

N Palit

Sadiq Khan (Mayor of London)

By Email

New London Plan
GLA City Hall
London Plan Team
London SE1 2AA

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Dear Sadiq Khan,

I am a Londoner, I live and work in London, and I grew up in London. I am also a chartered town planner working in the development industry. Therefore I have reflected on my experience from my professional experience as well and incorporated some comments stemming from this. However this response is a strictly personal response, and should only be considered in this way. This response in no way reflects the views of any organisation I am employed by or affiliated with. I am grateful for the opportunity to be able to share my thoughts and contribute to the strategic planning policy for our city. I hope my insights are helpful to informing the London Plan.

Below are a broad collection of my thoughts on different aspects of the draft plan. I welcome the increased emphasis on the impacts of development on the environment, and on addressing issues such as air quality and sustainable drainage. As pressure on London's land and resources increases, particularly for the delivery of more housing, for me it is thus increasingly important to protect valuable community assets (both built and open space) from the pressure for housing. I am also of the view that the Mayor should take proactive steps to negotiate so that public benefits that are made possible through development secure these for the long term, not just in terms of ensuring housing remains affordable in perpetuity, but also that the maintenance of public routes, and open green spaces have adequate measures in place to ensure they can realistically be financially sustainable and maintained in the long-term.

My comments on the plan are set out in turn by chapter, and policy where appropriate.

Chapter 1 – Good Growth Policies

Policy GG1A – suggest wording amended to 'generate and retain' a wide range of opportunities ... to reflect the pressure on the release of employment land and the implications this has for the loss of certain types of jobs.

Policy GG1D – it is not just town centres that play an important role in civic life. Though the value of public space is recognised in Policy GG1C London's open

spaces also play an important role in civic life, and the plan should recognise this. Various activities take place in its open spaces, be this 'ParkFit' offering free group exercise classes outdoor, or 'Parkrun' offering free 5 km runs every Saturday morning, or voluntary 'friends of' type groups cleaning up green spaces and fostering social interaction. In addition, numerous out-of-town locations can play a very important role in local civic life primarily because rents are cheaper here, and activities that play a valuable role in community are often not profit driven and cannot compete with other uses which are. Some examples in my own locality include the St. Margaret's House complex on Old Ford Road, which includes a café, the "Create Place" (arts space, offering workshops, classes and studio hire to the community) and disused chapel in the backland, where various activities including a community choir are held, or Bullards Place which offers arts and life drawing sessions. All of these play a valuable community function, and therefore the wording and definition of policies should be considered carefully, to ensure that it is not just designated town centres that are protected with respect to their contribution to civic life.

Policy GG1F – integration also needs to be considered beyond the point of granting planning permission. For example, there is an existing aspiration that all tenures should be able to access shared facilities within buildings, such as communal amenity space. This relies on ensuring management post completion respects this. Aspects such as this should be secured through legal agreements (i.e. S106) to ensure there is a recourse if non-compliance with these aspects is found after development.

Policy GG3D only requires those involved in development to 'assess' the potential impacts of development on health and well-being, however it is not clear how much, if any weight should be given to these assessments. Health Impact Assessments are already in place in some boroughs, but often little, if any weight is given to these, and the Mayor should consider how these could be more deeply embedded into the development process. For example, it could become a validation requirement for any GLA referable applications, to emphasise to developers its importance right from the outset, in a similar manner to how high-level in principle information on sustainability and other key issues are currently requested from the outset.

In order to enable improved access to open space to be planned for adequately, boroughs should be required to keep their open space evidence up-to-date. Consideration could be given to capitalising on technology and open data to enable this to be kept up to date in the interim between formal assessments which are undertaken by external consultants.

Paragraph 1.4.5 states "Small sites in a range of locations can be developed more quickly, and enable smaller builders to enter the market." This is not always true. Small sites can often have complex issues to be resolved, non-planning consents, such as utilities and highways consents required can take just as long to obtain, the planning negotiation on small sites for 'minor' developments can often take just as

long as larger schemes of hundreds of homes, which avoid many of the intricate challenges faced by small sites as they can begin to create their own character at the centre of sites.

Paragraph 1.4.6 suggests boroughs should use all of the tools at their disposal to encourage homes with consent to be granted; these tools should be clearly set out to help encourage boroughs to employ them.

Chapter 2 – Spatial Development Patterns

For delivering growth within outer London boroughs consideration should be given to additional alternative options to simply focusing development in and around stations. For many people living in Outer London life does not necessarily revolve around commuting into central London. A larger proportion of families live within outer London, and for these households, day-to-day life can often revolve around children, and dropping them to nursery or school. Much of outer London traffic is generated from 'school runs'. Consideration could be given to encouraging higher density developments around schools as well as transport nodes and in town centres, not only to reduce house prices around schools, but also to recognise that for many Londoners, including working parents, and children schools can be the central focal point of their lives. This would help encourage sustainable travel patterns and reduce travel times between home and school and onward travel for parents who then go to work.

