

My comments

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There is insufficient focus on equality and equality issues in the draft plan, these should be a central component of the plan, a vital thread running through all the topics and policies, and made explicit throughout

Although there is an Easy Read version of the plan, it is not easily accessible -for example the fact of its existence should be clearly signposted from the main draft plan document itself, and copies taken to consultation events as a matter of routine not only if someone specifically requests it

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All the comments submitted under the client HEAR CIO are submitted by the HEAR Equality and Human Rights Network as a composite summary of the comments and views of members of the network, and not the views of HEAR CIO itself, which exists to present the varying views of members and does not hold organisational positions on specific issues itself

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The Plan should be more directive, for example stating 'must' instead of 'should' in many places to ensure that the policies are strengthened and are less advisory

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There should be better links between the different chapters of the Plan and a more joined up approach

There should be more explicit and clearer links between the Plan and the various Mayoral strategies and in addition it would have been preferable to have consulted on the Plan before the strategies as the Plan is high level and the strategies contain the detail -the housing strategy for example is closed for consultation but contains the detail of the higher level plans in the housing chapter; there is concern that points related to the housing strategy won't be acted on as the consultation is now closed

Page: [Policy D3 Inclusive design](#)

Section: [3.3.2](#)

Navigable safe pedestrian routes are not just pedestrian traffic free routes, if spaces are very wide and open with features such as street furniture etc these can be more unsafe than standard pavements and streets

Tactile paving is vital and should be standard at all road crossings, steps etc; where possible it should extend further across pavements to indicate the location of crossings, however it should not be too raised as otherwise people with mobility impairments may find it a hazard

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Section: [3.3.4](#)

Revolving doors can be hazardous and should be avoided if possible

Whilst entrances that can be used by everyone independently are to be welcomed this is not always possible as there are situations where different people with different impairments have different needs, for example someone with a visual impairment cannot locate a press button to open a door which would be suitable for a wheel chair user, if there are different entrances provided they should be adjacent to each other and lead into exactly the same space once inside

Lifts should always be provided, irrespective of how many floors a building has, and these should have spoken floor announcements

Alongside better physical accessibility in buildings staff directing the public should have training about how to assist people with impairments or other mobility needs, for example not pointing without use of words when a visually impaired person asks for directions; the user led voluntary and community sector should be commissioned to provide suitable training in public buildings

Page: [Policy D7 Public realm](#)

Section: [D7](#)

There are concerns that redesign of the public realm may render certain spaces less accessible or inaccessible for certain groups including disabled people, older people, those with mobility or sensory impairments, those with young children and others

For example the pedestrianisation of Oxford Street must take into account access to shops and other facilities for people who are less mobile and cannot walk long or even medium distances

Similarly shared space can be extremely intimidating for many people, who cannot move about safely near vehicles, cycles etc

Many people report that 'no go areas' are developing for some Londoners because of shared space, cycle lanes, floating bus stops, pedestrianisation etc

Another example is the More London pedestrian area which contains central water features, whilst these are attractive for visitors they can make walking through to City Hall difficult for some, and could have been better planned, particularly as there is no option but to walk as there is virtually no vehicle access (this is just cited as an example)

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

Section: [H5](#)

The Plan should have greater strength to challenge developers who seek to circumvent targets on affordable housing or use tactics to alter mixes or provide housing in the mix that is not truly affordable

The Plan should not just be about affordable housing but greater provision of social housing, which is vital for the housing provision in London

Affordability must be more clearly defined, the definition must be explicit in the Plan itself and not just via referring to the Housing Strategy, which has already closed for consultation

The new housing policy will force councils to ballot residents on housing estates earmarked for demolition if they are to secure GLA money for the work.

It is acknowledged that there has been a recent change in affordability meaning in the London Housing Strategy:

4.18 The Mayor does not consider 80 per cent of market rents to be genuinely affordable in most parts of London. That is why, through his Affordable Homes Programme, the Mayor is supporting delivery of London Affordable Rent homes with benchmark rents based on social rent levels.

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Concerns are raised that this isn't conveyed properly in the London plan and that it should be more clearly linked.

Affordable for whom? many schemes such as shared ownership are branded as affordable but in fact are not affordable for most people, with mix of rent, mortgage and service charges. There are also concerns about how shared ownership properties can be sold.

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

Section: [H10](#)

Replacement of floorspace levels and affordability cannot be the only criteria when individuals, communities and families are displaced and might not be able to return, losing links with local neighbourhoods, support networks, work and education opportunities and risking loss of cultural association with place, places being appropriated with for example loss of markets, community groups etc

Language and other barriers can make challenging such decisions difficult or impossible.

Ex industrial land is being used to build so-called affordable homes (example in Greenwich) but doubts that this housing is affordable for most Londoners

Lack of genuine consultation with residents prior to redevelopment, people often presented with completed plans as a fait accompli

Policies can widen inequalities by making certain areas completely unaffordable

Need to consider all facilities and amenities in an area in planning, eg shops, schools, health services, open space etc

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

Section: [S1](#)

There is too much emphasis on buildings and physical spaces and not enough on organisations, people, community and social capital

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

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The role of the voluntary and community sector, both formal and informal, in building a strong social infrastructure is missing in the Plan and recognition of its vital role, and real concrete support, is essential for any social infrastructure planning.

One important element is the provision of meeting spaces and workspaces for the sector and communities they support and work with, spaces that are accessible, local, affordable, appropriate and inclusive.

Pubs are often mentioned as needing protection in planning but not everyone uses them and other community meeting spaces are also of vital importance.

Meaningful participation by the community should be built into all planning, not tokenistic

Page: [Policy E3 Affordable workspace](#)

Section: [E3](#)

The voluntary and community sector, both funded and unfunded, is vital to London's social infrastructure, and it is vital that organisations and groups have access to affordable work space and meeting space, to enable them to continue to deliver vital services and support to London's communities both now and in the future; the Plan and the Mayor should be doing everything possible to ensure this access; this should include working with boroughs to make clear how groups can access the spaces there already are in an equitable manner to ensure that 'those in the know' are not the only groups to benefit

Page: [Policy S16 Digital connectivity infrastructure](#)

Section: [S16](#)

When considering digital connectivity those with little or no access in homes to broadband and digital services must be considered, provision of free public wifi, planning of access areas in public buildings, some compulsion of social landlords to provide access to fibre and high speed services to reduce inequality of access

Page: [Policy T5 Cycling](#)

Section: [T5](#)

Provision for cycling must not be at the expense of pedestrians including older and disabled people and others with mobility problems or sensory problems who have to navigate cycle lanes which can be dangerous to cross - including access to 'floating' bus stops, this can discourage people from walking or taking the bus

Page: [Policy T5 Cycling](#)

Section: [10.5.1](#)

Again this encouragement of cycling must not be at the expense of pedestrians, bus users, disabled and older people, those with young children, mobility problems, cycle lanes can make some streets dangerous and intimidating