

Comments: Draft London Plan

Dear Consultation Team,

I am writing to respond to the draft London Plan consultation.

To my mind the Plan is an admission of the failure of developer-led schemes to provide housing for Londoners in the inner boroughs. But to try and solve London's housing problems by doing more of the same: that is more developer-led schemes, on an industrial scale seems reckless. The draft Plan still seems to give carte blanche to developers to keep building swathes of unaffordable poor quality flats, and demolishing perfectly sound affordable homes as part of the process. People are being driven out and this will only accelerate the injustices. Part of the problem is that Savills have been advising the Government and the Mayor. Nobody seems to be listening to ordinary Londoners.

I am pleased that the draft recognises the importance of green spaces but policies need to be stronger to give them adequate protection, in particular:

- Protecting the Green Belt requires stronger enforcement. It should not be possible to 'swap' designated Metropolitan Open Land.
- Private and public gardens should be protected alongside other local green and open spaces – these form a major part of the city's wildlife corridors.
- Policies and funding are needed to improve the quality of green space by reducing noise, light and air pollution, increasing biodiversity, and by giving stronger protection to mature trees and hedgerows.
- Informal and formal outdoor sports facilities, including for ball sports, should be protected and enhanced.
- A stricter approach is needed to reduce reliance on the private car, including reduced parking provision in new developments and promotion of more sustainable transport modes.
- Excessive housing densities in new development should be resisted to protect the local character of London's neighbourhoods. Communities and Councils must be allowed to determine development but the draft plan removes almost all local say.
- Concentration on development on small sites within 800m of any town boundary or potential CrossRail2 station, fails to recognise the importance of gardens and especially their role as the last real wildlife corridors in London

- Increasead housing proposed is not linked to transport or infrastructure. This link must be restored and density linked back to PTAL. Bring back the density matrix.
- Concentration on development on small sites within 800m of any town boundary or potential CrossRail2 station, fails to recognise the importance of gardens and especially their role as the last real wildlife corridors in London
- Estate regeneration via demolition should not be assumed, this draft plan appears to forget refurbishment should be the norm and existing social housing should be retained.
- Housing should not be developed on the scale proposed without infrastructure alongside. This is the greatest flaw in the plan.

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The following provides some detail on how draft policies can be amended and improved to deliver these objectives:

2 Spatial Development Patterns (SD policies) 25/43

SD1 Opportunity Areas (OAs)

Development will be concentrated in Opportunity Areas, defined as having capacity for at least 5,000 new jobs and/or 2,500 new homes.

The 48 OAs, include 9 new ones (some of which are re-classified existing Intensification Areas). New Opportunity Areas are proposed at Clapham Junction, New Southgate, Poplar Riverside, Romford, Hayes, Sutton, Great West Corridor, Kingston, Wimbledon/ Colliers Wood/ South Wimbledon and Wood Green/ Haringey/ Heartlands.

Features of Opportunity Areas include:

- Can define their own character and density
- Maximize the delivery of affordable housing
- Contribute to regeneration objectives by tackling spatial inequalities and environmental, economic and social barriers that affect the lives of people in the area.

Unlike the current London Plan, there is no longer an OA annex. Consequently, there is relatively little information beyond the handed down development targets of homes and jobs. This includes the new OAs which have appeared with no public pre-discussion. People have found themselves inside OAs - there is no

democratic discussion; no clear idea of what they entail for communities. There is desperate need for communities to have a say.

3 Design (D policies) 97/115

Chapter 4 Housing

It is a widely held view that London is being rapidly transformed to meet the needs of elites in the 'global city' framework and doing so at the expense of the diversity and community which we —and seemingly the Mayor in his "Good Growth" approach in Chapter 1 of the draft Plan— value so much and at the expense of low- and moderate-income Londoners and with costs to the real economy. Comments on the housing policies in the draft new London Plan are made in the spirit of wanting to re-balance these power relationships in pursuit of Good Growth

The GLA's analysis of what is wrong is a mistaken interpretation of the evidence. It is not an acceptable analysis and that is why so many of the proposals are inadequate or dangerous. The essence of the GLA position is that "The origins of London's housing shortage can be traced to a failure over decades to provide the homes that people working in London's growing economy require." (draft Housing Strategy §2.2) and this way of seeing the crisis leads to the Mayor's obsession with getting as much housing built as possible, raising densities and prioritising this as being much more important than what kind of housing is built, at what prices and for whom.

