

(SENT BY POST AND EMAIL)

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Date
9 December 2016

Dear colleague

A CITY FOR ALL LONDONERS

Background

1. I am writing on behalf of Ealing Council in response to "A City for all Londoners" published by the Mayor of London on October 24th 2016. This document seeks to outline the capital's top challenges and opportunities across priority policy areas, as well as the changes that City Hall wants to deliver over the next four years. In particular, it outlines how he plans to respond positively to pressures on growth.
2. This document sets out a direction for London, which the Mayor will later expand upon in detailed strategies, including: land use and growth (the London Plan), transport, housing, economic development, the environment, policing and crime, culture and health inequalities. As such it is a "high level" document and is therefore very short on detail. Notwithstanding this, we welcome its publication as it gives a broad indication of the direction of travel by the Mayor.
3. The future publication of these plans and strategies will of course provide more flesh on the bone but in spatial planning terms it suggests the scope of any future review of the London Plan could be quite modest and this in my view may present a missed opportunity.

Growth and Development

4. London is to be developed according to the principles of "good growth." This is clearly a laudable objective. Furthermore the Mayor is committed to: "Taking bold measures to meet as much of the city's growth demands within London as possible." This seems to suggest that London will still be able to meet its objectively assessed housing needs entirely within the GLA boundary and we do not believe that this strategy is either sustainable or deliverable, especially over the medium to longer term.
5. We acknowledge the Mayor's pioneering work on regional planning and the efforts to work collaboratively with the Wider SE of England, in particular, the

commitment to: “Agree joint infrastructure investment corridors (where infrastructure is planned to open up housing and other development) that stretch out beyond London’s borders” – in particular, support for Crossrail 2 by 2033. This offers enormous scope and potential for positive planning and partnership working. It clearly recognises that London’s Housing Market Area does extend beyond the GLA boundary and that the continued growth and prosperity of the capital requires a wider spatial framework. Whilst this work has proceeded at a painfully slow pace the Mayor is to be encouraged to continue this endeavour.

6. Within London the Mayor acknowledges: “There is a need to intensify development across the city” – particularly in opportunity areas and around well-connected transport nodes as locations for significant and much higher-density housing development. Whilst this aspiration is broadly supported the London Plan and its multiple updates have substantially mined out the business-as-usual options for development in London, with most possible Opportunity Areas now identified and most sites within Town Centres in the process of planning or delivery at enhanced densities. Indeed, within this broad framework Ealing continues to take a positive and proactive stance on future growth and development.

7. The ambitions set out in the document will require a willingness to undertake a comprehensive review of the London Plan in order that the complementary aspects of land use can be maximised. The historically exceptional nature of current growth in London also requires a new and integrated approach to delivery of both development and supporting infrastructure that has up to now been conspicuous by its absence.

8. The interrelationship of land use within a large and growing city like London is the absolute key to the delivery of housing, employment, and services at higher densities and in better quality environments. After decades of car-driven separation of urban uses and functions, these are now being forcibly reintegrated by the sheer weight of demand and congestion cost. This mixing of uses is the fundamental strength and attraction of cities in general and London in particular.

9. This results in two fundamental realities for development within London:

- Absolute density will always be a function of transport accessibility. The creation of ‘new density’ will follow new transport capacity.
- The urban environments that live up to their full potential, whether in terms of density or environmental quality, are mixed environments. Reintegrating land use is the most important strategy and delivery tool.

Housing

10. The document acknowledges the fact that: “Experts say we need to identify land in the capital to build 50,000 homes every year between now and 2041.” Clarification is sought as to whether the Mayor is signaling a retreat from the current definitive quantitative housing supply targets in a future London Plan that are set for each London borough. We would point out that historical evidence over the past decade demonstrates that West London has a proud record of meeting and exceeding its overall housing supply targets by almost 30% and that other sub-regions have not

performed as well particularly East London (although we acknowledge that their volumetric targets are far higher).

11. The Mayor has rightly identified a number of barriers to housing delivery and we broadly support his efforts to help mitigate or overcome these obstacles to delivery many of which do require either a change in government policy or some form of public subsidy to enable developments to be kick-started. In particular, the approach to Housing Zones has been hugely successful in Southall in helping to act as a catalyst for development and ensure that schemes can be accelerated and the necessary infrastructure provided to overcome log-jams in the development pipeline.

