

A City for All Londoners

London Borough of Camden Response to consultation

The London Borough of Camden welcomes the publication of A City for all Londoners and the opportunity to comment on it.

The aspirations and strategic direction set out in the document align closely with the Camden's vision and objectives set out in the Camden Plan and other Council strategies and we therefore welcome them. We particularly welcome the emphasis on social inclusion and opportunities for all which echoes the overarching vision of the Camden Plan to make the borough "a place where everyone has a chance to succeed and where nobody gets left behind".

Camden is leader in developing and delivering solutions on number of the matters mentioned in the document, in particular in our work on:

- homelessness;
- air quality and local energy provision;
- making the best use of public sector assets;
- sustainable transport; and
- workspace for small and medium businesses.

Further detail on these matters is set out below. The Council would be happy to discuss this work further with the Mayor and GLA officers to explore how our expertise can contribute to achieving the aspirations set out in A City for all Londoners and how we can work together towards achieving our mutual goals.

We note that A City for all Londoners is a strategic document and provides little detail on how the Mayor intends to achieve his aspirations. We would therefore encourage the Mayor to give boroughs the opportunity, whether formally or informally, to feed into or comment on emerging detail in the London Plan and other Mayoral strategies prior to their publication for consultation. We would also urge the Mayor to ensure that the London Plan and other strategies include the flexibility within the London-wide strategic framework to allow boroughs to develop their own approaches to reflect their local circumstances.

The comments below are intended to inform the production of the London Plan and other Mayoral strategies. They broadly follow the structure of the consultation document but, as many themes appear throughout the document (e.g. environment, transport, social integration), comments on particular matters may also be relevant to other sections.

Part 1 - Accommodating growth

The consultation document refers to a need to build at least 50,000 homes per year. As recognised in the consultation document if the approach taken is to meet as much of this growth within London as possible it will mean taking bold measures. While Camden supports the measures set out in A City for all Londoners (higher density development, transport infrastructure as a catalyst for growth, increasing use

of public sector land etc.), these are largely existing policy. It is questionable whether the measures set out in the consultation document alone will deliver the significant increase in housebuilding necessary to meet London's needs. Other measures will therefore be needed. Focussed green belt reviews to ensure that such land is still meeting its intended purpose, with release in suitable locations if it is not, could play a significant part in meeting London's extensive need.

The proposed approach to protecting the green belt will mean greater pressure and impact from growth on existing areas and communities. Growth needs to take place in a way that does not harm what makes London such an attractive place to live, work and visit. It is therefore essential that the consultation document's recognition that growth needs to be properly planned, consider existing residents and create desirable places to live is taken forward into the London Plan.

Camden welcomes the Mayor's statement that he will resist moves to convert offices to housing unless they are justified, although we would support it applying to other important employment areas within the capital rather than just central London as set out in the consultation document. We have introduced Article 4 Directions to protect offices in the borough and ensure that when a change from offices to housing is justified that the resulting development meets our planning policies and provides affordable housing where appropriate. The Mayor should lobby the government against permitted development rights that allow the conversion of B1 offices and B1c light industrial uses to housing without planning permission.

We welcome the recognition that industrial activity and housing can co-exist in appropriate circumstances and the intention to think creatively about how we use land and promote a mix of uses. Through its Local Plan review Camden has redesignated part of its industry area in Kentish Town as an employed-led mixed use growth area. This will deliver substantial new homes and jobs while providing space for growth sectors, re-providing industrial uses and bringing many other benefits to the local community. The London Plan should be amended to facilitate and encourage such schemes.

Good growth

Camden supports the principles of 'good growth' to ensure development creates well designed, desirable places that are green and healthy and well served by infrastructure. We particularly welcome the target of 50% of new homes to be affordable. The homes provided need to be genuinely affordable across a range of tenures. Good growth needs to include consideration of design, heritage and local distinctiveness. The Mayor must ensure that this is recognised in the London Plan. We note that in the consultation document these issues are covered in Part 4 rather than in Part 1 on accommodating growth.

The quality of the public realm also plays an important role in unlocking growth and this should be recognised. There is a wealth of evidence to demonstrate its role in supporting and sustaining business, revitalising town centres, boosting economic performance and supporting regeneration. Indeed, developers have gone on record to say that public realm enhancements are a trigger for new development activity when they are delivered alongside public transport improvements; for example, they

are looking to Camden's West End Project to help realise the regeneration benefits of the new Crossrail services.

Role of CIL / s106

The consultation document rightly emphasises the need to deliver more affordable housing, along with the transport infrastructure and social infrastructure needed to support growth. Section 106 agreements and the Community Infrastructure Levy (CIL) together play a crucial role in delivering on these priorities. Camden is aware that the Government is currently reviewing the role of planning obligations, and we would urge the Mayor to seek to ensure that any changes to the national planning system do not reduce the ability of the Mayor and local planning authorities to use these tools to secure infrastructure and affordable housing provision in the future.

Cultural capital

The Council is pleased to see such a strong emphasis on arts and culture running throughout the plan - with a clear view on the many ways that arts and culture can play a key role in achieving strategic objectives. Camden has thriving, and growing, arts, culture, tourism and research sectors across the borough, and recognises the huge part all these elements play in economic growth, placebuilding and well-being, with a strong commitment to support, grow and work in close partnership with these sectors.

We welcome the importance placed on protecting the 'cultural infrastructure', and the concern that diverse cultural activity must not be "squeezed out because of wider development pressures". The importance of significant venues and cultural spaces is highlighted in the report and the we have found that our venues are used by highly diverse communities. We are pleased to see mention of the London 'cultural infrastructure plan' to inform spatial and transport planning.