This interpretation down-plays the shrinkage of the social housing stock and the massive expansion of credit to drive up prices, the dramatic growth of income and wealth inequality, the surges of local and global speculative investment and falling real wages for much of the population. All these things have contributed to the London housing crisis and the impoverishment of so many Londoners. Policies to eliminate or manage these forces are essential because more and more of us are exposed to the market to determine what housing we can get (if any) and we confront it on increasingly unequal terms. Solving the problem through building more would take many many decades to bring market rents and prices down (even if developers continued to build homes while prices fell, which is hard to believe), and so much of what gets built is snapped up by the wealthy so the benefits for low- and middle-income Londoners are minimal **or adverse**.

Policy H1 Increasing housing supply and its associated text is a clear statement of the GLA mis-interpretation of the evidence. Its emphasis is entirely on maximising total supply of dwellings. Left until later are questions of stemming losses of the dwindling stocks of social-rented and lower rent homes, of the affordability of what gets built and how the needs of London's diverse communities will be met are left until later or omitted, as also is the treatment of London's severe backlog of unmet need for social and low-rent homes.

We support the view of the Highbury expert group on Housing Delivery in its response (draft)

"We consider that the Strategic Housing Market Assessment [SHMA] has underestimated the annual housing requirement for the 10-year period – the estimate of 66,000 homes a year. This is mainly because the assumption of the timescale to meet the social housing backlog has been amended from the 10 year assumption in the 2008 Plan (and the 20-year assumption in the 2015 Plan) to an assumption that the backlog will only be met over 25 years. As the backlog is primarily in relation to the unmet need for low cost rented homes, this new methodology also depresses the proportion of the 10-year requirement which is for low cost rented housing."

And

"...that the estimate derived from the Strategic Land Availability Assessment (SHLAA) that London has a capacity for 65,000 new homes a year for the 10-year plan period is based on assumptions for increased development densities which are higher than those consistent with pre-existing plan policy on sustainable residential quality and will not provide for the range of building types and bedroom size mixes needed to meet the housing requirements assessed in the SHMA. Our primary concern is that development at the assumed densities will not provide sufficient family size homes."

In one sense London's failure to meet its entire needs within its boundary does not matter. The Mayor needs to pretend that this is possible to satisfy the requirements of the NPPF. But London's housing pressures have been spilling out to regions near and far for decades and will undoubtedly continue to do so, further propelled by Crossrail 1 and (if it is built) Crossrail 2.

But it does matter for two reasons: (i) the cost and environmental impact of all that extra travel is **bad growth** by any standard, and borne by people in all income groups, and (ii) the massive pressure exerted by the targets are a grave threat to good growth in London in the ways outlined above.

Accordingly much of this Policy is misguided. It is aimed almost entirely at boroughs and should be recast to encourage boroughs to explore local and sub-regional needs in consultation with their diverse communities, and to secure target levels of social and low-rent homes including an appropriate range of sizes and adopt policies which help to dampen speculative pressure on land prices. See our comments on density (Policy D6) and Affordability (H5-7). We shall be glad to propose detailed changes.

The Mayor should certainly be leading London in calling for a great expansion of publicly-funded housing supply including greater funding for community-led schemes.

We welcome the proposal to develop housing above single-storey retail parks and above car parks.

H2 Small sites

Boroughs are encouraged to support development on small sites, with presumption in favour of the development, and are given a target for small sites of about one third of their overall housing target.

So this is a significant change, and yet the small sites will only deliver market housing; affordable housing “should only be required through off-site contributions” (H2 H) and boroughs “should be capable of securing cash in lieu” (4.2.12). They could contribute social rented housing elsewhere, but this is much harder to monitor and will inevitably be low in number.

A further concern is the existing use of this land, and the amount of green and social infrastructure that is being lost.

More attractive is small sites capacity for community led housing, including self build, housing co-ops, co-housing and community land trusts. To realise this potential, the policy for small sites must include specific initiatives such as maintaining a register of available land, a register of interest that is fully accessible to community builders, neighbourhood forums and other community interests, and access to cheap loans. Targets should be set for community led housing.