12. As part of the call for sites for the London SHLAA we have put forward RAF Northolt. Although not in Ealing it immediately borders our borough and we believe offers huge potential for development especially given its proximity to key routes into London by road and underground. The airbase serves no real strategic importance and its closure would help offset additional flights from Heathrow whilst allowing for congestion in the skies to be managed more effectively and fairly. It would also ensure that development at higher levels of density could be achieved in the surrounding area because there would be no need to safeguard approaches to the airbase.

13. On the question of the use of compulsory purchase powers, we contend that they are currently a very poor tool for increasing the volume and speed of housing delivery, being slow, expensive and on the boundaries of LPA skills. The obvious complementary role for the public sector in London is in areas of market failure. In Ealing there have been very clear examples of large and strategically important sites that are difficult to deliver with current tools.

14. Recent site assembly processes at Ealing Cinema and a similar effort now beginning at Southall Gateway have highlighted a CPO process that is wholly unfit for purpose and fraught with risk for LPAs. The legalistic nature of CPOs makes them a poor and costly tool for delivering plans and one for which planning departments are poorly trained and resourced. The great urgency around housing delivery, which has emerged in the planning system over the past decade, seems wholly absent from the legal process.

15. Similarly, three years of joint work at Old Oak and Park Royal show that London's current instrument for site assembly in the form of the MDC is insufficient when it does not attract public monies of the sort spent on the Olympics, and that MDCs will not stretch to delivering smaller and isolated sites.

16. We note also that: "A target of 50% of new housing built across the city being affordable" is set and this approach accords with our own local planning policy. However, we note that the subsequently published draft Mayor's Housing SPG sets a lower threshold of 35% effectively leaving it up to boroughs as to whether they can achieve higher levels of affordability.

Employment

17. Pressure on industrial land in London is almost entirely a product of demand for housing land. As a borough with very substantial housing delivery ambitions

and a significant employment land stock we contend that policy in these two hugely important policy areas has been allowed to develop at very different speeds with employment policy lagging far behind housing in refinement and effectiveness.

18. While housing policy controls the nature and form of residential uses and specifically requires that they achieve optimal densities, no such requirements exist for employment/industrial uses. As a consequence, industrial land in London is unable to meet the requirements of businesses and essential services, and is extremely inefficient in its use of land. This pattern also places increased stress on the strategic transport network and significant financial costs on businesses and their employees by effectively segregating people and their places of work.

19. Current policy, whereby SIL and LSIS has a boundary drawn around it and non-conforming uses are excluded, has nonetheless failed to control supply, with release running at about three times identified capacity. Nor has it succeeded in securing affordable business space for the huge variety of users in London, from shared and managed workspace to the remaining large industrial operations. Industrial land supply and price control is essentially through physical decay, with little impetus to renewal or intensification.

20. Added to this, the vast bulk of London's demand for industrial land is projected to be for logistics space which will take up almost all of the slack from the continuing decline in employment rich industrial uses and this is likely to exacerbate the employment imbalance between inner and outer London. This should be seen as being unsustainable in the long term, necessitating longer commutes and taking more spending power away from major and metropolitan centres.

21. Employment policy is in reality a portmanteau for at least three distinct functions:

- Essential service uses (such as waste);
- Logistics functions; and
- Jobs and affordable business space.

22. Waste and similar strategic functions have enjoyed a strategic lead in policy terms to protect and allocate sites, but it remains to be seen whether identified sites succeed in capturing contracts with the private businesses that undertake these services. This priority for the supply of waste sites should certainly be re-examined as part of finer grained industrial policy.

23. Similarly, the predominant demand for growth in logistics sectors such as home delivery has continued to be accommodated in big shed premises that are land hungry and low in employment density. London needs to fully review emerging logistics needs and ensure that land use strategy is best fitted to its changing requirements, including consideration of the capacity of these uses to serve London from outside its boundaries. Rapid delivery and hub and spoke operations increasingly suggest larger logistics hubs outside London and more and smaller facilities within.

24. Finally, the problem with employment policies that seek to provide affordable space by protecting existing land supply is that they do little to encourage development and efficient use of land. Shared space and incubator units that would deliver high

employment densities are also in great demand among start-ups and growth sectors.

25. In the context of competing land use within a growing city securing sufficient business and employment space is as much a question of delivering a sufficiently high quality of overall built environment as it is identifying a certain hectareage of land. Ealing has identified several locations, particularly within our two Opportunity Areas at Southall and Park Royal where SIL and LSIS designations are both failing to deliver appropriate employment space and conflicting with improvements to the built environment.

