Submission to the GLA in response to The London Plan consultation: February 2018

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- **Interdisciplinary**: bringing built environmental professionals together, inclusively along with others who share their concerns.
- **Open and creative**: working across all disciplines with competitors and collaborators.
- **Strategic in approach**: encouraging accessible and shared knowledge and seeking to connect place, practice, policy and research.
- **Visionary**: in identifying the issues and in promoting effective and urgent responses to both local and global challenges.
- **Professional**: developing a broad-based ethic of responsibility to social and environmental demands based on an equitable global framework.
- **Business-like:** furthering the skills and capacity of the UK construction industry to promote prosperity and deliver a better built environment.

The following proposed amendments respond to The London Plan: The Spatial Development strategy for Greater London Draft for Public Consultation published in December 2017. Numbering is as used in the original document.

Chapter 1 Planning London's Future

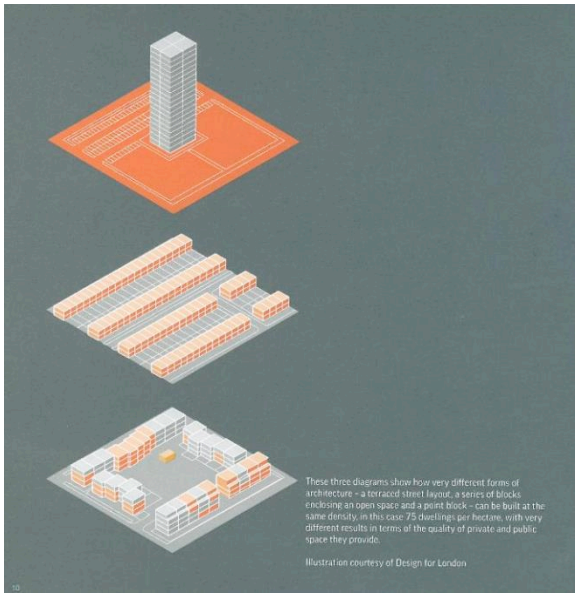
Policy GG1 Building strong and inclusive communities

Clause GG1-C. Add: **Ensure that trees and greenery are part of the planning.**

Policy GG2 Making the best use of land.

Clause GG2-B.

Note: Intensifying the use of the land is fine providing it is assembled into blocks that make tower blocks unnecessary as shown by Design for London Housing Guide. This is particular important at masterplan level.



Clause GG2-E. Add: **Encourage developments that are permeable (especially to pedestrians and cyclists), connected to the surrounding city and actively discourage gated or single entry communities**

Policy GG3 Providing a healthy city

Note: Good having healthy streets providing tall buildings do not induce wind effects that make walking and cycling very difficult.

Further Clause. Add: **All new proposed buildings over [say] 10 storeys must submit an environmental wind impact assessment.**

Note: This is to consider wind chill (as Fanger) and local gusting in addition to Lawson criteria currently used.

Policy GG4 Delivering the homes Londoners need

Note: It is important to combine land purchase at existing use value and not at the 'hope' value. There should be a development tax on the land value uplift at the point of sale. There should be a presumption in favour of community-led development.

Clause GG4-F. Add: **Introduce a mechanism for land value capture but in the meantime prevent right-to-buy for RSLs and Local Authority new builds.**

Clause GG4-G. Add: **Ensure that homes are provided with the supporting infrastructure, including local shops, cafes, schools, health centres, community and leisure facilities, workplaces, allotments, etc. within walking distance. Areas should not become solely residential.**

Note: The London Plan is far too quiet on the major issue of the existing stock which will be the vast majority of our buildings and our main energy demand in 2050. It is also the cause of so much health and wellbeing issues.

