To

Sadiq Khan (Mayor of London)
New London Plan
GLA City Hall
London Plan Team
Post Point 18
FREEPOST RTJC-XBZZ-GJKZ
London SE1 2AA

1st March 2018

New Draft London Plan: Response to Consultation on 2017 Draft Plan (Revised):

Dear Mayor Kahn,

As part of our contribution to the consultation on your draft new **London Plan** (The Spatial Development Strategy for Greater London), Expedition Engineering and Useful Studio hereby provide a summary of our thoughts on specific parts of the draft plan as set out in the attached pages.

We would be happy to participate in any follow up meetings or organised sessions to help inform the finalised version of the new London Plan.

Please do not hesitate to contact us should you have any queries on our comments.

Regards

Alistair Lenczner

Director Expedition Engineering and on behalf of Useful Studio

(Note: This document has also been emailed to LondonPlan@london.gov.uk and submitted via consultation website: www.london.gov.uk/new-london-plan)

Response to draft New London Plan consultation

This document provides a combined **Expedition Engineering** and **Useful Studio** response to the draft plan published in December 2017.

Expedition Engineering and Useful Studio are both part of the Useful Simple Trust, an Employee Benefit Trust based in London.

http://www.usefulsimple.co.uk/

Responses to the draft London Plan are made to the respective numbered sections indicated on the following pages.

Chapter 2 Spatial Development Patterns

Policy SD2 Collaboration in the Wider South East

- We think it is important that London develops a formal collaboration with the Wider South East (WSE) region that surrounds it.

- The effective extent of London's socio-economic area reaches well beyond the boundaries of Greater London and so it is logical that the planning of London should consider how it's plans work within the WSE.

- Consideration should be given to establishing an agency that considers the planning of infrastructure and development the combined GLA and WSE region. This would be similar to the "Ile de France" Region in France which includes all the socio-economic infrastructure that is intrinsically related to Paris.

- Transport for London (TfL) should seek to establish formal working relations with the recently announced Transport for the South East (TfSE) to develop a joint TfL/TfSE plan that will respond to the needs of both areas as a co-ordinated plan that avoids discontinuity of infrastructure or unnecessary gaps/duplication of proposals.

- Consideration should be given to widening the scope of this policy and/or supporting text to collaborate with the West Midlands Combined Authority (Birmingham City and Solihull) and other locations along the HS2 line reflecting transport connectivity and resultant economic benefits and the role in meeting housing need.

Policy SD3 Growth locations in the Wider South East and beyond

- A strong emphasis should be given to ensuring that any significant size new growth locations in the WSE are supported by a transport plan that allows growth to be achieved without reliance on private cars.

Chapter 3 Design

Policy D2 Delivering good design

- Whilst an emphasis on the importance of good design is to be welcomed, what is considered to constitute good design should be made as explicit as reasonably possible without being over-prescriptive in terms of what the final design might look like.

- More detailed design submitted at planning stage should be encouraged so that development intentions are made as clear as possible. It is recommended that the level of information required for application should be agreed by the planning authority during pre-application discussions and/or with design review panels.

- Particularly welcome the recognition that design quality can be compromised following planning consent and measures to address this

- In addition to the design retention methods proposed perhaps a design monitoring system is required, to ensure developments are being delivered in accordance with the permitted scheme, with stricter enforcement penalties for deviations

Policy D4 Housing quality and standards

- Minimum housing standards for 'typical' dwellings as a means of supporting housing quality are to be welcomed. However, it is recommended that some flexibility be allowed in recognition that designers can develop innovative new ideas for creating compact (micro) homes that are suitable for emerging types of community lifestyles (e.g. co-housing, live/work units).

- It is recommended that stronger wording is used to prevent single aspect dwellings, especially north-facing single aspect dwellings. Such thinking is suggested in the supporting text, but not included within the main policy wording.

- Minimum areas and dimensions for bedrooms are welcomed, however the loss of similar standards for kitchen/living/dining spaces combined with the overall minimum GIA risks inefficient and/or less flexible apartment layouts dominated by circulation rather than well-proportioned habitable rooms. We would therefore recommend minimum areas and key dimensions for living spaces are included.