26. There is an immense opportunity for new typologies of industrial development characterised by densification and mixed uses. These could play a part within a broader strategy to refine our definitions of industrial need, secure absolutely the space required for logistics and genuine bad neighbour uses, and rationalise and reinforce the boundaries of this space with high quality, employment rich mixed development.

Green Infrastructure

27. Ealing welcomes the Mayor's statements around enhancing green space and, particularly in the context of growth; the Council also shares this priority. The need to ensure that such space is put to best use through its effective and efficient use will be central to achieving this goal.

28. The Council also notes the particular emphasis in the Mayor's vision on protecting Green Belt. Whilst Green Belt is clearly a topical issue the Council is concerned that this particular emphasis might largely be a reaction to the debate rather than being underpinned by a strategy for green space which considers Green Belt proactively as a resource to support the needs of a growing population.

29. We are also concerned that this particular focus on Green Belt, if carried forward in shaping the next London Plan, will detract from other green space designations (notably Metropolitan Open Land and Public Open Space), which should also warrant attention in any review and often comprises space of equal or greater value.

30. Ealing as a borough is somewhat unique in that, whilst it does not sit right on the edge of London, it does contain areas of Green Belt on its western edge. When combined with Metropolitan Open Land, these designations account for 22% of the land area of the borough. Given the extent of coverage the Council has considerable experience of dealing with applications for development affecting such areas. To the extent that the Green Belt and Metropolitan Open Land extents have largely remained intact the policy might be viewed as a success.

31. Frustratingly however such policy designations and their associated policies have been less effective at improving the quality and/or condition of such spaces or the degree to which they are functionally accessible to the public. In certain cases the existing policies have in fact hindered our ability to secure such enhancements. Despite this, competing pressures to utilise this space for recreation and development continue to grow.

32. Both current national and regional policy principally see Green Belt as an urban containment tool, and whilst this role is understood and it might have its place, in the context of growth its purpose(s) must be re-examined.

33. Unlike other policy areas which have had to modernise, Green Belt and Metropolitan Open Land policies have largely remained static and as work has now commenced on preparing a new London Plan now would be an opportune time to review this. This review should go back to first principles and consider the role, success and value of Green Belt policies and specifically its current set of purposes.

34. As a minimum the Council would advocate an expansion of the current set of narrowly defined purposes/aims to include new purposes which also recognise Green Belt as a resource (for example in recreational and landscape terms).

35. Whilst the Council recognises that in setting Green Belt policy the Mayor takes its lead from national policy, and therefore varying or expanding on this will be challenging, the Mayor is nonetheless best placed to lead such a change/debate. Moreover even if current national policy objectives/purposes prevail it is crucial that the extent of Green Belt in London is correct when viewed against the current policy provisions.

36. The current geography of Green Belt in London was largely defined many decades ago, and despite clearly having regional significance as a policy designation through shaping the pattern of London's development relative to its neighbours, the process of drawing up and reviewing boundaries has largely been left to the individual boroughs. The ad hoc and sometimes inconsistent nature by which Green Belt has been defined has given rise to many anomalies in its geography. Rather than forming a continuous band around London which separates London from neighbouring and distinct settlements, sections of it are more akin to a green wedge.

37. Whilst this arrangement clearly has merit in that it helps to bring the countryside into the urban area, it does little to contribute to its current purpose of preventing sprawl. Moreover, such green wedges are sometimes fragmented or weakly linked and essentially form isolated islands surrounded by built areas.

38. Such green parcels it might be argued better reflect the characteristics of Metropolitan Open Land. RPG 3 (1996) in fact acknowledged this situation and at the time advised that local planning authorities might consider reverting Green Belt land to Metropolitan Open Land (MOL). This advice was never carried forward into the London Plan and based on the current geography it does not appear to have been heeded.

39. In light of the above, there clearly is a need for a pan-London review of Green Belt. Whilst the boroughs will need to implement/adopt any such changes, the GLA is best placed to oversee this, with input from the boroughs. The GLA already undertake similar exercises in the case of other strategic employment (SIL) and ecology (SMI) policy designations and so this process can and does work in practice.