Clause GG4-H. Add: **Pilot street-wide zero-carbon retrofit schemes such as Energiesprong. Upgrading homes in fuel poverty is**

a) **socially good**
b) **starts to create the demand at scale needed for the cost reductions which makes it easier for the able-to-pay and**
c) **reduces demand on the NHS.**

Clause GG4-I. Add : **Create an additional land use classification for community-led/citizen sector housing.** Note : This would enable government to dispose of land more easily for community-led use and protect such land in the longer term by denying change of use.**Policy GG6 Increasing efficiency and resilience.**

Note: The introduction of a more ambitious MEES (minimum energy efficiency standards), with practical support for those affected, is imperative to achieving higher levels of retrofit.

Clause GG6-E. Add: **Introduce MEES for all developments, including retrofit. This should include a London specific uplift of the current minimum standards and a London specific maximum cost cap.**

The national standard is EPC E, London should ask for say EPC D with an enhanced PRS cap of £10k to reflect the locally higher costs and rental levels, inability of occupants to pay (higher living costs), and the need for a defined London-wide existing stock route-map to zero carbon for 2050

Clause GG6-F. Add: **All Part L applicable works in the existing buildings shall be enhanced by 35%. There are separate parts of Part L (1B & 2B) for refurbishment where the London 35% enhancement overlay would also be applied.**

Note: Delaying action will result in higher carbon emissions and therefore action

retrofit is critical to developing a mature supply chain, which ultimately will bring cost benefits.

Note: Given life after Grenfell, there is insufficient in the Plan about enabling occupant empowerment.

Clause GG6-G. Add: **Polices specific to Governance with citizen engagement with management of homes are required.**

Clause GG6-H. Add: **Development should include features that will assist in coping with changing climatic conditions and reduce various forms of pollution.**

*Note: These might include: street trees, urban greenery, SUDs, green and brown roofs, absorptive materials etc***.**

Chapter 2: Spatial Development Patterns

Policy SD1 Opportunity Areas

Clause SD1-B. Add: **Boroughs, through Development Plans and decisions, should:**

11) **Recognise that larger areas can define their own character and density. This particularly applies to riverside developments.**
12) **Must allow for the contribution of many different players including providers from a range of sectors and a diversity of scales, for example both large and small developers, multi-nationals and SMEs. Single company developments should be actively discouraged or only be permitted with strict planning conditions that require provision of diverse opportunities.**

Policy SD4 The Central Activities Zone (CAZ)

SD4. Add clause at O: **New developments in the CAZ should enhance the existing tight urban grain and stand-alone 'object' buildings within it should be actively discouraged. All buildings within the CAZ should where possible connect and make contact with their immediate neighbours.**

Policy SD8 Town centres: development principles and Development Plan Documents

Clause SD8-A.

Note: A town centres first approach is strongly supported (but this should not mean new clusters of tall buildings in these locations)

Clause SD8-B.4. Add after the first sentence: **This should not mean new clusters of tall buildings in these locations.**

Policy SD10 Strategic and local regeneration

Clause SD10-A. Add further sub-clause **(3): Seek to identify and support opportunities for include a wide range of contributors in their regeneration areas, development plans and Opportunity Area Planning Frameworks with the explicit aim of creating, maintaining and enhancing diverse communities.**

Chapter 3: Design

Note: Generally this chapter is very good, but the big issue is the design and management capability and capacity of the London Authorities and the boroughs to deliver it, monitor and maintain it all. Following Grenfell and Carillion there must be less reliance on the private sector to deliver this and the Mayor should be making working for London LAs popular again as in '50s and '60s with chief architects, chief planners and chief engineers in house with planning teams to make plans alongside the policies.

Fundamentally, planning officers have too little time and too little in-depth technical knowledge to make many of the judgements needed at pre-app stage and in support of planning committees. This also includes developments below the threshold for referral to the Mayor. Too much wasting time and money go on thick reports, which like Grenfell, have little meaning other than ticking a compliance process box (current policy asks for assessment but does not define any expectations of minimum deliverable performance standards – hence 50% of homes may fail the BRE daylight criteria – but policy was fulfilled because the BRE methodology was followed). This is the case for daylighting, sunlight amenity, overheating (dwellings and non-domestic), wind & microclimate, actual measured energy use and the performance gap, as well as fire performance, etc.