H5 Delivering affordable housing

The key problem underlying the affordability crisis affecting Londoners is the price of land and the Mayor's priority should be to do all he can to slow land price (and that means house price) escalation. In our chapter on [Land Reform](#) (draft) for the next Community-led Plan we have proposed the following:

The Mayor should be

- a. Lowering land price expectations by
 - (i) Enforcing upper density limits without flexibility
 - (ii) Enforcing his 35% affordability threshold without flexibility
 - (iii) Specifying the date at which 35% will become 50%
 - (iv) Making his definitions of "affordable" housing much more affordable, relating them to local incomes, not local market rents
 - (v) Applying his requirement of no net loss of social housing equally across all renewal schemes over which he has any planning or financial leverage
 - (vi) Require that TfL and other Mayoral-family lands that are disposed of for housing development are used substantially for social housing or other social purposes

These proposals are reflected in the following:

H5 A starts by setting the 50% target proportion of 'affordable' homes in new schemes (in effect a target for sub-market housing at a range of 'affordability' levels). However this is not based on the evidence of the SHMA, which assesses the requirement over the 10-year period at 65% of the total requirement of 66,000 homes a year. As stated above, we consider that both these figures are underestimates. Government planning guidance as in the National Planning Policy Framework and subsequent detailed planning guidance, requires each Planning Authority to meet the full housing needs within its area. The targets in the plan should therefore be amended to be consistent with the SHMA. This also applies to the targets for different types of sub-market housing and to targets in relation to the

bedroom size mix of new homes. The target for low cost rented housing should be 70% of the 'affordable' housing target, with the target for intermediate housing being 30% of the 'affordable' housing target. A target that at least 30% of new homes should have 3 or more bedrooms should also be set.

H5 B says *"Affordable housing should be provided on site in order to deliver communities which are inclusive and mixed by tenure and household income, providing choice to a range of Londoners. Affordable housing must only be provided off-site or as a cash in lieu contribution in exceptional circumstances."*

We propose the deletion of *"...and mixed by tenure and household income..."* because (i) most council estates in London are already quite mixed among long-standing residents, leaseholders and private tenants, (ii) this 'social mix' argument has long been used as a pretext to uproot what are perceived as working class communities and insert richer people, but rarely to insert working class communities into rich areas and (iii) we find it condescending and offensive when the argument is made that poor people need richer people to provide leadership or aspiration.

Policy H6 Threshold approach to applications

We support the basic concept of the threshold as an incentive on developers to bring forward more affordable homes.

The 35% threshold should be raised now to 50% and amplified to include the requirement that 70% of that 'affordable' housing must be low cost rental.

A second-best alternative would be for the Mayor to fix in the Plan a firm date (perhaps 2020) when the threshold would move to 50%, with a further increase possible thereafter. This would both help to dampen land speculation and encourage applicants to develop sooner rather than later.

KPI section needs addition (noted)

H10 Estate regeneration

A key planning objective should be to retain the existing stock of affordable/ social rented housing and where there is estate regeneration this must result in a net increase of social rented housing, not simply “no net loss”.

There is no recognition in this policy that the “regeneration” of London’s council housing estates has been an approach that has failed thousands of Londoners, depriving them of their homes and replacing their homes with houses well beyond their means. Unless regeneration is community led, with ownership and control over the process, the term is without meaning as what is happening is merely development.

H12 Housing mix

The presumption in this policy that there will be less family housing in central and urban locations, and therefore lower levels of social rented homes here, will only increase London’s spatial inequality. Much needed is targets for reducing overcrowded homes.

H13 Build to Rent

The introduction of discount market rent further confuses and dilutes the need for genuine social rented homes. No evidence is presented about how large scale private rented developments meet housing need. Of further concern is that build to rent might be the target of vulture investments when blocks change hands. The role of the Mayor in monitoring and scrutinising build to rent needs to be clear.

Standards of good property management, and by extension licensing schemes, should be applied to all private rented homes so that all private renters benefit from better conditions.

I am profoundly alarmed by three other features of the SHLAA:

- (i) that it presupposes a great deal (the exact amount is unstated) of “estate regeneration”, a process which the [London Assembly has shown](#) to have reduced the stock of social housing over the last decade. While I welcome the Mayor’s recent commitment in response to consultations

that ballots will be required before certain schemes involving demolition can proceed, I am very doubtful whether much net gain of socially-useful (good) growth in supply can be counted upon in this timescale.