- Space requirements for storing dry recyclables can have significant impact on efficiencies of high density development. To provide developers with certainty with what is required, further information should be provided either in the London Plan or an SPG for the size of space required or reference could be made to the need for proposals to accord with LWARB guidance.

Policy D6 Optimising housing density

- Removal of the fixed density matrix recognises that optimal density is a complex issue, this recognition is welcome. However, part C of policy D6 suggests that up to and above a certain density the design quality will be under less scrutiny than if below this threshold. This seems to counteract the removal of the density matrix.

- Design quality is important for all schemes – at higher densities to ensure housing standards and quality are not compromised by over development, but equally lower densities schemes should be scrutinised to ensure they are making the best use of land, central to good growth

- We support a 'design-led approach' to optimising density, but would encourage stronger wording to ensure development, particularly higher density development, is well designed to maintain high-quality, healthy spaces for Londoners.

- We welcome a requirement for applications to submit a variety of density measures

- We suggest density guidelines are provided to support/illustrate examples of optimum density in relation to site context, transport and infrastructure

Policy D7 Public realm

- Consideration should be given to making reference to public realm materials with regard to quality, sustainability and where appropriate permeability.

Policy D8 Tall buildings

- The need to provide clear information for the location and definition of tall buildings is welcome and the definitions of tall buildings within Opportunity Areas should relate to the evolving context set out in paragraph 3.8.2. These areas are very sensitive and the way local communities and wider stakeholder groups across London are engaged and the information provided including views and impacts should be further considered so that the full impact is properly understood. Design quality should form part of the approach.

Policy D13 Noise

- The policy would benefit from being broadened out to also cover vibration. As with air quality (Policy SI1), policy D13 should require developments to submit Noise (and Vibration if included) Impact Assessments for all major developments of developments where the location is likely to be particularly sensitive to noise, that demonstrate compliance with this policy.

Chapter 4 Housing

Policy H1 Increasing Housing Supply

- The new draft London Plan sets new targets for homes across many developments but it is unclear on what basis these targets are set and whether the impact on quality has been considered or if there is capacity in the market to meet those numbers.

- The attainment of this target will be reliant on the timely delivery of a number of development sites. Many sites will need strategic infrastructure funding etc. to be brought forward early. It is unclear if that funding is available.

- Many of the opportunity areas for example are very complex and will require significant large-scale and costly infrastructure to allow the timely delivery of regeneration.

- Conflicts over sites like the Crossrail depot at Old Oak which were earmarked for development and are no doubt repeated elsewhere will put additional strain on the ability of the market to deliver.

- In light of the above, the GLA should work with all major opportunity areas to agree appropriate targets, and support detailed assessments including impact on place making.

Policy H6 Threshold approach to applications

- The 50% affordable housing target is welcome but its impact on S106 and funding for other good growth ambitions is unclear.

- To meet the affordable target it is likely significant additional public sector investment will be needed but it is unclear if this will be available and therefore whether the targets are compatible with the resources available.

- On privately owned brownfield sites cost of clean up etc. will add additional pressure and could impact further on quality. Further work should perhaps be done to understand the viability on the more difficult and contaminated sites with infrastructure support being targeted as needed.

- Affordable housing tenure is similarly important and challenging. The presumption that of the 70% of the affordable homes should be social rent/london affordable rent places further challenges on viability but is welcome as it represents real need. The impact of mix on community diversity should be considered and may be problematic in some areas.

Policy H12 Housing size mix

- This policy is quite restrictive. Some housing typologies that meet a specific housing need such as discounted Pocket Living schemes for first-time buyers and Extra-care housing for older people will be primarily consist of only one bedroom units, something that this policy is seeking to prevent.

Chapter 8 Green Infrastructure and Natural Environment

Policy G1 Green infrastructure

- The majority of development in London over the Plan period is expected in largescale developments/opportunity areas, but the policies focus heavily on the protection of existing assets rather than the need to deliver new green infrastructure. Policy wording across the chapter should make stronger references to the need for new green infrastructure in opportunity areas and the importance of this expanding London's natural environment.

Policy G2 London's Green Belt

- Whilst we support the London Plan's commitment to protecting valuable Green Belt areas, The London Plan should recognize that many parts of land that is currently designated part of the Green Belt does not have the attributes that make it suitably qualified to meet the original purpose of the Green Belt areas. A review should be carried out to identify which parts of the Green Belt land might be reclassified (e.g. areas which are low-quality scrub land, industrial or of low "Green Belt" amenity value). A reclassification of parts of the Green Belt might present significant opportunities for new developments to help meet London's growing housing and economic development needs.