The new London Plan needs to bring in a very definite change, to enable harder-edged default numerical standards expectations for all of these such issues (just as it does for 35% better than Part L for energy compliance). This then allows more design review time to be spent on architecture, urban planning, and other less numerically defined aspects. Currently, of the very limited time available for design review, too much is side tracked onto these technical issues. Instead developers should provide written statements as part of the planning submission stating they will fully comply with all quantified minimum standards for all homes and other buildings. Then by exception developers must specifically draw attention to where, in exceptional site-specific situations, deviations occur and what mitigation measures are provided, drawing particular attention to planning officers and planning committees to the extent of these deviations.

Policy D1 London's form and characteristics

Clause D1-A6.

Note: Active frontages are fine but not every ground floor can be active. I always liked the Toronto City ordinance that prevented the use of blinds on the ground floor in the City centre to promote oversight and increase security (1990's or earlier, perhaps under the influence of Jane Jacobs)

Clause D1-A. Add subclause **(9): The affects of wind induced by building form and layout, both the force of the wind and noise, and of waste heat should be fully considered.**

Note: Currently the Lawson criteria for wind is a 1970s health and safety limit, not a proper comfort-based amenity standard and has proved insufficient for todays 'café culture' higher expectations for full use of public space. It does not take into account wind chill factor (Fanger based comfort) or local gusting.

Clause D1-B. Add subclause (at 4): **No demolition should be allowed of a building over 3 storeys unless a carbon account can demonstrate that the new building will have a lower whole life carbon footprint.**

Change to achieve high sustainability standards and low environmental impact, verified by monitoring in use performance.

Clause D1-B. Add (at 7): **Developments should positively contribute to the grain and connectedness of the locality. The continuous and connected character of London's streetscape should be encouraged and developments that seek to break this discouraged.**

Clause D1-B. Add (at 8): **Entrances (and multiple entrances) to buildings directly from 'the street' are strongly encouraged.**

Clause 3.1.10.

Note: 'Designing for adaptability' needs qualification. In the eyes of too many 'design for adaptability' means fully sealing all buildings and putting full air conditioning in - oversized to cope with the worst climate change scenarios. This is certainly not what is wanted because it adds to energy use, climate change and local heat rejection/UHI. Adaptability of use is sensible but appropriate (i.e. satisfying the full breadth of policies) adaptability for a warmer climate and unnecessary overheating should be essential. This should be illustrated with pictures from Marseilles of buildings with external shutters or as below, and using simple techniques like ceiling mounted fans learned from already warmer countries!

This building in Baldwin Terrace N1 is south-facing with siding shutters

Lessons from abroad: Ceiling mounted fans deliver as much as 3°C of cooling, are easy for occupants to understand and use and use less than 10% of energy of AC. Unfortunately, they are not an option in the standard software HVAC engineers use!

Policy D2 **Delivering good design**

Clause D2-C. Add: **All buildings above 30m high should be modelled for visual, environmental/microclimatic impacts and whole life carbon assessments at the pre-application stage.**

Clause D2-F. Add: **The tall building design review should include the submission of the whole life carbon assessment for each tower.** Insert **'....design review.... inform design options early in, and through, the planning process'**

Clause D2-H. Add (at 5): **requiring predictions of actual measured energy use and energy bills to be made available to occupants. This enables occupants, allowing them to question the performance gap and help bring the industry to account.**

Clause D2-H. Add (at 6): **requiring an ongoing management structure, which retains responsibility for every aspect of the building's performance during its lifetime.**

Policy D4 **Housing quality and standards**

Clause D4-D Private outside space. Add (at 11): **Secure, covered external storage with a minimum area of 2m2 and at least 1m2 per person should be provided for cycles etc. in a convenient location.**

Clause D4-D Private outside space. Add (at 12): **Provision should be made for secure and appropriately designed storage for deliveries etc. for periods when homes are unoccupied.**