- (ii) The proposals for housing densification on non-designated industrial land, high streets and town centres will cause severe losses of jobs and services in localities across London. Our representations on this issue are in relation to Policy E.
- (iii) There is a heavy reliance on small sites. This would tend to produce only or mainly dwellings for the open market and thus not help meet the backlog of need nor the top priority current needs. Only if the London Plan were to impose a strict requirement for social housing contributions from small-site, would this be useful.

Although 'regeneration' isn't defined in the *Plan*, it's pitched as being a force for good that brings lots of benefits. For many Londoners, however, 'regeneration' has become a dirty word, in part because local communities don't have a say in where and how it happens; in part because it benefits corporations and investors. If the Mayor is serious about sustainable and inclusive regeneration, strong community participation is essential in all schemes from the outset. This would go some way in restoring the democratic deficits currently embedded in regeneration policies.

Just Space's submission to the [Assembly Regeneration Committee hearing on Transport and "regeneration" in July 2015](#) highlighted one of the major weaknesses in regeneration policy: without long-term studies tracking the impacts of regeneration schemes, it's impossible to find out whether it's the original residents and businesses who benefit (or not) from changes in an area, or new people who move in as a result of regeneration. Three years on, these studies are still needed. This research gap goes to the very heart of plan-making and the soundness of the London Plan. How can the Mayor propose policies on regeneration without reflecting on or analysing whether or not previous policies have worked?

8 Green Infrastructure and Natural Environment (G policies) 301 / 319

I welcome Policy G2 and particularly the proposal in Policy G2B that 'de-designation' of Green Belt will not be supported. This policy needs to be reinforced for it to be effective. Proposed change: A presumption against the alteration of Green Belt boundaries which reduce its extent should be included in policy G2B so that it reads: 'The extension of the Green Belt will be supported and its de-designation will not. We will enforce a presumption against the loss of Green Belt'.

I welcome recognition that Metropolitan Open Land (MOL) should be protected from inappropriate development but this policy is undermined by Policy G3 C and the provision to allow 'land swaps' because MOL is characterised by its 'permanence'. Proposed changes: Policy G3 C should be deleted along with the sentence in paragraph 8.3.2 "The principle of land swaps could be applied to MOL where the resulting MOL meets at least one of the criteria set out in part D of this policy". Policy G3B should be amended to read: 'The extension of MOL designations should be undertaken

through the Local Plan process, in consultation with the Mayor and adjoining boroughs.’

I am concerned that Policy G4 contains insufficient recognition of the contribution of private gardens to the extent of green space and their critical importance to wildlife corridors. A policy is needed to prevent extensive ‘garden grabbing’. Proposed change: Policy G4 A should be revised to include reference to private gardens to read: ‘Local green and open spaces, including public and private gardens, should be protected’.

I welcome support for the creation of new areas of accessible green and open space. These provisions should be strengthened by requiring measures in Policy G4 to improve the quality of green space.

Proposed change

Policy G4 C – should read “Assessments should identify areas of public green and open space deficiency, including an assessment of deficiency in quality, taking account of Green Flag criteria, noise and air pollution, and using the categorisation set out in Table 8.1 as a benchmark for all the different types required.”

Policy G4 E 1) should include at the end ‘including an assessment of, and where appropriate a plan, to improve the quality of the space’.

The policy on noise should make explicit reference to the need to reduce the impacts of noise on green space, and other relevant policies amended accordingly. Proposed change: Additions should be made to Policy D13 Noise as follows:

Para B: Boroughs [etc] should identify and nominate new Quiet Areas and protect existing Quiet Areas in line with the procedure in Defra’s Noise Action Plan for Agglomerations and ensure local green space is improved in line with Policy G4 (as amended) including by:

taking action to reduce traffic noise around parks which are severely impacted by traffic noise and pollution, using such measures as temporary/weekend street closures and/or permanent re-routing of traffic; or introducing natural or man-made noise barriers.

The provision and improvement of green space requires funding to help deliver the Mayor’s aspirations for ‘good growth’ and increasing London’s green cover and should be addressed in Policy DF1. Proposed change: Policy DF1 D (2) should be amended to read as follows: ‘Recognise the importance of affordable workspace and culture and leisure facilities, including public green and open space, in delivering good growth.’

