

General Comments on the draft new London Plan

In the foreword of the new London Plan (LP) the Mayor acknowledges that “some of the very richest and very poorest people in the country live in London with a disparity in life expectancy between boroughs of 19 years” (p xiv). The LP affirms it will represent a step change from previous iterations in its approach and will be a blueprint for sustainable, inclusive growth. It makes repeated reference to “genuinely affordable homes”. Growth is predicted to be around 70k/year however given the uncertainties around Brexit and proposed government policies for the ‘northern powerhouse’ and HS2 links to Birmingham this assumption could prove to be exaggerated. The LP doesn’t clearly define either what a Londoner is or what “good growth” looks like, other than what it doesn’t mean i.e. one that does not exclude Londoners or contribute to a lack of community cohesion and social integration.

The LP foreword rightly states that there is no quick fix to the housing crisis but makes no reference to macro issues like the dysfunctional housing market or the fundamental contributory factors of national housing and planning policies. These include the reduction of supply side housing subsidies, restrictions on Local authority borrowing for council housing and the national planning policy framework (para 173) which enables minimal social housing on confidential and sometimes bogus development viability figures.

The NPPF introduced in 2010 by the Coalition Govt abolished the regional development agencies in previous planning governance structure apart from London. This has resulted in the inability to force any of the home counties with their huge amount of London commuters having to share the burden of addressing housing need. Combined with the ongoing sanctification of the green belt this puts unrealistic pressure on generating housing supply by increasing densification within the GLA area. A paradigm shift is needed to resolve the housing crisis and it is disappointing the LP doesn’t recognise this.

Whilst clearly the Mayor’s powers are limited nevertheless the chronic housing crisis needs a radical approach to resolve it, which disappointingly is not evident in this document. The LP appears to actually facilitate maximising rather than optimising development and critically its definition of “genuinely affordable Housing” represents a significant increase in existing social rent and is unrecognisable to low income households.

In my humble opinion the general strategic direction of the draft new LP which is design led rather than plan led will not only fail to improve the wellbeing or meet the housing needs of low income Londoners, but will in fact negatively impact those demographics. The premise of the new draft LP is that the proposed development model can ‘work for everyone’ and reduce inequalities. However an important issue such as rising inequality gets very limited reference in the LP policies. The Mayor’s affordable rent products (critical to the viability of the plan) will exclude low income Londoners in new developments, hinder community cohesion and will aggravate social integration.

Comments on Policies:

Chapter 1:

The term 'good growth' is not specifically defined but implied to include protecting the green belt when in fact it has been argued by many (including former Planning minister Nick Boles) that some incursion could be justified and indeed the NPPF allows councils "*where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the green belt, in order to meet longer-term development needs (NPPF para 85).*

GG1 and GG3: High density housing is arguably anomalous with these policies. The London Plan must incisively act to bring air pollution down to safe levels. GG4: This policy should prioritise meeting the identified housing need for social rented homes.

Chapter 2

Policy SD 10 2.10.3 (p93) in the supporting text should be in the primary shaded section. Adequately resourced and accountable local community participation should form an essential part of the process. Lifetime Neighbourhoods should be central to achieving sustainable development.

Chapter 3

Policy D2 *Delivering good design*

Part A: To identify an area's capacity for growth and understand how to deliver it in a way which strengthens what is valued in a place: This growth needs to be sustainable and inclusive of existing communities. The policy needs to acknowledge the legal framework for inclusion and participation embracing the 'Sedley' principles to ensure effective and inclusive community participation. All policies require relevant social impact assessments and strategic environmental assessments.

Part B: Determining capacity for growth

LP Policies 3.2.2 & 3.2.3 (pp104-5) to be included in this shaded box section

As the London Plan is for 25yrs unknown potential factors like the outcomes Brexit, more regional development in other parts of UK and a potential crash in London's overheated housing market, the possibility of a decrease in the population of London should be included in growth appraisals.