Clause D4-E. Insert: **Dual aspect should mean facades on opposite sides of the building, not just a bay window or similar.**

Clause D4-E. Add: **A required methodology should be referenced here together with the minimum performance standard expected by using the methodology e.g. overheating mitigation will be provided in accordance with the CIBSE TM59 methodology.**

Clause D4-F. Add: **Fully glazed buildings will only be permitted if guaranteed in-use energy performance is provided in metrics that occupiers can understand.**

Note: The current lack of transparency of Part L method allows those using it to manipulate the compliance results – this is why we are still getting gas-guzzling all glass towers, overheating, increasing use of air-conditioning and an ever-

transparency is to ensure designers use metrics others can understand, ie: kWh metric. For example, occupiers and facility managers can use this compare this with their Smart Meter reading

Policy D6 Optimise housing density

Clause D6-A.

Note: The word 'Optimise' here is meaningless and bad English. Optimised against what criteria?
Reinsert at beginning of D6 Policy, from existing London Plan, including Table 3.2 Density Matrix
Revise suburban ranges in matrix as follows:

Setting Public Transport Accessibility Level (PTAL)

	0 to 1	**2 to 3**	**4 to 6**
Suburban	**150–200 hr/ha**	**180–350 hr/ha**	**200–450 hr/ha**
3.8–4.6 hr/unit	**35–55 u/ha**	**40–80 u/ha**	**45–115 u/ha**
3.1–3.7 hr/unit	**40–65 u/ha**	**50–115 u/ha**	**55–130 u/ha**
2.7–3.0 hr/unit	**50–75 u/ha**	**60–130 u/ha**	**70–185 u/ha**

The proposed increases relate to PTAL 2-3 and PTAL 4-6 and need to be subject to refinement.

Clause D6-C.

Insert after the first sentence : **This plan should include complieance with policies H5, H7 and H12 abnd all design standards, including internal and external space standards.**

Note : These amendments would reinsert the density matrix as a basis for ensuring that new developments met the principles of Sustainable Residential Quality. The matrix is amended to support intensification of suburban areas with Public transport Access of at least PAL 2. The new policies for design scrutiny are retained, but to supplements rather than replace pre-existing density policy. The content of management plans for higher density schemes scrutiny are clarified as is the requirement for higher density schemes to be fully compliant with policy requirements on design as well as affordable housing and bedroom size mix.

Policy D7 Public realm

Clause D7-F.

Note: Policy of 'Consideration should also be given to the local microclimate created by buildings' is not delivering to good enough standards. For example, requiring wind 'assessments' (Lawson criteria) does not consider wind chill factors of as much as 6°C or local gusting.

Clause D7-H. Add: **Proposals for the maintenance and governance of planting schemes should be submitted as part of the planning application.**

Policy D8 Tall Buildings

Clause D8-C. Add after the second sentence: **The further 455 consented towers which have not yet been built should be re called and reviewed by the mayor and reviewed for their 'good use of land', their impact on the existing communities and their whole life carbon balance.**

Clause D8-C.1 Visual impacts Add subclause at b): **They should not reduce the**

Clause D8-C.1 Visual impacts. Add subclause at c): **The developer must demonstrate the governance measures that will guarantee this. This should include the provision of a 'sinking fund' to ensure long-term maintenance and, in due course, replacement of significant components like cladding. The UK demolished so many towers in the recent past because the maintenance budget and revenue stream (from occupants) was insufficient.**

Clause D8-C.1 Visual impacts. Add subclause at g): Nor should they cast shadows that significantly adversely affect other buildings or the public realm.
Clause D8-C.1 Visual impacts. Add subclause at h): **The base of all new and extensively refurbished tall buildings should be designed so that it contributes to the streetscape, provides active frontages and connects with its context and environment.**

Clause D8-C.1 Visual impacts. Add subclause at i): **Appropriate long term mechanisms must be established and demonstrated to ensure that tall buildings will be well-maintained and regularly upgraded for the duration of the their design life.**