The ‘Urban Greening Factor’ outlined in Policy G5 does not address the human use of green space and overlooks qualitative considerations and a wealth of knowledge about how people use green spaces and how design can enhance their experience. Proposed change: Policy G5 – a further sub-section should be added as follows: (C) Urban greening required and delivered in new developments will be additional to requirements to provide adequate green and open space as set out in G4. New developments must allow for provision of new green and open space in addition to meeting urban greening requirements.

The approach to biodiversity and access to nature outlined in Policy G6 needs to be strengthened to avoid the loss of valuable habitats and wildlife. Proposed change: Policy G6 – The second sentence in sub-section A of this policy should be deleted, along with the whole of sub-section C. The following sentence should be added at the start of sub-section D ‘All new development should seek to achieve a net gain in biodiversity.’

Mature trees are a vital part of London’s green infrastructure and there should be strict controls over felling them in Policy G7, along with recognition of the importance of established hedgerows. Proposed changes:

The value of hedgerows should be recognised in subsection B 1) of Policy 7 by amending it to ‘protect ‘veteran’ trees, mature hedgerows and ancient woodland,,,’. The first sentence of Policy

G7(C) should be amended so it reads as follows: “Development proposals should ensure that existing trees of quality, mature trees and hedgerows, and trees of value in terms of delivering ecosystem services such as water or air quality management, are retained.

Policy SD1 on Opportunity Areas should require sufficient space for the amenities usually provided by parks, in particular playing fields and courts for open air sport. Proposed change: Policy SD1 B(3) should be amended to read ‘plan for and provide the necessary social and other infrastructure to sustain growth, working with infrastructure providers where necessary, and ensuring open and green space is planned to accommodate informal and formal outdoor sports.

A decline in the quality of use of sports facilities is often used as an excuse for allowing development of public open spaces which needs to be addressed in policy S5. Proposed change: S5 B(4) This should be amended to read: “ensure that there is no net loss of facilities. If there is evidence that ongoing or future demand for sports means facilities are under-used measures should be taken to ensure demand is promoted through a local sports strategy or to repurpose the space for an outdoor sport for which there is demand.”

The plan seeks to further restrict car parking in new development and to reframe the link to PTAL. Allowing excessive car parking in Policy T4 is inconsistent with the main transport policies which seek to reduce car trips. Proposed changes:

The following amendments should be made to Policy T4(C) – ‘Where appropriate’ should be deleted and Policy T4(D) should be changed to read “..planning permission may will be contingent on the provision of necessary public transport and active travel infrastructure.”

Table 10.3 - The bottom four rows should be amended so that the maximum parking provision in a development in any area (whatever the PTAL) is 0.3 spaces per unit.

Paragraph 10.4.4 – the word ‘Ideally’ should be deleted and the sentence reworded as follows: “Ideally New development of all sizes, but in particular that which will give rise to significant numbers of new trips, should be located in places well-connected with public transport...”

Policy T6 H: should be amended to read “Boroughs wishing to adopt borough-wide or other area-based car-free policies will be supported. [Delete the outer London caveat sentences.] Minimum standards are not appropriate for residential or non-residential land uses in any part of London.”

I welcome the overarching policy GG2 concerning making the best use of land. This should be strengthened by reference in policy H1 to making use of excessive or redundant road space.

Proposed change: Policy H1 B2d) should be amended to include reference to excessive or redundant road space and other car-related infrastructure so that it reads ‘the redevelopment of surplus utilities and public sector owned sites, including excessive or redundant road space.’

I broadly welcome policies D1 to D6 in the draft London Plan which seek to improve the design and land use efficiency of new housing. We believe policy D6 concerning the optimisation of housing density needs to be amended to avoid a lack of associated public infrastructure, and excessive housing densities and ‘town cramming’.. Proposed changes: The phrase ‘in exceptional circumstances’ should be deleted from the last sentence in Policy D6B 3) so that it reads ‘This may mean that development is contingent on the provision of necessary infrastructure and public transport services...’. The density levels specified in Policy D6C should be amended to 80, 170 and 260 units per hectare respectively so that it reads: ‘ 1) 80 units per hectare in areas of PTAL 0-1; or 2) 170 units per hectare in areas of PTAL 2 to 3; or 3) 260 units per hectare in areas of PTAL 4 to 6’.

5 Social Infrastructure (S policies) 201 / 219

The protection of social infrastructure is a critical concern for London's communities and included within this are a wide range of community spaces which are the fabric of London's diversity.