40. Whilst the Council recognises the scale of the task and understands the GLA's nervousness to take on such an exercise such a review need not be contentious. One of the weaknesses with Green Belt reviews undertaken to date, and a source of

their critique, is that they frequently fail to put Green Belt first. Typically the main driver for carrying out such reviews has been to find land for housing, and whilst this cannot be ignored and will clearly be a factor driving and underpinning a review, any pan-London review should in the first instance seek to identify opportunities to enhance this space, in the interests of making this space work more effectively to meet the needs of a growing population. The delivery of housing alongside this as an enabling tool might be an outcome of this, but it should not necessarily be the central driver.

41. As noted above given the inverse relationship between Green Belt and Metropolitan Open Land a pan-London review should consider both designations simultaneously.

42. The current Metropolitan Open Land policy in the London Plan is similarly in need of review. Whilst Green Belt and Metropolitan Open Land are often viewed as one and the same when determining planning applications which affect them (a consequence of the current London Plan policy), and they share certain common characteristics (i.e. their openness and permanence), their purposes are distinct, and policy should recognise this. The current London Plan policy for MOL essentially repeats and applies national Green Belt policy, and whilst it might be appropriate to build on the NPPF, future MOL policy should define its own tests for judging appropriate development and “very special circumstances.”

43. Alongside the above we would also encourage the GLA to prepare advice on the methodology for undertaking a review, to inform any further revisions following a pan-London review. Such advice is particularly lacking at present in the case of Metropolitan Open Land, with the current London Plan containing only a brief description of the criteria used to define MOL, and would benefit from further commentary on how such criteria should be measured and interpreted. The absence of any advice on scale in particular is a particular deficiency and has resulted in anomalies in the geography of Metropolitan Open Land across London. Again this was an issue highlighted by RPG 3 at the time, which called for greater consistency between Boroughs when designating such areas. Crucially such guidance should also seek to define the characteristics of Metropolitan Open Land and how it is distinct from Green Belt. This will be essential to ensure that the appropriate designation is used.

44. In defining criteria for Metropolitan Open Land it should not be constrained by the broad principles underpinning the definition of Green Belt, which at present disregards matters such as landscape quality and accessibility. It is therefore argued that these should also factor in any review of Metropolitan Open Land policy too.

45. In conclusion, a full structural and strategic review of Green Belt/MOL policy is needed to include environmental quality and recreation factors, with any boundary reviews following from this new methodology. Such a review together with the selective and perhaps partial release of some Green Belt/Metropolitan Open Land could be a prime mechanism to deliver the usable green space that is demanded by the huge demographic and housing growth in London. The alternative to this will see a continuation of the present unsatisfactory situation, which in Development Management terms will involve boroughs continuing to manage applications in an ad hoc fashion through the departure route, and in Plan Making terms will involve individual borough led reviews (typically driven by housing need). Both

processes will frequently be underpinned by isolated thinking, and lack the input of a strategic vision for the wider network of green space. The outcome of which will see a constant chipping away at the green belt, which will only erode the usefulness of the policy and popular willingness to accommodate new development.

Transport and Physical Infrastructure

46. **General Remarks** - We are pleased that the Mayor recognises the close and interdependent links between transport, planning, economic activity and growth, air pollution and public health. Ealing is the third largest borough by population and is growing by 3,500 people every year spanning inner and outer London. We will benefit from Crossrail/ Elizabeth Line and the redevelopment of the Southall Gas Works site which includes around 3,500 homes. Ealing is also impacted by HS2, plus many other developments, particularly at Old Oak Common/Park Royal and Heathrow expansion.

47. 'Radial' public transport and road links into/out from central London are relatively good but frequently suffer from overcrowding and congestion. Ealing's areas of poor air quality are predominantly attributable to road traffic and buses.

48. There are particular issues making 'orbital' journeys to other locations in west London, especially between Metropolitan, Major and District town centres. Public transport provision is often lacking and the road network can be very unreliable and slow for these journeys. In common with many boroughs, Ealing has issues with high numbers of short motorised journeys for example bus trips to stations and schools plus short car journeys, 35% of which are under 2km.

49. Ealing wants to create a 'step change' to cater for mass cycling and we have significant ambitions in this area which we want to work with the Mayor and TfL to realise.