Clause D8-C.1 Visual impacts. Add subclause at j): **All tall buildings proposals should be submitted with a statement that describes the preparations that will put in place and the measures to be taken when tall buildings reach the end of their design life.**

Clause D8-C.2 Functional impact. Add subclause at a): **Buildings should not have a larger whole life carbon balance, per useable square metre, than a lower building would have.**

Clause D8-C.3 Environmental impact

Note: The assessment of these and the minimum standards are not well defined. For example, requiring wind 'assessments' (Lawson criteria) does not consider wind chill factors of as much as 6°C or local gusting.

Clause D8-C.3 Environmental impact. Add subclause at c): **Noise created by air...should not detract... for open spaces... and balconies and other amenity spaces**

Policy D10 Safety, security and resilience to emergency

Clause D10-C. Add: **Developments dependant on sealed façades and also air-conditioning shall submit an assessment of how long they will be able to operate and maintain acceptable and safe conditions for occupancy during an electrical power failure.**

Note: This builds on the New York experience and as an example see LEED assessment method BD+C New Construction v3 2009 Passive Survivability and Functionality During Emergencies

Chapter 4: Housing

Policy H1 Increasing housing supply

Clause H1-B.2 d) Add after 'public sector owned sites': **not including woodland, parks and open spaces.**

Policy H2 Small sites

Clause H2-I. Add: **Large developments should include provisions for multiple small site developments within them aimed at both small developers and, where possible and appropriate, individual builders/householders.**

Policy H5 Delivering affordable housing

Clause H5-A. Amend **50% strategic target to 65%.**

3) Amend **50% to 65%.**

4) Amend **50% to 65%.**

5) Amend **60% to 65%.**

Note. This rebases the affordable housing targets on the evidence base as in the Strategic Housing Market Assessment. It also reinserts strategic guidance on the setting of affordable housing by boroughs in their local Plans which has been omitted from the plan draft. This reinsertion is critical as otherwise boroughs may set their own affordable housing targets too low, which would put at risk the delivery of the London-wide strategic target.

Policy H6 Threshold approach to applications

Clause H6-B

1) Amend **35% to 50%.**

2) Amend **50% to 65%.**

3) Amend **50% to 65%.**

Delete : **the 35% threshold will be reviewed…. Supplementary planning Guidance.**

Clause H6-C

3) Insert : **including, including internal and external space standards and other design standards.**

4) Amend targets to reflect above amendments.

Note. This would bring the viability threshold into line with the overall affordable hosing targets and ensure that schemes were only considered under the 'fast track' if they were fully compliant with the relevant London Plan policies. It would ensure that developers did not fast track schemes which were primarily

Policy H7 Affordable housing tenure

Clause H7-A

1) Replace **30% low cost rented homes with 70%.**

2) Delete this clause.

Policy H12 Housing size mix

Insert new policy : **At least 30% of a new development should be units with at least 3 bedrooms. unless the local planning authority determines that a specific site is unsuitable for residential accommodation for households with children.**

9) Delete this policy. *Note : Boroughs should not set prescriptive dwelling size mix requirements for tenures other than social rent. This reintroduces a London-wide target for family sized homes, based on the SHMA evidence base, while leaving some flexibility on its application to avoid the provision of family housing on unsuitable sites, and the division between tenures. Boroughs should be able to set local housing size mix requirements by tenure, which are based on evidence and local priorities.*

Chapter 6 Economy

Policy E1 Offices

Clause E1-G.

Note: Alternatives to the conventional BCO institutional standards shall be considered. The opportunities offered by new smart IT and new working styles to reduce significantly small power, lighting and hence air-conditioning and occupational costs. New tablet-based IT offers the opportunity for small power of less than 5W/m2 (USB power-draw is typically 2A at 5v), LED task lighting can be less than 1W/m2, both more than 80% savings on BCO standards. This offers the potential for far more office type buildings to become naturally ventilated and hence typically half the energy use of air-conditioning (ref ECON19).