Whilst we appreciate that not all arts and creative organisations can be included in the list of cultural spaces under cultural capital, we would welcome the explicit recognition of the services that libraries provide. Our research has found that libraries are used by many vulnerable groups. This includes homeless people, as well as rough sleepers. Libraries are also used by individuals who may be experiencing poor mental health, as well as those facing high levels of isolation or loneliness.

We believe that participation in the arts can do much to co-deliver public health messages. There is considerable evidence on the benefits of using the arts and creativity to facilitate health based learning as well as delivering to Clinical Commissioning agenda. In addition, arts based participatory activity supports user engagement with physical activity, both in terms of starting and continuing to engage.

Developing higher density areas is likely to have a cultural impact, requiring either an increased cultural offer or efforts to protect the cultural offer already available. It is positive that the Mayor of London highlights the need for developers to build with the local (cultural) environment in mind. We support the adoption of the 'agent-of-change' principle and developers bearing the costs of soundproofing new homes, relieving pressure on existing venues.

High housing density should not mean a lack of access to culture available locally. Where high density housing is planned, culture, as a vital part of the fabric of the city, should be recognised and built into all developments. We advise that steps be taken to ensure that there is a corresponding increase in cultural provision that is accessible and appropriate to the needs and interests of residents with due recognition given to the local demography. We welcome the proposal to embed cultural objectives into regeneration interventions.

Transport infrastructure

The consultation document does not mention the splitting of the Northern Line, a proposal for which has been in development for over a decade. It is estimated that a split offers an opportunity to significantly increase capacity on this line – up from 22 to 32 trains an hour in the peak. This proposal will require significant upgrades to Camden Town station to provide an interchange. A new station entrance is already being planned but it is unclear whether these proposals are part of the longer-term ambitions for the northern line or whether they are future-proofed for future changes. Camden therefore requests an early discussion on the long-term plans for the Northern Line to understand how they fit with current planned works, how they will be delivered and the impacts on Camden.

Camden supports Crossrail 2 in principle because of the transport benefits that it offers to Camden residents, businesses and institutions and to London as a whole. However, the Council is deeply concerned by TfL's current plans for the Crossrail 2 station at Euston that show around 130 homes and 17 businesses may be directly affected by its construction. This results from uncertainty over the redevelopment of the current Network Rail station at Euston. Since TfL published the current plans the Council has gained assurances from government that include a commitment to the integration of Crossrail 2 into the governance of plans for redeveloping Euston Station. This is a result of the Council's hard fought campaign opposing the HS2 Bill currently before Parliament. We are optimistic that this will provide the opportunity for TfL to revise their proposals to significantly reduce the impact on residents and businesses in the Euston area.

The Council wishes to work positively with Mayor and TfL to ensure a comprehensive approach is taken to integrate Euston / HS2 / Crossrail 2 that provides the best transport solutions and also minimises the impacts on Camden's communities.

With regard to High Speed 2, it is essential that the Mayor works with relevant boroughs to push for HS2 to be constructed in the most environmentally-sensitive manner possible to minimise construction impacts. For example, the use of rail should be maximised to carry construction material while the amount of construction traffic generated and the impacts on nearby communities should be minimised. In addition, it is essential that construction vehicles and their drivers operate to the latest and highest standards. The Mayor should also continue to work with Camden, Network Rail, HS2 and other parties to secure a comprehensive redevelopment of Euston Station in response to the need to provide a world class integrated transport interchange that meets future needs with significantly increasing passenger numbers.

Linked to this, and another concern particularly related to growth, is the need to control construction traffic levels and the safety of vehicles and driver standards particularly through the procurements process. Camden has used its procurement and planning mechanisms to address work related road risk to improve road safety and also the perception of danger which is the primary barrier for Londoners taking up cycling. CLOCS is the national standard for managing work related road risk within construction, to address the disproportionate risk large vehicles pose to vulnerable road users. It requires construction clients to manage their sites according to good traffic management principles, whilst ensuring they use suppliers who are Fleet Operator Recognition Scheme (FORS) accredited, with trained drivers who deliver in vehicles with minimal blind spots. TfL funding has enabled us to implement a policy for our own contractors operating vehicles to improve the safety of their fleets and also incorporate the CLOCS standard as a section 106 planning obligation. Camden is leading the way in this area, by monitoring compliance, engaging with industry and proactively contributing to development of these standards and is therefore in a pivotal position to support others in adopting the same approach. The Mayor should continue to support boroughs to implement and monitor CLOCS.

Part 2 - Housing

As one of London's most polarised boroughs by income, we recognise and strongly endorse the picture of London's housing crisis painted in this chapter and also the acknowledgement of the complexity and long term nature of the issues.

Rough Sleeping

Levels of rough sleeping have increased nationally, across London and in Camden. As such we very much welcome the Mayor's commitment to tackling the issue. This reflects the work Camden Council is doing to revise our approach to addressing rough sleeping through the "Routes off The Street" strategy and our commitment to maintain investment in specialist front line services even in times of reduced funding for local authority services.

Camden is represented on the Mayor's "No Nights Sleeping Rough" Taskforce and we look forward to working with him on developing consistent interventions across London that mean that people already sleeping rough and those who may do so in the future are offered the support and assistance they require.

Homelessness

Camden has one of the best track records in London on preventing homelessness. We have the lowest number of homelessness acceptances per 1,000 population and the fourth lowest proportion of households in temporary accommodation per 1,000 population. We have achieved this by investing in helping households to remain in their homes, securing private rented accommodation, or for single vulnerable people referring them to our Adult Pathway. However due to the housing crisis in London, it is becoming increasingly difficult and expensive to prevent homelessness and harder to move households on from temporary accommodation into permanent accommodation.