Whilst Policy S1 recognises this important role, it does not evidence and base policy on the escalating loss of social infrastructure, particularly community space, in recent years as a result of development pressure.

Policy S1 does not apply the principles of Policy GG1 Building Strong and Sustainable Communities which aim to ensure growth reduces inequalities and improves the quality of life for all Londoners by

- providing amenities that strengthen communities,
- increasing active participation
- planning for places where amenities can flourish and that provide important opportunities for social interaction
- taking advantage of the knowledge and experience of local people

Just Space produced and shared with the Mayor a manifesto for community spaces, and it is disappointing that these proposals have not been taken into account. These include:

- Recognise the irreplaceability and uniqueness of many community spaces and look after them for future generations as part of a continuing legacy
- Access to and the value of community spaces is not based on business plans and income generation but on the social value of the community space and its contribution to health and well being, inclusion, integration, empowerment and poverty reduction
- Social infrastructure and community spaces are essential to the achievement of lifetime neighbourhoods in which services and amenities are accessible and affordable to everyone, now and for future generations, and provide space for social co-operation and mutual aid,
- Valuing and resourcing community-centred knowledge and creativity for the contribution this can make to policy discussions and a whole system approach to community engagement across the GLA.
- The tool of Social Impact Assessment to gather evidence of community assets, including social infrastructure, with a methodology that ensures local community networks are fully involved through a collaborative relationship with the Boroughs and GLA. See Just Space Towards a Community Led Plan for London, chapter on Social Impact Assessments.

The principles above need to be inserted in Policy S1 A – F.

In **Policy S1 B** social infrastructure needs are only addressed via traditional Borough planning mechanisms and the community scale is secondary or non-existent.

7 Heritage and Culture (HC policies) 267 / 285

The draft Plan gives insufficient consideration to the protection and enhancement of London's diverse local character. Policies D1 and HC1 need to be amended to ensure that greater attention is given to the character map of London, and community or neighbourhood plans, in planning and designing new development. Proposed changes: The first sentence of Policy D1 'London's form and characteristics' should be amended to make specific reference to neighbourhood and community plans so that it reads 'Development Plans, area-based strategies, neighbourhood and community plans. and development proposals should address the following:' The phrase 'reflect and enhance local character and distinctiveness' should be added to the list after 1) in Policy D1A.

The first sentence of Policy HC1 'Heritage conservation and growth' should be revised so that it reads: 'Boroughs should, in consultation with Historic England, other relevant statutory organisations and local community and neighbourhood planning groups, develop evidence that demonstrates a clear understanding of London's historic environment, local character and distinctiveness.'

9 Sustainable Infrastructure (SI policies) 319/337

10 Transport (T policies) 401 [pages 375-400 don't exist?] / 393

11 Funding the London Plan (F policies) 439 / 431

This is far too reliant on private enterprise, which will continue the social cleansing of London. The targets are meaningless without defining affordable. The key targets need to be preservation and augmentation of existing social housing.

12 Monitoring 457 / 449

Societal trends and issues: a qualitative indicator measuring such senses as fulfilment, life satisfaction, worthwhileness, trust, well-being & happiness. This can avail of the Justmap survey potential of London's community groups at an appropriate time before each Annual Monitoring Report.

Fair and inclusive city: with a particular focus on equalities – gender and ethnicity. Race on the Agenda and disability organisations will assist on this.

Civil society: measuring its development across a series of aspects and levels of participation - not just volunteering levels - including the range of voices being heard and the degree of achieving impact, levels of trust in authorities.

Health: at least, add in healthy life expectancy, together with groups with protected characteristics.

Economic: in-work poverty, household income after housing costs, gender and ethnicity disparities, diversity and range of offer of businesses, good jobs that are secure paying at least the London Living Wage.

Workspace: not just numbers of jobs, but quality and local accessibility; protection/loss of existing employment land and jobs, with targets that give prominence to existing and local jobs, job types and sectors.

Housing: meeting the local and diverse needs of people, using such measures as the proportion of local waiting lists able to afford new homes locally on offer, community-led housing, specialist priorities, linking to GLA housing guidance. **Most importantly, i) social housing requires careful monitoring to ensure no more is lost and ii) monitoring of regeneration impacts on existing communities, economic, health and displacement.**

Integrated Impact Assessment (IIA) of the draft London Plan
Desperately needed!

Thank you,

Claire Mellish