Chapter 8: Green Infrastructure and Natural Environment

Policy G1 Green infrastructure

Clause G1-D. Add: **The network of green spaces, street trees, green roofs and other major assets such as natural or semi-natural drainage features must be planned, designed and managed in a more integrated way to meet multiple objectives including: promoting mental and physical health and wellbeing; supporting learning and development in children and adults, adapting to the impacts of climate change; improving air and water quality; encouraging walking and cycling; and conserving and enhancing biodiversity and ecological resilience alongside more traditional functions of green space such as play, sport and recreation.**

Policy G2 London's Green Belt

Note: The continued protection of London's Green Belt is strongly supported.

Policy G3 Metropolitan Open Land

Note: The continued protection of MOL is strongly supported.

Policy G4 Local green and open space

Note: The continued protection of London's local green and open space is strongly supported.

Policy G5 Urban greening

Clause G5-A. Add (at the end of A): **Proposals must include governance and maintenance plans at the time of submitting for planning consent.**

Clause G5-B. Add (after 'local cirmcumstances'): **provided green space is provided on site or within close proximity.** Replace 'target score' with '**as a minimum acceptable score**'.

Clause G5-B.

Note: The new Urban Greening Factor (UGF) is a flawed metric for dense urban areas as it does not incentive the three-dimensional potential of vegetation and particularly the urban tree canopy benefits advocated in support of other policies. For example, trees provide almost six times the leaf area of lawns but are rated the same in UGF. Leaf area, evaporate cooling effects and microclimate effects are so much greater for trees. A simpler alternative is the Singapore Leaf Area Factor, which has a proven track record having been in use for more than 10 years.

Clause G5. Add clause (at C): **A target of two trees per resident (or worker) is recommended for all boroughs and neighbourhoods.**

Policy G6 Biodiversity and access to nature

Clause G6-A. Add: **including Sites of Metropolitan Importance and all ancient woodlands.**

Policy G7 Trees and woodlands

Clause G7-A. Strengthen as follows: **Trees and woodlands should be protected, and new trees and woodlands should be planted in appropriate locations in order to increase the extent of London's urban forest – the area of London under the canopy of trees to ensure minimum canopy cover levels over the whole Greater London area of 20%. The strongest possible protection should be given to 'veteran' trees and ancient woodland, especially where these are not already part of a protected site.**

Chapter 9 Sustainable Infrastructure

Policy SI1 Improving air quality

Note: The London Plan with its time horizon of 2041 gives no longer-term trajectory for air quality aspects and hence does not help industry with a view of where to make long term investments in products and services. For example,

such a major pollution source. Likewise, waste heat is already limited as a pollutant for discharges into water courses and into the groundwater (ref: Environment Agency), and so given the number of summertime excess deaths there is ground for establishing a trajectory for limiting waste heat discharges. The latter would then help the long term future of district heating as it evolves in to low temperature networks, accepting waste heat from commercial chillers and providing the heat source for domestic hot water using heat-pumps.

Policy SI2 Minimising greenhouse gas emissions

Note: The Zero Carbon policy for new buildings is currently flawed because:

1. *It does not do what is on the label and will not deliver zero carbon emissions from energy consumption in these buildings*
2. *It excludes the significant 'unregulated' energy use of buildings*
3. *The calculation incentivises oversized and operationally inefficient 'regulated' energy systems sized on inflated 'unregulated' energy use.*
4. *There is no responsibility of those doing carbon prediction compliance to deliver a building that actually performs to these standards.*
5. *End users cannot check their building performance against predictions because carbon metrics are not transparent compared with kWh meter readings*
6. *Policy SI-2 A is incorrectly worded. Zero Carbon as currently defined, does not include emissions from construction or peak energy demands.*

Clause SI2-A. Amend to read: **Major development should be net zero-carbon for in-use energy consumption. In addition, they should reduce carbon dioxide emissions from construction and minimising both annual and peak energy demand in accordance with the following energy hierarchy:**