We work with other London boroughs to secure efficiencies in the costs of nightly paid accommodation. Further London-wide projects, if scoped with care and supported robustly and consistently, could also help reduce costs against the very difficult housing circumstances in London. The Mayor's leadership here could be beneficial. However the scale of the housing crisis and lack of affordable housing supply, is such that for Camden and most other boroughs, the reality is that in many cases affordable housing for homeless households can now only be found outside London.

We are concerned about the potential financial impacts of the pending Homelessness Reduction Bill. Whilst we support the principle of providing greater support and advice to more people at risk of homelessness, we fear that additional casework, assessment and review services required by the Bill will significantly increase workloads. Without additional funding, this will impact on our ability to prevent priority cases from becoming homeless and moving into temporary accommodation. We are keen to work with the GLA, London Councils, LGA and DCLG to ensure that the bill is a success and can achieve its aim of reducing homelessness.

We believe Camden has particular expertise in the field of homelessness and we would be keen to take a leading role in work with the Mayor and London boroughs to build on our success, albeit in the challenging context of the lack of supply of affordable accommodation and the new Bill.

Affordable housing

Camden welcomes the Mayor's focus on affordable housing and supports the target of 50% of new housing built across the city as affordable. While we recognise that this level of affordable housing may not be viable in every development, particularly in Central London, nonetheless we are strongly committed to mixed-tenure communities in Camden and would oppose any approach that led to London's new affordable housing being constructed predominantly in Outer London.

We welcome the recognition of the need for a variety of types of affordable housing. Camden is in favour of intermediate rent products - we have recently published an intermediate housing strategy and are setting up a housing company to let a small number of new-build council properties at intermediate rent. The London Living Rent is a welcome addition to the range of affordable intermediate housing products. The Council has already been in discussion with the GLA on how London Living Rent would work in practice and is keen to be involved further in its development.

Boroughs should have the flexibility to determine the mix of affordable housing tenures in their area. While we recognise that shared ownership is appropriate for other parts of London, in Camden even 25% shares are largely unaffordable for most households and for this reason the Council has redesignated the affordable new builds in its regeneration programme from shared ownership to affordable intermediate rent. Long term renting is now a fact of life for many Londoners and for affordability reasons, it cannot just be seen as a staging post to home ownership.

We welcome strong support for low cost rented homes in "A City for All Londoners". Social housing makes up a third of all households in Camden and target/social rent is a crucial part of the affordable housing picture. Social housing tenants are an essential part of Camden's social mix with many of Camden's families with children and older people living in social housing. While the scarcity of social housing means that new social housing tenants are increasingly vulnerable, a majority of our working-age tenants are in part time or full time work. Consequently we would oppose expansion of other forms of affordable housing at the expense of social housing. We see the higher value voids provision of the Housing and Planning Act as a major risk to the future of Camden's social housing.

We would look to the Mayor to use his current housing programme and any new powers or funding devolved to him by government to support continued mixed-tenure communities in all parts of London. For example, if Camden were forced to sell off some high value vacant stock, we would seek access to the receipts to replace this social housing in Camden.

The Council itself can be part of solution to the housing crisis. Through its Community Investment Programme (CIP), Camden is an important developer of social rent, intermediate rent and market housing in the borough. As such we welcome the increased grant rates for London Affordable Rent products announced in the Mayor's Affordable Homes Programme funding guidance. However the investment regime remains challenging, particularly for Inner London boroughs, for example in areas such as right to buy receipts and timescales. We recognise that these are not necessarily within the Mayor's gift to resolve and we would urge him to seek a devolution settlement that gives London government much more flexibility. Combined with the affordable housing funding settlement, this would allow Camden and other boroughs to make a significant contribution to the 90,000 target.

Building more and increasing housing supply

While intensification of housing, particularly around transport hubs, is an important part of the solution to London's housing crisis, developments must be appropriate and address local residents' concerns. The recent case of 100 Avenue Road where both Camden and the Mayor rejected planning permission for a large tower close to Swiss Cottage station only for it to be approved by the Secretary of State, demonstrates the pitfalls of densification. The council and residents also objected to the lack of affordable housing in the proposals which underlines the importance of affordable housing to "good growth".

In terms of public sector land, all public bodies including boroughs face competing demands - whether to use land for operational purposes, capital receipts or affordable housing. We would expect to see the Mayor leading by example by delivering 50% affordable housing in housing developments on GLA Group land. Camden would support the Mayor's intervention to unlock surplus NHS land for housing. . Camden is part of a North London health devolution pilot on health and social care estates and future capital investment is predicated on disposals, as outlined in the North London Sustainability and Transformation Plan. However the scale of the financial pressures in the local NHS may limit the amount of affordable housing on this land.

Private rented sector

Camden continues to host the London Landlord Accreditation Scheme. The scheme accredits landlords and agents across London and the Southeast offering continuous professional development. There are currently 17,000 landlords accredited in London & 1,300 agents. Last year 1,156 landlord/agents attended Official Landlord Accreditation Training and 363 attended continuous professional development courses. In May 2014 the scheme became part of the London Rental Standard; a mayoral scheme to promote accreditation across London.

We would like to see accreditation promoted as part of licensing schemes (e.g. discount on licenses for accredited landlords) and that for all homeless PRS procured that landlords need to be accredited.