In policy DD1Ac it suggests the Mayor will support implementation and preparation of planning frameworks that 'support regeneration'. Regeneration should be clearly defined in a transparent manner that written in a way that is accessible to the general public beyond those within the development sector. It should be defined within the body of the plan, as well as the glossary.

In draft policy SD1Ab9 the mayor suggests boroughs should ensure planning frameworks are subject to public and stakeholder consultation. The Mayor should make explicit that this should happen from the earliest stages, and could relate this to figure 2.2.

To genuinely give primacy and emphasis to the importance of active travel the spatial strategy outlined in Chapter 2 should also outline the planned routes for significant cycling infrastructure, alongside planned public transport infrastructure improvements or extensions. For example, it could map out the six new segregated cycle routes planned announced on 30.01.2018, as well as the boroughs referred to later in the draft Plan (Figure 10.2), which the Mayor suggests will be the focus of improved cycling infrastructure and facilities, to be brought forward through SPDs. In addition, the strategic green and blue corridors across the borough that encourage active travel between different parts of the city, should also be highlighted within this chapter.

The Mayor should give consideration to taking a more proactive approach to supporting local communities to engage in the plan-making framework from the

early stages. For example, at the early stages of plan-making boroughs should be encouraged to ask local residents to put forward facilities and amenities in their area which they believe should be considered for designation as 'Assets of Community Value'. This will help to ensure that in regeneration areas particular spaces which are of intrinsic community value can be retained or re-provided in some form.

In relation to the intensification of town centre commercial space, whilst beyond the ability and remit of the draft plan, consideration should be given to the vast amounts of floorspace taken up by residential lettings agencies in central locations, and whilst from a design point of view they may offer 'active frontages' these types of spaces offer little real activity or value to the wider surrounding town centre areas they are located within. Whilst it is acknowledged that this may not necessarily be considered to be a strategic concern, consideration could be given to if and how less efficient uses of space such as these can be discouraged or encouraged to offer greater employment densities.

Chapter 3 – Design

Draft Policy D7 of public realm refers to ensuring that design adequately considers how the public realm can create barriers to movement. It is appreciated that this policy is included within the design chapter, however further consideration should be given to also encapsulating guidance around the *management of public space within private ownership* (commonly referred to as 'PoPs'). The intention of producing a Public London Charter to address this issue is strongly supported. The details of the proposed public consultation of this proposed Charter should be publicised prior to the publication of the next iteration of the Draft London Plan. Whilst it is acknowledged that delivery and maintenance of public space through PoPs may offer some benefits, i.e. coherent management of the entire public realm and diverse space and events programming, careful consideration should be given to the detail of how PoPs are managed. In developments which bring forward public space and routes through sites to deliver greater connectivity and permeability the Mayor should ensure that the design of schemes and subsequent legal obligations allow cyclists to ride through routes through sites, as well as creating pedestrian routes. I would strongly urge the Mayor to take this into consideration, as to not do so would directly go against the intention to create a more liveable city with a more healthy active and connected streetscape.

The aspiration of increased provision of free drinking fountains set out in paragraph 3.7.11, to reduce single-use plastic waste is strongly supported. The Mayor should consider how these will be secured and maintained in the longer term. Boroughs have limited resources, which are focused on high priority areas such as housing provision and job growth. The Mayor should give consideration to requiring boroughs to identify potential locations for planned regeneration areas for which Area Action Plans or other forms of planning framework are to be produced.

The agent of change principle in draft Policy D12 suggests that noise generating measures such as schools proposed near to residential development should put in

place mitigation measures. Careful consideration should be given to the implications of this. As part of the plan's health agenda it is important to ensure that schools can provide open spaces for children. Policy D12E as it stands would encourage enclosed play areas, to enable sound insulation to be put in place. This would reduce many of the mental health effects of being connected to outdoor space.

In policy H17 consideration should be given to embedding expected minimum design criteria that should be applied to the provision of student accommodation. Case law sets dangerous precedents for the quality of accommodation that has historically been considered to be acceptable (for example the permission granted by a planning inspector at 465 Caledonian Road). This goes against the principles of the plan which aspires to achieving an equal and good quality environment for all. It is important to recognise the value of students as citizens of this city. There is significant evidence to show that mental health issues can be a particular concern in student populations and thus a commitment to quality, including good ventilation and daylight and sunlight levels within accommodations should be a requirement.