50. **Planning/Development** - New developments should be sustainable and reduce the need to travel. Development should be of an appropriate density and mixed use where possible with high trip generating uses focused on good access to public transport and town centres. We welcome an increase in local affordable housing which will enable people to live closer to employment, education and services. Developments should mitigate their impacts on the transport network; this includes developer contributions to pay for mitigation and/or works to create good provision catering for walking and mass cycling.

51. In terms of servicing, all developments should be serviced off-street unless they can demonstrate exceptional circumstances. This is due to the lack of space available on London's highways and footways.

52. We want to see development at Old Oak and Park Royal bring new transport infrastructure, particularly pedestrian and cycle underpasses and/or bridges.

53. We ask that TfL is flexible and pragmatic to use its assets to benefit both users and the local community (for example high quality cycle parking). This includes land, particularly at Underground stations.

54. **LIP Funding** - We look forward to continue to work in partnership with TfL to enhance the transport network. We want to do more especially in terms of innovation in cycling and walking, road safety and asset maintenance, and would welcome any increased funding that could be provided to us.

55. We very much value the flexibility given to boroughs under the 'Corridors, Neighbourhoods and Supporting Measures' and 'Local Transport Fund' funding mechanisms. Boroughs frequently have issues with the funding and delivery of larger-sized, more challenging transport improvement schemes (usually £2m+ in value), such as large junction improvements or new bridges. We would welcome support that the Mayor and TfL could provide to address this.

56. We also value the work done by the WestTrans Sub Regional Partnership, particularly in terms of cross boundary projects and innovative projects within the west London sub-region. We want the Mayor to continue to support WestTrans with funding.

57. **Active Travel** - We are reassured to see an emphasis on active travel modes and would like to work closer with colleagues in TfL Streets (on the TLRN) and the Traffic Directorate (signals), especially to be consulted at an early stage with their work programmes. We are keen to see that all parts of TfL should be 'on message' and working to increase and improve walking and cycling. We want to see development at Old Oak and Park Royal bring new sustainable transport connections, particularly pedestrian and cycle underpass and/or bridges.

58. **Walking** - We welcome the Mayor's renewed focus on walking as a very important mode of transport and its benefits to public health.

59. **Cycling** - Ealing wants to create a 'step change' in provision to cater for mass cycling. We have significant ambitions in this area and have set up a 'Cycling Commission' to make this happen. We welcome the commitment to cycling expressed by the Mayor, especially the increased funding which we hope to benefit from.

60. We want to see the East-West Cycle Super Highway progressed to Acton and would like to be actively involved (including possible alternative routings such as along the parallel A4020 Uxbridge Road).

61. We have concerns over poor standards of driving (as shown in road casualty analysis) and reduction in police resources to tackle cycle theft, which are discouraging people from cycling. We would like more support from TfL in terms of road user education plus increased traffic enforcement and cycle theft prevention/detection by the Metropolitan Police to support cyclists.

62. We consider that there is a strong need to improve the quality of cycle parking provision, including in new developments. Whilst cycle parking may be provided in reasonable quantities, it is often unusable being cramped and inconveniently located. WestTrans have produced guidance on the quality of cycle parking and would like to see such standards formally adopted across London.

63. **Road Network and Streets** - We welcome the Mayor's proposed 'Healthy Streets' initiative to focus on walking, cycling and public realm improvements. Ealing is keen to be in the forefront in piloting such projects.

64. We consider the role of smoothing the flow of traffic to be important particularly in terms of reducing emissions and noise. Ealing has successfully replaced traffic signals with other traffic management solutions in certain locations to public and professional acclaim. We also call for more funding for Principal Road Renewal for boroughs. This is particularly important as many of these roads are also key bus corridors.

65. **Schools** - We would like the Mayor to recognise the positive impact made by sustainable school travel and associated road safety initiatives including school travel plans. It is important to get future generations into positive sustainable travel habits, particularly walking and cycling short journeys. There are issues with children using bus services for very short journeys and adding to morning overcrowding as an unintended consequence of free travel provision.

66. **Pollution/emissions** - We welcome the Mayor's new focus on this area and in particular the positive effect that sustainable transport can have towards improving air quality. Many locations in outer London, such as the A40 corridor have very poor air quality.

67. We appreciate the Mayor's plan to extend the ULEZ, however the current proposal would see the A406 used as the boundary which could give rise to significant boundary dis-benefits for Ealing. We would like the ULEZ to cover all of Greater London and Heathrow Airport in particular. We want to see an emphasis on reducing short motorised journeys by encouraging people to switch to active travel modes whenever possible (for example cycling to stations) and encouraging home deliveries.