Self-build

The consultation document refers to the need to diversify housing delivery sources in order to build the homes London needs, including support for smaller housebuilders. While this is supported in principle, Camden would like to highlight its concerns regarding the government's current self-build regulations, which place requirements on local authorities to maintain lists of eligible parties who have an interest in self build, and to deliver land to meet demand. In inner and central London locations in particular, the delivery of land for self-build is not a realistic or viable proposition given the cost of land and the high density and often mixed use nature of development that comes forward. A different approach to self-build is therefore needed for London, which recognises the constraints on delivery in many locations, where other forms of housing delivery are more appropriate and realistic. We would therefore urge the Mayor to seek changes to the government's current position to allow an approach to self-build that responds to London's characteristics and constraints, in the context of a wider strategy to deliver a range of housing types in the capital.

Accommodation for travellers

The current London Plan provides little in the way of a London-wide strategy for providing accommodation for travellers (and there is no mention of traveller accommodation in the consultation document). We would urge the Mayor to use the review of the London Plan to take a lead on this matter and set out a co-ordinated strategic approach.

Part 3 - Economy

Camden strongly supports the establishment of digital infrastructure as a key utility central to planning and new development and welcome the appointment of a Chief Digital Officer to champion growth of sector and digital inclusion.

We also support the link made between the EU vote, controlled immigration and the call for powers over skills delivery.

London's growth sectors are Camden's Growth Sectors (professional, technical services and business administration; creative industries; science and technology). These are represented on the Council's strategic partnership with business, the

Camden Business Board, in the form of Grant Thornton, Google and the Francis Crick Institute. The Camden Business Board is conducting a campaign to promote Camden as great place for business – particularly Kings Cross & Euston as a Hub for the Knowledge Quarter including life sciences.

Workspace

Camden is a leader in securing and protecting workspace for small and medium enterprises (SMEs) and we would welcome the opportunity to work with the Mayor and the GLA to further develop approaches to this. Our work to date has included:

- Planning policies to protect, support and promote space that is suitable and affordable for SMEs, particularly those from growth sectors, SME business space secured at less than market rent in mixed use developments, and special protections for jewellery sector workshops in Hatton Garden.
- Article 4 directions exempting business areas from office to residential permitted development rights.
- Investing in new SME workspace. We have funded and supported Camden Collective in providing meanwhile spaces on Camden High Street and at the National Temperance Hospital with a creative tech specialism; funded the fit out of new jewellery workshops; and secured new employment space through the Council's own construction programme – the Community Investment Programme – including a co-working building, refurbished workshops and low cost incubator space.
- Maximising Council assets to increase SME workspace supply and support growth, such as re-purposed Council offices to provide SME incubator, and reviews of housing and commercial property portfolios.
- Working with business partners through the Camden Business Board to lobby Central Government to challenge office to residential permitted development rights.

Workspace, including flexible, managed workspace is becoming increasingly expensive in Camden, as in other parts of London. Camden's new Local Plan facilitates the provision of affordable workspace. We would welcome guidance from the Mayor or case studies for how to define affordability.

Creative industries

We welcome proposals to support creative 'maker' spaces through Creative Enterprise Zones/Creative Land Trusts. Camden has a long history of arts and creative incubation; for example, Cockpit Arts' head office is in Holborn where they offer a range of support for small scale crafts businesses. This this space is under considerable pressure in Camden, especially in Hatton Garden, and we look forward to more detail on the Mayor's approach. Additional funding would allow our key organisations to expand training programmes across a wider demographic.

There is considerable evidence that demonstrates the importance of the cultural and creative industries to the UK economy. We recognise that this works in multiple intersecting ways with a circular relationship between the publically funded arts sector and the creative industries. We are pleased to see mention of the draw of London's culture for international businesses, the value of which should not be under-estimated. Equally it should be noted that London's culture and creative industries are a key growth economy.

There is also the vital role that culture and the arts can play in supporting the educational, training and hence employment needs of young people, particularly those who are NEET. A number of Camden based arts organisations have offered apprenticeships to young people, particular mention to the British Museum and the Roundhouse who have facilitated a number of trainee positions for young people, targeting within this BME young people and those from disadvantaged socio-economic groups. The London Borough of Camden has worked successfully with The Hospital Club over the last decade to create ten paid traineeships at the organisation for local young people.

Education and skills

We support the Mayor's proposal to encourage school aged girls to consider STEM careers. The Council has established the STEAM Commission which aims to link schools and businesses with the aim of increasing the engagement of young people with careers in these subjects.

It is a strength of A City for all Londoners that the need for skills development for adults has also been prioritised. Education has not always been well positioned to keep up to date with the skills needs of the twentieth century, leaving some adults in a vacuum, lacking key skills in growth areas such as digital, tech and the creative industries.

We strongly agree that culture can improve community participation, raising both individual and collective sense of citizenship – and bolstering social integration – an example of this would be the excellent work delivered by the Camden organisation Pan Arts through workshops and performances with young people who are marginalised and at risk of social exclusion, including immigrants and refugees.

Regarding increased hotel provision, boroughs must be supported to have the resources needed to cope with the demands on them created by additional visitors. We therefore support the introduction of a Hotel Levy.

There is no mention in the consultation document of the role that BID's can play in supporting the economy in general and the creative economy in particular. There is also mention of supporting businesses through rates revaluation which will have a particularly impact in London.

Camden welcomes the proposed setting up of an Economic Fairness Team. This should consider flexible working in addition to the other measure mentioned in A City for all Londoners.

Encouraging employers to pay staff at least the London Living Wage (page 51), is an important policy linked to affordability, and this needs to filter through procurement and contracts as is the case at Camden Council.

Part 4 - Environment, transport and public space

Environment

A City for all Londoners has a strong environmental focus covering issues such as carbon reduction, air quality, flood risk, green infrastructure, energy efficiency of housing and fuel poverty. This aligns with Camden's aspiration and commitments on these themes and is therefore welcomed.