Chapter 5 – Social Infrastructure

The Draft London Plan (Policy S1G) should put in place strict definitions of what 'redundant' social infrastructure is considered to be. Strong requirements should be put in place by the GLA setting out clear requirements for what is expected of developers to justify the loss of social infrastructure space. Within the development industry there are anecdotally malpractices around adequate 'marketing' of such premises, where those employed to do so would benefit less financially from successfully marketing such uses for social infrastructure use, rather than if promoting for housing development. The Mayor should consider whether the London Plan can put further provisions in place to protect such spaces in the long term. In particular, I would suggest that the Mayor could take a firmer approach to the protection of social infrastructure and cultural assets by requiring authoritative marketing evidence similar to the requirements set out for the protection of pubs within paragraph 7.7.7.

Policy S4 – there is an increasing acceptance that developments beneath a certain size, do not need to provide on-site play facilities for those above 5 years of age. In the context of a London Plan which appears to rely heavily on the delivery of housing through small sites, the Mayor should give more detailed considerations to how this policy will impact on the future of play provision, and consider whether stronger guidance is needed on the expectations of on-site play provision within the future plan, or related updated SPGs. This is of particular concern as the voices of children are typically underrepresented within consultation responses, but as a potentially vulnerable group the Plan should seek to ensure a positive quality of life for them.

It is welcomed that the Mayor encourages boroughs to identify how well the cultural offers serve different groups of people within paragraph 7.5.4, I would urge the Mayor to consider including this text within the body of the accompanying policy to ensure that due weight is given to taking a fair and equal approach to the assessment of cultural value.

Chapter 8 – Green Infrastructure and Natural Environment

The Mayor should give consideration to including within the supplementary text of draft Policies G1 and G2 that developments that could be considered to affect Metropolitan Land and Public Open spaces includes the expansion of airports. Policy G5 places a significant emphasis on the provision of urban green cover, including street trees, green roofs, green walls and rain gardens. This aspiration is supported, however the Mayor should give serious consideration to how he envisages elements such as green roofs and green walls will be maintained in the long term. The Mayor should give consideration to how their ongoing maintenance will be secured through planning obligations or otherwise. This should be incorporated into the plan to give developers certainty of the expectations around this so allowance is made from an early stage for costing of urban green elements. The Mayor should also give consideration to whether this is an element that boroughs should monitor through AMRs or similar, whilst also taking into consideration limited Council resources. The Mayor could consider whether there are opportunities for data such as this to be captured and shared through new technologies, in line with the Mayor's wide 'open data' aspirations.

In order to secure the longevity of good access to Metropolitan Open Land across the capital the Mayor should give consideration to putting in place policy provisions that encourage boroughs to think laterally and creatively about the regeneration of public open spaces how these spaces can be used most efficiently. An example of one such creative approach to the delivery of open space that makes efficient use of land is Rectory Farm in Hounslow. The Mayor should give consideration to actively encouraging boroughs to consider how to deliver open spaces that make efficient use of land, particularly in regeneration areas. To truly embed the aspiration of London being a 'National City Park' the Mayor should give consideration to setting out targets for each borough for the creation of public open green space over the Plan period, and requiring this to be planned for within borough Local Plans.

In policy S17A5 the Mayor should give consideration to making explicit reference to food waste within the policy, as well as requiring major developments to provide adequate separated storage within dwellings for separated food waste. In particular, the Mayor should introduce mandatory guidance for the storage and collection of food waste from flatted blocks. A recent London Assembly report indicates that Milan's municipal recycling increased dramatically by introducing food waste collections to all properties, including flats. Density has not been a barrier to increasing recycling there by 20 per cent since 2011. 80 per cent of the population in Milan live in high rise buildings. A report to the London Assembly

Environment committee dated February 2015 stated: *“Food waste is a considerable environmental problem. In the UK alone, we create 7 million tonnes of household food and drink waste every year. While around two thirds of this waste was collected by local authorities in 2012, most was in with the ‘residual’ or general waste, which may end up on landfill. Only 11 per cent of the food was captured through separate collections of food waste. Sending food waste to landfill is especially harmful to the environment. The methane and carbon dioxide released by organic waste in landfill sites globally adds an estimated 3.3 billion tonnes of greenhouse gases to the Earth’s atmosphere.”*

In policy S112C the Mayor should give consideration to strengthening the requirement to set back development from the edge of watercourses, particularly in opportunity areas or regeneration areas where there is potential for wider scale public routes to be created along water frontages. An alternative suggested wording could be: “This should include, where possible, making space for water, and aiming for the starting point for scheme design in such locations where there is potential for wider public access to be created along the water frontages should be for development to be set back from the banks of watercourses”

Detailed modelling of surface water run-off at borough-level is often only publically accessible in the form of static pdf maps. Given the strategic importance of improving the water environment and reducing contribution to flood risk, the Mayor should give consideration to encouraging Boroughs and LLFAs to contribute to a centralised London-wide database to make information more easily accessible in line with the Mayors commitment to open data.