Part D: Design quality and development certainty

An obligatory quality framework that provides a system of checks and balances should be established for each development and implemented and monitored throughout the scheme. Independent experts and specialists should be appointed to evaluate the framework and inspect/monitor from start to finish to ensure that quality is being enforced.

When completed the development needs an effective management policy as defined within the framework.

Policy D3 Inclusive design

The Lifetime neighbourhood's policy should be included in the London Plan. Developments should maximise the opportunity for community diversity, inclusion and cohesion and meet the needs of community at all stages of people's lives.

D A 3 (p 106) “ ..designed to incorporate safe and dignified emergency evacuation for all building users. In developments where lifts are installed, as a minimum at least one lift per core (or more subject to capacity assessments) should be a fire evacuation lift suitable to be used to evacuate people who require level access from the building.” should be tempered with a number of issues that prevent the effective use of lifts including:

- potential exposure to smoke, gases or other harmful substances while waiting for a lift
- lift and escalator availability, reliability and failure modes
- human factors, such as exit choice behaviour, particularly where phased evacuation strategies are adopted

Policy D4 Housing quality and standards

D 4 F Access to natural light is a vital part of a healthy environment. Sensitive design shall both provide sufficient daylight and sunlight to new housing and avoid obstruction and overshadowing of existing homes nearby. Design features must remain within the BRE guidelines as per BR209 good practice guide including: Overlooking, Loss of light to existing buildings Rights to light, daylight and sunlight to new developments, sunshine in gardens and open spaces, solar dazzle, electric lighting pollution from proposed developments and infrastructure, and overshadowing of solar panels on nearby buildings, or on the proposed development itself.

Policies (p112-3) in supporting text (3.4.3; 3.4.7; 3.4.8; 3.4.9 and 3.4.10) should be included as well as some of the bullet point qualitative aspects in 3.4.11- e.g.-design meets challenges of changing climate, convenient and effectively designed waste disposal & recycling facilities, ease of window cleaning/maintenance by residents, cycle storage

Policy D5 Accessible housing

Whilst it clearly can't be a legal requirement of the plan, an advice note to ensure aids and adaptation's are maintained as a permanent feature of the affordable housing units in all new development. LA's currently frequently remove these when doing void turnover's of their stock.

Policy D6 Optimising housing density

The previously used density matrix should be reinstated and strengthened from guidance to mandatory compliance. Density is promoted where there is good PTAL levels, However PTAL

does not take into account the reality of increasing numbers of people cramming onto often already bursting at the seams public transport. Regular monitoring of overcrowding on public transport networks is needed to inform this policy.

D B 3 “Where there is currently insufficient capacity of existing infrastructure to support proposed densities (including the impact of cumulative development), boroughs should work with applicants and infrastructure providers to ensure that sufficient capacity will exist at the appropriate time. This may mean, in exceptional circumstances, that development is contingent on the provision of the necessary infrastructure and public transport services and that the development is phased accordingly”.- Exceptional circumstances should be deleted.

Policy D7 Public realm

A ‘Social Infrastructure Accessibility Level’ matrix should be developed and adopted in the London Plan, setting out what services and amenities should be within (a) a walking distance from home, (b) a short bus or cycle ride from home, and (c) a train, tram or tube journey from home. Community and social infrastructure should be protected, gaps in existing provision should be addressed and sufficient should be provided in new developments (including financially accessible community spaces) to meet the additional need. Where existing uses are no longer appropriate, community organisations should be prioritised as potential new occupants.

New developments should not be able to take over or prevent free public passage/ right of way in adjacent proximity.

Policy 3.7.1 needs to be included in the shaded box to clarify the definition of publically accessible open space between buildings whether publically or privately owned, including the Thames and London’s waterways

Community Spaces must be a high priority in the London Plan. There should be sufficient infrastructure associated with every housing development, doctor’s surgeries, schools, children’s & youth facilities parks and green space to facilitate socialising, networking and community building.