Air Quality

The proposal that all developments become air quality positive, rather than simply air quality neutral is welcomed. Camden looks forward to inputting into the formulation of the Mayor's Environment strategy in relation to this matter and any updated versions of Supplementary Planning Guidance on air quality issues.

We welcome the Mayor's commitment to influencing national policy, including pushing for an update to the Clean Air Act, Vehicle Excise Duty reforms, and maintaining air quality commitments and standards set by the European Commission.

Regarding plans to improve air quality involve promoting electric vehicles, the Council recognises the role that infrastructure plays in mainstreaming this technology (for example within the Council's Clean Air Action Plan 2016-2018). Measures to improve electric charging infrastructure throughout the City should therefore be included as part of the Mayor's strategies to tackle air quality.

Camden welcomes the proposals for an Emissions Surcharge (or 'Toxicity Charge') and proposed changes to the Ultra-Low Emission Zone (ULEZ), which will help reduce emissions from vehicles in London. The Council will be responding directly to the public consultations on these proposals. While these proposals and other policies on reducing emission from buses are welcome, we would like to see consideration of measures to reduce emissions from taxis, which will be exempt from the ULEZ but are responsible for a significant amount of pollution in Camden.

Camden has worked closely in the past with the GLA on projects aimed at raising awareness of air quality. We led on the London-wide Breathe Better Together campaign, and our work with Great Ormond St Hospital has been nationally recognised. We would be keen to work further with the Mayor in partnership with colleagues in Public Health on awareness raising projects and campaigns to help provide information on poor air quality to all our residents.

Camden is also taking a leading role among London boroughs in our work to reduce emissions from diesel. Our Freight Consolidation Centre is the most well established scheme of its type in the capital, and we are currently working to procure a low emission fleet and have also introduced a diesel surcharge for resident parking permits. We would welcome the opportunity to work with the Mayor on the next steps for these policies, including differential tariffs based on emissions for pay and display parking bays. We would be also be particularly keen to collaborate with the Mayor in support of his lobbying of national Government on diesel. We are closely aligned with the Mayor on supporting changes in Vehicle Excise Duty and a national

scrappage scheme for diesel vehicles, both of which would significantly impact on central London's air quality.

Energy and carbon

Camden is at the forefront of London's programme for local having worked closely with the GLA's Decentralised Energy Project Delivery Unit to develop and deliver both Somers Town Energy and the Gospel Oak energy network. Somers Town Energy has been fully operational since October 2015 and connects 350 homes to a new Camden owned energy centre near Kings Cross. The network is designed to expand to new Council led development in the area and the Francis Crick Institute, with connection agreements secured through the planning system. Somers Town Energy won the national 2015 H&V award for best district energy project. The Gospel Oak project sees waste heat captured from the Royal Free Hospital and redirected to over 1,400 homes in the area. Camden is now assessing two new project opportunities in Kentish Town and Bloomsbury under the Government's Heat Network Delivery Unit programme. We look forward to continuing to work with the Mayor and the GLA on decentralised energy.

We welcome the commitment to achieving a 'zero carbon' London by 2050, zero carbon homes and supporting local authorities' carbon offsetting schemes to support the zero carbon target, and decentralised energy generation through renewable and low carbon technologies.

We note the intention to establish a London-wide not-for-profit energy company that can offer retail energy supply to residents. Camden supports the Mayor taking a lead on retail energy supply arrangement and have paused work on its own dedicated Camden Energy company in light of the Mayor's proposals.

The Council considers that A City for All Londoners does not go far enough in relation to the role of embodied carbon, although Camden welcomes the measures to support emissions reductions in existing buildings and look forward to seeing the results of the zero carbon retrofitting trial, particularly as the Council's planning policies encourage the reuse and retrofit of existing buildings over demolition and rebuild.

Water and flood risk

'A City for All Londoners' could have been more explicit with regards to the need to manage flood risk and increase water efficiency in development, given the impact that increasing development, loss of permeable land, and population growth has on drainage infrastructure capacity and water quality.

It does however highlight 'nature based' approaches and the importance of green infrastructure in alleviating flood risk, an approach supported in Camden's Local Plan (Policy CC3: Water and Flooding).

The new London Plan should promote measures to retrofit SUDS into existing schemes and measures to reduce water use and encourage reuse.

Transport

Camden's transport aspirations align very well with the Mayor's, as documented in our Camden Plan and Transport Strategy. In particular the Mayor's commitment to reduce inequality, tackle disadvantage and ensure that everyone benefits from the capital's opportunities and success is one that Camden fully endorses. The Mayor's objectives for transport similarly reflect Camden's aspirations to reduce traffic and make London a healthier, safer, cleaner and more attractive place to work, live, visit and do business. Camden's long-standing policies as well as experience in addressing all these challenges means that the borough has an excellent understanding of best practice and is leading the way in many areas. We look forward to working together with the Mayor, the GLA and TfL to help deliver our shared transport ambitions.

Camden particularly welcomes the focus on enabling more sustainable, active travel choices, and the Mayor's acknowledgement of their contribution to addressing multiple transport challenges, place making, enhancing people's quality of life and London's reputation as a world class city. We also support the Mayor's intention to focus growth around well-connected locations (current and planned) in order to improve accessibility, but also to minimise travel by car. Enabling different uses of the street at different times of the day is something that the Council favours and will be delivered as part of our innovative proposals for the West End Project (WEP). It is recognised that re-timing deliveries will need to be part of this approach to make the most efficient use of space.