Policy G4 Local green and open space

- The policy states that Boroughs should undertake needs assessments. Clearer guidance on how this should be assessed would be helpful with clarity about provision.
- The role and function of civic space as part of open space provision should be more clearly defined. Such spaces play a particularly key role in Opportunity Areas where they act as meeting places, spaces for events, and support the function of transport hubs.
- The definitions in the glossary don't fully cover the terminology used in policy. "Publicly accessible" is used in policy but not defined. It's important that this is defined given the fact that much of the new public open space to be provided in London will be in private ownership/management. Also, it's not made clear enough if "Local Green and Open Space" covers civic spaces and areas of hard landscaping. The glossary definition for Open Space indicates that it does, but the policy and supporting text indicates that its refers to just green spaces.

Policy G5 Urban greening

- The UGF tool is fairly high level and may need refining. It is important that developers show early on how they will meet targets by specifying the area set aside for urban greening, soil depth, SUDS capability and connections to strategic SUDS and by defining how schemes contribute to other functional requirements.

Policy G6 Biodiversity and access to nature

- On major sites, especially brownfield sites or sites with rail and other sidings there will be pockets of biodiversity that are likely to be impacted. In areas of large-scale development such as in Opportunity Areas, Local Planning Authorities should review the biodiversity across their area as part of early surveys and establish a strategy (possibly as part of a masterplanning and capacity assessment process) for enhancing the biodiversity and preserving where possible existing habitat as part of a multi-functional approach to green infrastructure and urban greening. Net positive is a good ambition. How one measures net positive however should be clearly defined.

Policy G8 Food growing

- The Supporting text could refer to the potential for industrial roof space providing commercial food growing opportunities and could refer to potential for food growing on roofs generally and integrating food growing into open space within developments.

Chapter 9 Sustainable Infrastructure

Policy SI1 Improving air quality

- The draft London Plan would benefit from providing clearer guidance and definitions of 'air quality positive'. In opportunity areas where new populations are being introduce often on brownfield land with existing sources of pollution it would be helpful to understand more clearly how air quality positive is measured.

Policy SI2 Minimising greenhouse gas emissions

- We very much support the inclusion of targets to reduction in energy consumption through efficiency measures SI2. This removes the perverse incentive of the previous hierarchy to slip straight to energy efficient supply. The inclusion of post occupancy monitoring is also welcomed. However, the requirement is lost in the production of an energy strategy and recommend that this is split out into its own section (at the level of A/B/C) so the ambition is not lost. (SI2)

- To require major development to be net zero carbon.

- For all major development to adopt new efficiency measures such that residential development should be 10% better than Part L from energy saving alone and commercial development should be 15% better.

- The requirement to establish a carbon off-set fund to receive developer payments for carbon emissions and the recommendation that the price of carbon should be set at £95 tonne with a review every 3-5 years. However that the cost to off-set carbon is likely to be lower than the cost to install on-site renewables and may therefore result in a reduction in on-site renewables. This may undermine the move in the draft plan to promote on-site electricity and heat production from solar (PV and thermal).

- Monitor and report on energy performance for at least 5 years via an online GLA portal. Detailed guidance on how energy use should be measured including how to assess, meter, capture, display, use and store data and data sharing protocols should be provided to support LPAs, other bodies and developers to ensure there is consistency and to minimise costs associated with establishing monitoring protocols.

- Model overheating. Further guidance on acceptable standards and solutions particularly in tall buildings would be helpful

- Energy strategies to demonstrate how the development will meet zero carbon on site emissions by 2050 (no allowance for off-setting). Further detailed guidance on what this means in practice and how development can demonstrate that it will meet zero carbon.

