and recreation facilities](#)

Section: [S5](#)

Policy S5 Sports and recreation facilities is supported.

Page: [Policy S5 Sports and recreation facilities](#)

Section: [Figure 5.1](#)

Table 5.1 - **Walk London Network** would benefit from having marked on it some public transport stations on or near to the walking routes shown (or the key ones given in the Glossary). That would encourage people to visit locations away from their homes to explore part of the walks and improve fitness.

Page: [Policy S6 Public toilets](#)

Section: [S6](#)

Policy S6 for public toilets is supported.

Page: [Policy S7 Burial space](#)

Section: [S7](#)

Policy S7 for burial space is supported.

Page: [Policy E1 Offices](#)

Section: [E1](#)

Policy E1 for offices lacks mention of an important type of workspace.

Policy E1 B should have added '. . . including work space for voluntary enterprises that are part of the social infrastructure services in the area. See Policy E3 for affordable workspace.'

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

Section: [Table 6.2](#)

Table 6.3 - Strategic Industrial Locations should have added for LB Hounslow the Power Road Industrial Estate in Chiswick, London W4 which is part of the borough's proposals for development of the Great West Corridor (the 'Golden Mile').

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

Section: [E7](#)

Policy E7 is supported.

Page: [Policy E9 Retail, markets and hot food takeaways](#)

Section: [E9](#)

Policy E9 is supported.

Page: [Policy E10 Visitor Infrastructure](#)

Section: [E10](#)

Policy E10 F is incomplete. It is not only the need to avoid compromising housing provision in the supply of short term lets but it is important, as explained in paragraph 6.10.4, "that the impact such provision can have on traditionally residential areas is addressed."

Those words should be in section F of the policy because short lets can result in such properties being overcrowded and they can be used for parties. That section of the policy should have added also 'Local environmental health officers should respond quickly to any nearby resident's complaint about noise or antisocial behaviour associated with short term lets.'

Sadiq Khan wrote to the Government on his concerns about short term lets and the London Assembly investigated the issues, led by Tom Copley AM. The Mayor has asked all short term letting agencies to **"ensure that customers of yours who want to let properties in London on a short-term basis for more than the 90-day annual cumulative limit are restricted from doing so through your website, unless they can prove that they have the relevant planning permission."**

Policy E10 F should also have words added to require that 'Boroughs should check that short-term lets are for a maximum of 90 days.', as AirBnB have now agreed to impose.

Page: [Policy E11 Skills and opportunities for all](#)

Section: [E11](#)

Policy E11 is not as comprehensive as the policy on this subject in the current London Plan (FALP) Policy 4.12 which covers reducing the need for long distance commuting, building on higher education institutions, tackling the cost and availability of childcare, addressing labour market discrimination and the mismatch between labour supply and demand in terms of education, skills or other barriers to success in a changing economy, focusing particularly on key target groups and communities living within London's most disadvantaged areas. Also, ensuring that an adequate mix of businesses and public services (and therefore employment opportunities) are provided close to those communities who particularly benefit from local jobs. Cross references were given to key parts of the Economic Development Strategy for getting people into work.

Policy E11 should be enhanced with such policies or the current momentum will be lost.

Page: [Policy HC1 Heritage conservation and growth](#)

Section: [Figure 7.5](#)

Consideration should be given to including in Figure 7.5 the Turnham Green Battlefield of a conflict in the Civil War - see <http://www.battlefieldstrust.com/resource-centre/civil-war/battleview.asp?BattleFieldId=83>

Page: [Policy HC1 Heritage conservation and growth](#)

Section: [7.1.4](#)

Policy HC1 is supported but paragraphs following it need to be improved.

Paragraph 7.1.4 should have the words 'boroughs' character appraisals, conservation plans and local lists' changed to 'boroughs' character and context analyses, conservation area appraisals and related management plans, local heritage lists and Assets of Community Value'

The words 'and decisions.' should be added at the end of the paragraph.

Page: [Policy HC1 Heritage conservation and growth](#)

Section: [7.1.5](#)

Paragraph 7.1.5 should have the words 'understanding of the heritage values of a site or area' changed to 'understanding of the heritage values of a listed building or site or area'

Page: [Policy HC1 Heritage conservation and growth](#)

Section: [7.1.5](#)

Paragraph 7.1.5 should have the words 'understanding of the heritage values of a site or area' changed to 'understanding of the heritage values of a listed building or site or area'