Transport and the way we travel impact on every facet of daily life; realising the opportunities that transport brings while minimising its negative impacts underpin London's success and the potential for truly making it a city for all. A business as usual approach will not be sufficient to make the capital fit for the 21st century. A bold approach is needed to transform the city, and we are pleased that the Mayor is prepared to make bold decisions on transport in the interests of all and the City's future. Camden has been at the forefront of transport innovation in London, and is recognised for its progressive approach, all of which have informed this response. We hope that the Mayor will consider Camden's input as a good starting point to achieving his vision, as well as continued partnership working going forward.

The following comments are intended to inform the development of the Mayor's Transport Strategy and help to ensure that the Mayor achieves his aspirations.

The consultation document makes multiple references to the essential role that transport plays in enabling people's access to essential goods, services, opportunities and networks, as well as unlocking growth and supporting regeneration. However, London's current serious problems deteriorating air quality, congestion and delays, and public transport overcrowding will also be exacerbated by growth, undermining the capital's economic viability unless urgent and bold action is taken. We therefore urge the Mayor to introduce a road user hierarchy to ensure that those transport modes which address these challenges are prioritised, as Camden has done by placing pedestrians, cyclists and public transport at the top of its road user hierarchy, and particularly to ensure that, in this environment of financial constraint, limited resources are focused on those measures that will deliver

the greatest benefits. We also recognise that there are 'hard' decisions to be made regarding competing and growing demand for limited space and resources and that balancing these competing demands can be a significant challenge. A road user hierarchy is a useful tool which will help guide decision making and help to ensure the right outcome for London at particular locations.

Camden's experience is that there have been inconsistent messages from TfL with regard to prioritising different road users which has resulted in a trade-off in the different benefits that can be realised, sometimes to the detriment of some road users and achieving greater benefits. A road user hierarchy will also help to ensure a consistent message from TfL, and provide policy support to the London boroughs to help them deliver the Mayor's objectives.

The Council notes the Mayor's intention to reduce traffic and car dependency, which we welcome, however, there is no indication of how this will be achieved. While it is possible to restrict traffic on specific streets, such as through the proposed Healthy Streets initiative, there is a concern that this simply pushes traffic onto other roads, including residential streets, and increases congestion and pollution elsewhere. This has been a barrier to getting support for some transport improvements, particularly for cycling, and will also not necessarily deliver modal shift away from car use.

As well as a road user hierarchy to guide decision making, the Mayor should therefore also review initiatives to restrict inessential car use to address potential impacts of traffic displacement. This potentially could include, for example, expansion of the congestion charge (including capturing the TLRN) or other road pricing mechanisms, and opportunities to reduce car ownership and parking (through the London Plan) such as car free and car capped developments. Camden's car free policies, which have been in place since 1998, have been very effective at managing car ownership and use, particularly in areas of high public transport accessibility levels (PTAL) which offer alternative travel choices. The borough is now moving towards car-free for all new developments for the whole borough as part of its new Local Plan. The innovative approach extends the traditional PTAL assessment to include accessibility to local services and opportunities such as jobs and health and education facilities, as well as the availability of a wider range of alternative transport choices such as cycling and car clubs, to determine the need for parking permits. On this basis, almost the whole of the borough has excellent or good accessibility.

The Mayor could also consider promoting a workplace parking levy for existing car parking opportunities as one way of helping to retro-fit car free development, and which could generate funds to support transport schemes. However, the impact on small businesses would need to be understood in advance.

The Council welcomes continued support for the Central London Cycle Grid and Quietways programmes. However, to be successful, continued funding needs to be made available to boroughs to implement the schemes on their roads. In this regard Camden advises that while Quietways are important to help encourage take up of cycling among less confident groups, high quality routes are still needed on main roads as these are often the most direct, meet cyclists' desire lines to destinations. Many main roads in London also function as high streets but suffer traffic dominance; high quality cycle routes on main roads will help to improve the look and

feel of the street while offering offer a highly visible alternative to car traffic which will help encourage modal shift.

Camden supports the proposals for Healthy Streets. A 'Feet First' approach for central London with safe and accessible streets should ensure that opportunities to green streets are maximised for health benefits, flood risk mitigation, air quality improvements and supporting biodiversity. This also has the potential to contribute to addressing existing area of green space deficiency or under-provision.

Other than Healthy Streets, there is very little mention of walking, particularly for shorter trips. Walking has the potential to help people easily meet the required minimum physical activity levels for health and reduce public transport overcrowding. There needs to be more promotion of walking for short trips and as a viable alternative to using the underground or bus for those people who are able to do so.

Road safety

With regard to road safety, the Mayor demonstrates support for 20mph speed limits in residential areas. However, data shows that, in Camden, collisions are generally higher on main roads, including on the TLRN, and these streets should also benefit from slower speeds where appropriate. Since Camden and Islington led the way with their borough-wide 20mph speed limits, in 2012 and 2013, more London boroughs have introduced, or are considering, borough-wide limits, and many are therefore way ahead of current Mayoral thinking with regard to speed restrictions. If a Vision Zero is to be realised, the Mayor needs a bolder approach to speed restrictions, particularly extending them to main roads as well as continued support for speed limits on the TLRN where appropriate, and rolling out TLRN 20mph limits if the current trials prove to be successful.

Partnership working with the police will also be fundamental to a Vision Zero outcome, particularly reducing danger at source, with a focus on enforcing against dangerous driver behaviour. This includes involvement in initiatives such as Operation Close Pass (piloted in the Midlands and also implemented in Camden) where police on bicycles enforce against motorists driving too close, as well as Operation Safeway established as part of the current Road Safety Plan.