1) **Be lean: use less energy and manage demand during construction and operation.**
2) **Be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly. Development in Heat Network Priority Areas should follow the heating hierarchy in Policy SI3 Energy infrastructure. (omit this as already covered at policy level by SI-3)**
3) **Be green: generate, store and use renewable energy on-site.**
4) **Be Seen: transparency of targets and actual monitored performance**

This policy will be progressively updated during this Plan period to include 'unregulated' energy carbon emissions and embodied carbon emissions within the definition of zero-carbon.

Clause SI2-B. Amend to read: **Major development should include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy and energy performance of the operating building will be monitored and reported.**

Clause SI2-C. Add: **Where the monitored performance of the building falls short of the predicted performance upon which the offset was based, further offsets equivalent to the monitored shortfall shall be provided.**

Clause SI2-E. Add: **Referable Schemes should undertake a nationally recognised lifecycle carbon assessment.**

Policy SI3 **Energy infrastructure**

Note: To avoid lock-in to fossil fuel and combustion emissions, all energy masterplans should have a planned evolution to a zero carbon and zero combustion 2050.

Clause SI3-B6. Amend: **how the heat network evolves to zero fossil energy sources and zero combustion by 2030.**

Clause SI3-D. Add: ... **should have a communal heating system unless they can demonstrate lower energy use and carbon emission by alternative means**.

This reinforces that demand reduction is the highest priority in the energy hierarchy and allows innovation where higher levels of energy efficiency are offered. For example: home 'heat autonomy' is within close reach for modern high density apartments if there is enhanced insulation – i.e. individual home exhaust-air heat-pumps can deliver both heating and hot water, without needing the cost, complexity and standing losses of a communal system.

Policy SI4 **Managing heat risk**

Note: Learning from warmer climates abroad, the cooling hierarchy should specifically mention ceiling mounted fans as enhanced passive ventilation, before consideration of mechanical ventilation or active cooling systems. Ceiling fans can deliver 3°C of cooling at less than 10% of the energy use of mechanical systems. They also cost less and occupants more easily understand how to control and use them only when required. Unfortunately, standard HVAC engineer software and training in the UK does not have this as a cooling option!

Policy SI5 **Water infrastructure**

Note: Just as London requires an extra energy overlay (35% better than Part L) because it would not economically discourage development, we should be expecting higher domestic water standards. In modern high-density apartments, hot water is now becoming the biggest energy demand. It is also, by far, the largest peak heat demand and hence dictating the size of heat network pipes. 80 litres maximum per person was easily achievable under the Code for Sustainable Home and so should be used for London. It has now become easier because the EU has just agreed a new water labelling system for shower heads (& other water outlets) – which tend to be the largest hot water demand in a home.

Clause SI5-C.1. Amend: **105 litres to 80 litres.**

Policy SI13 **Sustainable drainage**

Note: There is no explanation that SUDS is the responsibility of all of us, including those outside flood risk areas. We are all in the catchment areas that feed into the flood risk areas.

Chapter 12 **Monitoring**

Policy MI **Monitoring**

Table 12.1 Key performance indicators and measures :

Reinstate KPI 2 From existing London Plan. Optimise the Density of residential Development: Over 95 per cent of development to comply with the housing density location and the density matrix.

Note. This will ensure continued monitoring of density compliance and identify the proportion of new developments, which are either below or above the appropriate density ranges. The Mayor should continue to publish maps of density compliance and identify specific non- compliant schemes, and the justification for approving or supporting schemes outside the appropriate ranges.

Effective monitoring and housing and planning policy making require a step change in the availability of data (most of which probably exists) covering, at Borough or finer gran level, losses of housing units from each tenure and rental band as well as new production. This is essential to give an adequate view of how the stock is changing through the sale of council housing under Right to Buy, redevelopment, conversion between rental bands and otherwise.

The Edge 20 February 2018