Policy S113B1 suggests development should give consideration to provision of rainwater harvesting including blue roofs; the technical feasibility and cost of delivering such solutions should be fully assessed if this is to be included within future revisions of the Plan. In addition, roofs of residential developments are under pressure to function efficiently, with competing demands for use as rooftop amenity space or children’s play space, green and brown roofs, blue roofs, and space for photovoltaic cells, amongst other items (not necessarily of strategic concern, but often needed as functional requirements) such as rooftop plants, or telecommunications equipment. This is particularly relevant to higher density development. The Mayor should give this stronger consideration and outline clearer guidance on his priorities for how roofspace should be used in development proposals. This could be in the form of supplementary planning guidance. For example, development decisions around which of these competing uses can be delivered on a rooftop are often driven by any financial off-set contributions which are required where expectations cannot be met. E.g. if a borough’s financial contribution to offset children’s playspace is cheaper than the financial contribution to offset shared amenity space then the provision of general shared space would take priority over delivering children’s playspace. This can equally be applied to PV. The Mayor could consider whether it is appropriate to provide further guidance to boroughs on this aspect.

I strongly support the Mayor's intention to further encourage cycling as a primary mode of transport to be delivered through policy T5. I strongly support the provision of higher minimum cycle parking standards as set out in Figure 10.2; the Mayor should ensure this extends to fully cover the LLDC and OPDC areas. In addition, given the recent data on the falling levels of Londoners taking public transport, and the speculation this may be down to increase in on-demand services such as Uber, it may be wise for the Mayor to consider the implications of emerging 'dockless bike' solutions such as Ofo bike and Mobike that will compete with TfL's established docked bike sharing and consider whether the policy.

Chapter 10 - Transport

In policy T5 the Mayor makes provision for enabling developers to consider acceptable off-site solutions for cycle parking. For the avoidance of doubt the Mayor should consider adding wording to make explicit this will only be acceptable on small-scale developments, and should not be an acceptable approach for large scale projects where secure cycle parking should be integrated into development blocks and should not detract from positive street scenes through provision of on-street hangars.

In paragraph 10.5.1 the Mayor sets out his intention to work with boroughs to deliver a new London-wide network of strategic cycling routes, to transform the convenience and experience of cycling for all types of trips. It is recognised that the upkeep of many roads falls within the responsibility of boroughs, and not to TfL. Nevertheless, the Mayor should give consideration to how boroughs can be encouraged to secure detailed road design improvements that improve cyclists experience with a focus on safety and road surface quality, (which is often poor due to construction traffic and uneven surfaces around drain covers.) This is particularly important to secure within regeneration and opportunity areas, where large scale coherent road improvements can be planned and delivered. In addition, the Mayor should also give consideration to securing a commitment from developers/contractors who deliver highways improvements to maintain them to an adequate quality over a longer time period (e.g. 5 years following completion). This could be secured in a similar manner to the securing of high quality landscape proposals over the longer term through landscape management plans. This is important not only for improving cyclists experience thus encouraging more people to use this mode of travel, but is also in line with the Mayor's commitment to making a fairer city. Poor road surfaces most greatly affects more vulnerable groups of cyclists such as young people, old people, and those with disabilities. This issue should therefore be considered to be of strategic importance and addressed within the London Plan, rather than being left to the responsibility of individual boroughs.

In Policy T8C which requires the impacts of aviation to be fully acknowledged it must be recognised that the expansion of airports and consolidation of flight paths (though it is recognised the latter alone does not constitute 'development' and therefore falls outside the remit of what planning can control), can have significant

detrimental impacts on nearby **protected designated open spaces**. As an example, in my borough in particular, Tower Hamlets, which is one of the most deprived boroughs, many residents rely on access to the boroughs metropolitan park – Victoria Park- as their main access to an open space. However, the increase of flights and consolidation of flight paths from City Airport gave no regard to the impact on noise within this open space. Therefore, it is particularly important to ensure that any proposed development for airports not only consider the noise impacts of nearby vulnerable uses such as residential properties, but also on open spaces. The Mayor should seek to ensure through legal obligations that nearby open spaces are not unduly affected by sound from overhead aircraft, not only at the point of granting of planning permission, but also that any substantial amendments to flight paths from airport development is reassessed with respect to its environmental impacts. The intention to secure this through Policy T8F is welcomed, however further interrogation should be given to whether this policy can effectively secure this, given that currently changes to airspace are not required to be assessed through the planning process.

I strongly support the Mayor's intention to oppose any further expansion of Heathrow as set out in Policy T8D.

Conclusion

I trust my comments and views will be taken into consideration and look forward to seeing future revisions of the Draft London Plan for comment.

Yours Sincerely,

N Palit