Road casualties are not always necessarily linked to speed, but are a result of high levels of pedestrians moving around in traffic dominated streets (for example on Kilburn High Road in Camden). Measures other than speed restrictions are necessary to reduce casualties. Evidence shows that reducing traffic volumes has a significant impact on casualties, and initiatives such as Healthy Streets and other traffic restrictions should therefore be considered on those streets with high footfall and casualties regardless of speed.

The perception of road danger can also be a strong deterrent to people walking and cycling, as well as using public space, particularly for older people. This is usually the result of heavy traffic volumes and dominance which may not be dangerous in terms of casualty data, but is none-the-less frightening. Camden's work with older people's groups has demonstrated that, in many cases, older people and those with disabilities chose not to leave the house out of fear for their safety; this undermines their independence and isolates and excludes them from accessing essential goods

and social networks. Addressing perceptions, particularly by reducing traffic volumes, and improving the public realm, are essential considerations for reducing inequality.

Taxis, private hire vehicles and coaches

The consultation document does not mention taxis and private hire vehicles (PHVs): taxis in particular disproportionately contribute to London's poor air quality. While there are plans to upgrade the fleet, it is estimated that, with the current standard for taxi *replacement*, it could take more than a decade for the fleet to completely comply with ULEZ standards. On the other hand, providing rapid charge points to support improvements to the taxi fleet, as well as buses and commercial vehicles, will be a challenge in central London where available space - both public highway and private land - is at a premium. The section on housing refers to using TfL (or other public sector) land to provide essential affordable housing which Camden acknowledges is a priority, however, other appropriate uses, such as off-street rapid charge points and freight consolidation should also be considered as part of development on TfL land.

Camden has a long-standing concern about taxis over-ranking, particularly around stations, and engine idling. Camden would like to see either a re-configuration of the ranks or taxi marshalling as standard, as well as greater powers to enforce against engine idling; this would help to ensure effective use of the ranks, reduce idling and improve air quality.

Camden's experience is that there is overprovision of taxis at some locations and at some times of the day, for example at main line stations and evidence shows that taxi use is generally very low at 2% mode share. More strategically, Camden also requests the Mayor to investigate options for better management of the taxi fleet. This should include a review of the demand for taxis, and planning and provision of services across the whole central sub-region, rather than looking at individual locations, and consideration of a cap on licences. Moreover, in the context of growing demand on the transport network, taxi services need to be realistic with regard to the physical constraints to providing more ranks.

We note that PHVs have increased significantly in London in recent years, in response to a more convenient 'on-demand' economy which is likely to continue. More effective management of this sector is also needed to mitigate its impacts, particularly congestion, demand for kerb-space and road safety, and should similarly include a cap on the number of licenses.

Coaches are also not mentioned in the document: tourism is growing, and the Mayor states his intention to increase the number of hotels in London, particularly in outer London. Although tourism contributes significantly to London's economy, including in Camden, there are also negative impacts of tourism which need to be managed. More hotels in outer London is an important step, however, the majority of coach trips are to key attractions in the centre. The size of coaches has increased in recent years, and the space needed to accommodate multiple, 15 metre long coaches in central London along with the impact on the wider street network should not be underestimated. Alternative travel options, particularly the river, should be promoted.

Coaches also impact on residential streets, both as a result of routing through some sensitive areas, as well as using residential car parking for dropping off and picking up. Impact of coaches on residents' amenity has been highlighted as a particular and growing concern, including disturbance from noise. We understand that London Councils is currently reviewing the London Lorry Control (LCC) scheme which looks at out-of-hours routings which Camden will contribute to - coaches need to be part of this scheme. While the Mayor also wants to consider out-of-hours deliveries these need to be managed for similar reasons.

Public Space

Camden welcomes the recognition of the importance of high standards in the built environment, good architecture and design and London's heritage assets, as well as the need for development to respect the distinct character of different parts of the city. Although set out in the consultation document in Part 4 under 'Public space', these are fundamental elements of 'good growth' and it is surprising that they are not therefore covered in Part 1. It is important that these matters are properly considered as a fundamental part of good growth in the London Plan.

The importance of access to nature in improving health and wellbeing could have been recognised more fully in a City for all Londoners and should be emphasised in the London Plan and other Mayoral strategies and guidance documents. Current criteria for defining areas deficient in access to nature may no longer be appropriate and should be revised to support boroughs to develop better policies. Programmes such as The Green Gym and other forms of social prescribing should be emphasised as models for delivering many aspects of the vision for a city for all Londoners, tackling health inequalities, social isolation, community management of green spaces etc..

The initiatives outlined - new developments, green streets, SUDs etc. - all offer the potential to make London's natural environment more resilient by making space for nature in our built environment. Developments should be required to provide accessible green space or an experience of nature on site, to avoid pressure on existing green spaces. Opportunities for not only green, but biodiverse interventions should be sought.

The document recognises the multiple benefits of green infrastructure, and includes a commitment to protect green belt and other designated green spaces. To go further, the Mayor could recognise the importance of preserving and enhancing other non-designated areas green space.

New housing developments under the direction of the Homes for Londoners team should ensure accessible, inclusive, natural green space is integral in the design process, so that the increased pressure on green space is not just compensated for through payments to the Local Authority but is provided on site as much as possible. Projects under the direction of Homes for London should seek to set an example to developers and to boroughs.

The Campaign to Protect Rural England recorded a total loss of 'Open Space Land' in London of 215 hectares between 2009 and 2012. In addition to total open space, access to open space is an important factor, and there are inequalities in access that need to be addressed. Quality of open space is important. Every opportunity to increase access to and quality of green and open spaces should be encouraged, from small "pocket parks" to larger schemes on major developments.

The Inclusive Neighbourhoods principle should ensure that it considers the important integrating role played by green space and nature in and around developments.