68. **Electric Vehicles** - There appears to be no mention of electric vehicles in the document. We seek prompt clarification of the Mayor's position on this issue, particularly the need to co-ordinate networks above borough level.

69. Off-street charging provision is key and we want to see the London Plan charge point standards at least maintained and implemented effectively across London. We also think there is a big opportunity for the commercial use of electric vehicles, for example deliveries. Also local power networks may need to be upgraded in order to support increased demands on the system. These issues need to be co-ordinated, promoted and incentivised across London.

70. **Road Safety/Road Danger Reduction** - We welcome the Mayor's new focus on road danger reduction and an emphasis on the cause of collisions, usually motor vehicles and how they are driven.

71. We also appreciate the Mayor's support for more 20mph limits and our ambition is to roll out 20mph across the borough.

72. We would like to see 'rate-based' road casualty targets in new MTS such as those used in the Ealing LIP. These would more accurately show the risks involved and

avoid the unfortunate situation where increases in cycling create a negative news story if the absolute numbers of casualties can also increase.

73. We note with concern the stubbornly high rate of motorcycle casualties and this needs action above borough level to make a real difference. We would like to see TfL offer free 'Bike Safe' courses across London.

74. **Delivery and Servicing** - Commercial vehicles are a significant source of pollution, congestion and noise. There needs to be support for 'Delivery and Servicing Plans' across London, particularly by TfL. This could be a significant tool in the delivery of air quality benefits.

75. **Buses** - We welcome the commitment of the Mayor to make London's bus fleet cleaner by phasing out diesel buses and only procuring low/zero emission buses after 2018, plus retrofitting existing vehicles. This will improve air quality across London including Ealing. We believe there are issues with a high number of short bus journeys being made which causes overcrowding and would urge TfL to look for solutions.

76. **London Underground** - We have strong concerns over the current poor state of the Piccadilly Line Underground service. Due to frequent overcrowding and poor reliability, local residents have severe problems using this service, especially to access jobs in central London. The planned upgrade programme (including new trains and signaling) has already slipped from 2015 to the 'mid 2020's' under the previous Mayor. A commitment to Piccadilly Line improvements should be a priority for the new Mayor, particularly as Heathrow Airport expansion is planned.

77. There are also overcrowding and reliability problems with the Central Line. The Line was last upgraded in the 1980s with trains and signals. A commitment needs to be made to the next upgrade before the current equipment becomes life-expired.

78. Step-free access improvements for stations should be a priority for the Mayor. Schemes should be prioritised according to the user benefits, such as those near large developments such as North Acton.

79. **Rail** - We welcome the Mayors desire for better co-ordination and integration of the rail network in London into the transport system and look forward to working in partnership to achieve this.

80. **Taxis** - We want to see better customer service standards from all taxi and minicab drivers.

81. **Car Clubs** - There is no mention of car clubs in the document. We consider car clubs to have a significant role within the transport system, particularly with the growing population and intensification of development, especially in outer London. We want the Mayor and TfL to actively support the growth of car clubs across London.

82. **Heathrow Airport** - As the government has committed to the expansion of Heathrow Airport, we look forward to Mayoral support to obtain funding and other resources from both Heathrow Airport and the government to mitigate the effects. This

is particularly true for the transport network which is already full at certain times, for instance the Piccadilly Line and the A312.

Social Infrastructure

83. Provision of social infrastructure in London, especially in the current context of changing demographics and constrained funding, is a question of restructuring the delivery of services as a whole rather than ad hoc additions and mitigation.

84. In this context London is much more fortunate than those areas of the country with static or falling populations which therefore lack development activity as an enabling mechanism. In particular, there is an opportunity for development to achieve genuine lifetime neighbourhoods through the co-location of social infrastructure with housing and in shared facilities for multiple infrastructure types which increase flexibility and reduce capital and revenue costs to providers.

85. However, the complexity of delivering facilities for health infrastructure in particular is challenging for both local authorities and CCGs and contributions are often incorrectly set or not ultimately taken up. In developing its plans the GLA needs to commit not only to planning essential social infrastructure but also to co-ordinating its delivery where boroughs and providers cannot, including the commitment of staff to advising and implementation roles.

86. A commitment to a strategic overview of healthcare, education, childcare and community provision is therefore welcomed.

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December 9th 2016