Policy SI3 Energy infrastructure

- We wholly support the demotion of CHP systems for new developments and have long questioned their suitability as a low carbon energy source. We would encourage the mayor to go further to completely remove the obligation to explore CHP for new developments. Passive design standards substantially remove the need for space heating in new developments. With decarbonisation of the grid, our research shows that heat pump solutions already outperform gas fired CHP in carbon terms as illustrated (see attached). This relative performance will only get worse as the grid decarbonises, and combined with air quality concerns, we believe that CHP is not the right solution for London. We recommend that the Mayor reviews current consented schemes for CHP and ensures that clear mechanisms are in place to enable them to be replaced with Heat Pump Technologies. We recognise the wider scale concerns with a switch to heat pumps on the capacity of the grid, but new developments comprise a small proportion of the housing stock that we do not believe this is a barrier for this policy. Our research also shows that for new build schemes, a district heat network supplied by heat pumps provides little benefit over block scale/distributed heat pumps solutions and yet has significant additional costs and risks associated with installation. We would therefore question the promotion of heat networks in the context where no major heat supply can be identified. (S13)

- Welcome adoption of the revised energy hierarchy and the requirement for major developments to have energy strategies.

Policy SI4 Managing heat risk

- Welcomes the emphasis in the policy to consider the impact of development on the micro climate because of the Urban Heat Island effect. It would be helpful if the policy could provide more guidance on how to assess the impact from development and how to factor in future impacts of climate change. Further, it would be helpful if climate adaptation standards could be set out in the policy as well as guidance on measures to mitigate those impacts including how to assess orientation, layout, choice of materials etc. Provision of guidance would help to address confusion and potential areas of dispute with developers and ensure there is consistency in the way this is addressed across London.

Policy SI7 Reducing waste and supporting the circular economy

- We welcome the Mayor's reinforcement of the Circular Economy. However, Figure 3.1 is very confusing in this context. It is not a hierarchy of approaches as the essence of designing for the circular economy is taking a lifecycle approach based on the life of building components. Moreover, the circular economy is about finding new business models and working with the end of life chain as much as the supply chain.

- Welcomes the policy for referable applications to promote circular economy outcomes and aim to be net zero waste. Further guidance and standards setting out how the circular economy should be integrated into development would be helpful.

Chapter 10 Transport

Policy T1 Strategic approach to transport

- The London Plan needs to include a specific plan for how London's transport systems can be planned with a 30 to 50-year horizon. If London's transport infrastructure is to be able to provide the capacity and connectivity that its people and economy will want as its population continues to grow, if is likely that the rate with which new infrastructure projects are delivered will need to significantly accelerate if chronic congestion is to be avoided. London's transport plan should envisage where brand new urban rail lines could be planned to relieve existing lines. Beyond the lines already planned such as Crossrail 2 and the Bakerloo line extension, the London plan should identify where lines could be introduced to allow fast (Intercity) cross city passenger and goods movement. A new London rail "bypass" that does the railway equivalent of the M25 would help relieve London of passenger and goods journeys that does not start or finish in the capital.

- We welcome the objective of increasing active and public transport modes to 80% (T1) and the Healthy Streets Initiative (T2). However, we believe that the mayor could go further to prioritise pedestrians and cyclists in town centre areas and creates hierarchy that puts people first. Otherwise pedestrian and cycling access is seen as an add on to the street. We need to flip our attentions to purposely design streets for people before cars. This is a subtle yet important recommendation for the language and emphasis of this policy.

Policy T3 Transport capacity, connectivity and safeguarding

- See response to Policy T1 above.

Policy T7 Freight and servicing

- The London Plan needs to include more radical ideas more how the city responds to the evolving needs for moving freight across the city and allow for goods deliveries to be made.

- TfL should work with Transport for the South East (TfSE) to explore ideas to plan a new London Orbital railway that allows goods to be moved around London by rail as so avoid having to compete with TfL passenger traffic on London's already congested rail network.

- TfL should explore ideas whereby goods can be delivered into the Central London Area at night using the new Elizabeth Line and the planned Crossrail 2 line. This would make good use of rail infrastructure that will already exit but have spare capacity at night.

Policy T8 Aviation

- We note the principle of no expansion of Heathrow without reduction of noise and environmental impact. We would advocate that this is applied not only to Heathrow but to all of London's Airports particularly in the context of the London Airspace Management Plan 2 which will enable growth by reviewing all routes on the back of the introduction of Performance Based Navigation.

- TfL should work with TfSE to explore ideas to allow direct access to both Heathrow and Gatwick airports for people located north and west of London without having to pass via central London. This would help avoid congestion caused by mixing airport traffic and commuter traffic on London's existing rail network.