Camden actively supports and programmes cultural events in the public realm, and welcomes initiatives to promote and engagement with the arts and encourage community cohesion.

Basements

We note that intention that the London Plan will include a policy on 'mega basements'. Camden has been at the forefront of the development of policies on basements recognising their potentially harmful impacts on neighbouring residents and properties, hydrology and ground condition. We adopted London's first development plan policy on basements, which we are currently further strengthening through our Local Plan review. We would note that all basements have the potential to cause harm, not just 'mega basements'; although high profile, 'mega basements' account for a small proportion of basement developments.

It is likely that all boroughs in which basements are a significant issue will have their own basements policy by the time the next London Plan is adopted and therefore a London Plan policy may not be necessary. If there is a policy in the London Plan on basements this should not in anyway undermine borough policies which take into account specific local circumstances. The term 'mega basements' would need to be clearly defined.

Part 5 - A City for all Londoners

We welcome the importance of social integration and equality of opportunity in this section and throughout the consultation document.

Camden is pleased to see the inclusion of sport in relation to bringing people together within and across communities. The role of culture should also be recognised since participatory arts activities have a long history of providing safe, non-threatening spaces for engagement, both for groups and individuals who may have no experience in connecting or engaging.

'Healthy London'

The Mayor's statement of ambition in A City for All Londoners is broadly welcomed by Camden and Islington Public Health.

On improving healthcare facilities (pages 28 and 73), both Camden and Islington Public Health and Camden's planning department have a history of working with the Clinical Commissioning Group and NHS England to address inequalities in access to

primary care in Camden. We have a good understanding of the barriers to finding new premises for primary care, often at short notice when a practice has to move. We also have an understanding of the barriers to co-locating services with primary care. We work hard to include primary care in our planning processes, and particularly our Council-led regeneration schemes. We welcome the Mayor taking clear leadership on this issue.

Whilst equity of access to healthcare for those who need it is an important issue, it is important to emphasise that the spatial environment holds sway over many of the wider determinants of health, which are included in A City for all Londoners. These include good quality affordable housing, education and employment, access to a range of services, opportunities for leisure and sport (including active travel), opportunities for social interaction, and air quality and noise, all of which facilitate prevention of poor physical and mental health. As Sir Michael Marmot eloquently said: “why treat people and send them back to the conditions that made them sick in the first place”.

The housing crisis leads to a number of important adverse effects, not only on both public and private sector workers who often cannot afford to live close to work. Where Londoners’ children can’t afford to live in London and move away, this can lead to elderly people having no family to support them, increasing reliance on paid carers. The consultation document alludes to parental support for home ownership, but support for parents to remain independent is an important issue.

Paid carers are reliant on living close to those that they care for, often relying on walking between clients. Others in low paid jobs such as retail and hospitality rely on living close to work, which provides a flexibility valued by them and their employers. We recognise that policies such as the “Hopper Fare” are likely to predominantly affect lower paid workers beneficially.

In addition to the range of factors requiring consideration of detailed environmental appraisal, it would be helpful to include “blue” space and public open space within the term ‘green space’, as the former has similar health benefits to green space and public open space is essential for social interaction. Additionally, public spaces cannot exist in isolation; they need to link with where people travel to and from to encourage walking and cycling to public spaces.

The arts and culture continue to have the potential to support positive mental health. Participating in arts and culture can encourage people to talk about mental health, particularly when done so as part of partnership collaborations between the arts/ cultural sectors and health professionals. To consistently do so requires that cultural spaces continue to be valued and nurtured.

Safer and more secure communities

Camden draws the Mayor’s attention to the recommendations of Lord Harris’ report, London’s Preparedness to respond to a Major Terrorist Incident (Oct 2016). In particular, Recommendation 2 – The Mayor of London should consult the London Boroughs and the Corporation of London on an alteration to the London Plan formally to identify the need for specialist emergency services worker housing as an important planning issue for London, and Recommendation 32 – Consideration

should also be given by the GLA and relevant local authorities to the wider installation of protective bollards in areas of vulnerability around London and to explore the case for retractable bollards in certain areas. In addition the Harris Report found that 54% of ambulance paramedics, police officers and firefighters live outside the capital, which could have a significant impact on delivering extra personnel during an incident. This highlights the importance of the cost of living and particularly housing for key workers.

Participation in culture

Camden views positively any increase in participatory arts and cultural activity, including those with a focus on NEET young people. The work of Central St Martins in prisons challenges youth violence, re-offending and explores training and apprenticeships for young offenders.

Camden is supportive of the Mayor of London's proposal to open up London's cultural institutions, however we would caution against overly high expectations. Within Camden's cultural institutions, there are numerous programmes and activities that are widely available however, with the reduction in arts across the curriculum, arts organisations have seen significant decreases in schools visits. Evidence shows that an interest in and engagement with culture is formed from childhood and with schools ceasing to see the value in accessing the capital's cultural offer, this behaviour is likely to be continued into adulthood. Many people fail to take up London's cultural offer due, in part, to 'threshold anxiety', 'it's not for me' or a sense that the work on offer is not of interest or relevance to them. These are behavioural patterns and will not be dispelled by simplistic approaches. Rather, work needs to take place that focuses on behavioural change and participatory engagement. It requires an increase in audience development with a specific focus on those who are least engaged. This requires staff within cultural organisations who are skilled at working with disadvantaged communities and have the required knowledge to re-interpret collections, produce programmes that engage and inspire and ensure welcoming visitor services. For arts and cultural institutions, this has an economic cost and with local authority cuts already having a massive impact, significant change may not be possible.

The London Borough of Camden welcomes the idea of a London Borough of Culture and would be open to more information.

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