Policy D10 Safety, security and resilience to emergency

This Policy would be enhanced by the maintenance of existing/or provision of new community centres with budgetary allocation from relevant CIL/s106 agreements

Policy D11 Fire safety

Post Grenfell, it is clearly imperative that clear lines of accountability and transparency are publically available and all relevant recommendations of the London Fire Brigade are

adhered including the provision of sprinklers or suitable equivalent in high rise public and residential buildings. The LFB should be the final arbiter of fire safety quality.

Policy D13 Noise

This Policy has no explanation for failure of consideration of aircraft noise exposure contours which is a major issue across large swathes of London, not just in the proximity of Heathrow & City airports. This problem will be exacerbated should there be another runway at Heathrow.

CHAPTER 4 HOUSING

Policy H1 Increasing housing supply

- This policy fails to address high levels of overcrowding and the need to deliver mixed and balanced (including low income) communities and lifetime neighbourhoods. Having a single target for all types of homes ignores the need for low income affordable housing
- The evidence of need for social-rented homes in London is enormous. The SHMA identifies this at 47%, but taking 25 years to meet the backlog of need. If the very high levels of backlog of need for social rented homes (at 163,000) was to be met over a 10-year period this would require 62% or more of homes delivered to be social rented. This policy should
 - provide targets for the different tenures of homes required over a 10-year period setting out need as identified in the SHMA along with an overall total;
 - require a cap on delivery of homes above targets, except in the case of social rented homes, where there is such a high backlog of need.

Policy H2 Small sites

Small sites will not include social housing and hence it is imperative that the developers' S106 contributions are collected in every borough and that this is a specific condition enforced and monitored by GLA.

Policy H7 – Affordable housing tenure

It is extremely disappointing that Orwellian language is still being used to describe affordable housing. The current average rent (2nd April 2018- 31st March 2019) of a 2 bed council flat in LB Lambeth is £105.87. In the Mayor's "affordable rent products" the cheapest of the three tiers (London Affordable Rent) for the same size is £152.73, whilst a bedsit/1 bed is £144.26. The other 2 tiers cater to households with incomes of £60k and £90K respectively. These "products" will simply not be affordable to minimum wage

households and will be contrary to the explicit aim in the London Plan for community cohesion and social integration.

There should be monitoring in each rental category of gains (and losses) of dwellings to ensure that agreed rental levels and tenure mixes are sustained and monitoring compliance with internal space standards and external space standards.

Chapter 5 Social Infrastructure

The Policies in this chapter do not give space to any community led activity. There must be a reinstatement of current London Plan Policy 7.1 Lifetime Neighbourhoods.

Whilst Policy S1 recognises the need for the protection of social infrastructure, it does not apply the principles of GG1 nor evidence and base policy on the escalating loss of social infrastructure, particularly community space.

Chapter 11 Funding the new Plan

The London Plan Viability Study (14.2.1) states that the draft London Plan affordable housing policy for residential development underpins the residential viability testing. This is of grave concern and essentially means that tenants are asymmetrically subsidising the implementation. The draft Plan sets out a threshold of 35% for schemes to follow a Fast Track Route where they meet other policy requirements to the satisfaction of the local authority but doesn't include any method for clawback of windfall profits.

The London Plan will not achieve its aims to meet community needs, or include communities in neighbourhood planning decision-making without clear public scrutiny, safeguards and guidance on the role and behaviour of developers and planning authorities as they negotiate planning gain obligations in the development process.

Clearly funding is an issue which may prevent the full implementation without significant changes to access revenue. Relying on revenue from unaffordable rent products is unsustainable, assuming low income households are the intended customer base.

Chapter 12 Monitoring

The implementation London Plan policies clearly need to be effectively monitored. As there are just 12 Key Performance Indicators (KPIs), down from 24 KPIs the current London Plan; the justification this reduction should be open to debate.