Draft London Plan

Project: **Draft London Plan Levitt Bernstein Consultation Response**
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General Comments

Size, complexity and repetition

The purpose of the document is clearly explained and the six overarching Good Growth policy headings provide a strong, clear start. But this is a huge document. Despite the many calls for it to be substantially shorter than the current plan, it is instead, longer. Just reading it is a daunting task, impossible in one, or even two, sittings. To achieve a full understanding of the contents, and become familiar with them, will require many further readings.

We fear that its size and complexity will be off-putting to the many Londoners who are not built environment specialists, but have a keen interest in London's future development. Anyone seeking to understand what is planned for their area, what developers and/or their neighbours can, and cannot, do, or what their housing options and prospects are, will find it difficult.

This is a pity because the current Mayoral team has worked extremely hard to be inclusive in its work to date. Many professionals will also find it challenging and we are concerned that it will be only be used when necessary to justify an approach, rather than used routinely so that the strategic spatial priorities become embedded in our thinking.

While we understand that policies need to be justified, the text is unnecessarily long and repetitive. Many of the overarching principles are self-explanatory and require little, if any, justification. Moreover, they need not be repeated. For example, inclusive design is a broad and familiar concept that only needs to be defined once. As it is the first of the Good Growth policies, we question whether it needs to appear again in every chapter and in numerous policies.

The policies

The policies are the most-used and are arguably the most important elements of the London Plan. The large number of policies is a concern in itself but they are also complicated in structure. The referencing protocol needed to cope with this multi-layering is cumbersome (e.g. D6 A 1).

A number of policies comprise a mix of targets/ambitions (which are not expected to be met in full), vague recommendations (which are difficult to assess) and specific requirements (some of which are too detailed for a strategic document).

We provide some examples below:

Policy GG4 A is one of many policies that include a very loose requirement:

'*Ensure that more homes are delivered*'

Policy D4 Paragraph 3 'Housing Quality and Standards' reads as follows:

'*Qualitative aspects of a development are key to ensuring successful sustainable housing and should be fully considered in the design of any housing developments*'.

Both are so obvious that they need not be stated. The wording is too loose and subjective to assess with any degree of rigour and consistency, which means they are likely to be ignored, or contested and lead to protracted negotiation.

D4 then goes to the other extreme by reproducing the full detail of the Nationally Described Space Standard (NDSS). This is a government-owned standard that may change or be withdrawn in the lifetime of the Plan, and is an inappropriate level of detail for a strategic document. (It also breaches the March 2015 Ministerial Statement by changing the minimum ceiling height from 2.3m (in the NDSS) to 2.5m. Having said that, we agree that 2.3m is too low and urge the GLA to work with the government to get this changed).

Policy H5 'Delivering affordable housing' begins as follows:

'The strategic target is for 50 per cent of all new homes delivered across London to be affordable'.

Without significant subsidy, the majority of developments will not exceed the minimum requirement of 35% affordable. While 50% is the strategic target, the reality is that it will not be met routinely. This calls into question whether it should be expressed as a policy at all.

Designers are often required by client's briefs or appointments to confirm that all London Plan Policies have been met. As it stands, we would need to provide numerous caveats and qualifications before confirming compliance. This would be time-consuming for all concerned.

Overall, and despite its length (or perhaps because of it) the Plan lacks clarity and weight. We are also conscious of the fact that it will be supported by many other documents, most of which, we, and other designers, will need to digest and reflect in our work. Taken together, the suite of documents is likely to run to thousands of pages. Many of the documents will also refer to other external publications.

We also have to understand and comply with the Building Regulations, and increasingly need to deal with aspects of regulation during the design stage to avoid being caught out later. There is a danger that the time it takes to read this material, and achieve and demonstrate compliance, will leave too little time for the creative process itself.

Suggestions

A simpler and more concise approach

We would like to see a much shorter, more readable document with fewer policies. Generally this does not mean lower ambitions, but more succinct and meaningful requirements. Ideally, we would like a document with a maximum of 100 pages of main body text, and 25-30 policies.

Avoiding repetition and loose, or over-obvious, statements would go some way to achieving this end. Relocating some of the detail, either to appendices or to supplementary guidance should also be considered. For example, the detail on Opportunity Areas and Town Centres, in Chapter 2, could be moved to appendices at the end, or another document.

We also feel that the Plan should avoid straying into technical and safety issues, which are, and should remain, the domain of Building Regulations. These are issues which planners are not equipped or empowered to assess have no place in the planning system. It remains problematic that energy and CO_2 reduction are still dealt with in planning policy and regulation, and we encourage the GLA to work with the MHDCLG to eliminate duplication and conflict here.

We also question whether planning officers have the time and the experience to assess a management plan. If not (and important though it is) it will achieve little and become just another time-consuming hoop to jump through. We wonder whether any meaningful assessment of management could be made before a building has been occupied for some time. That would suggest scrutiny through post-occupancy evaluation but we question whether this is, or should be, a planning matter.

Structure and hierarchy

The over-arching role and importance of the Good Growth principles means that these should be the ultimate test when preparing and considering proposals.

Policy GG1 Building strong and inclusive communities

Policy GG2 Making the best use of land

Policy GG3 Creating a healthy city

Policy GG4 Delivering the homes Londoners need

Policy GG5 Growing a good economy

Policy GG6 Increasing efficiency and resilience

We wonder whether these headings could be used to structure the rest of the Plan and its policies; making it clear how they are to be delivered? A cascading 'tree diagram' would be a good way to demonstrate how the rest of the policies devolve from, and flesh out, the GG principles. This would improve the clarity of the document as a whole.

Chapter 3: Design

While we warmly welcome the strong emphasis on good design, we question whether a dedicated chapter is the best way to promote its importance. As currently drafted, over half of the content of this chapter relates to housing.

There appears to be little rationale behind the topics that have been included here. We are unsure why the space standard and 'fire safety and safety, security and resilience to emergency' are included in the design chapter (arguably not design issues at all) while issues such as green and sustainable infrastructure, are not mentioned.

We suggest that it would be more sensible and intuitive to deal with as many housing related issues as possible in the next chapter, which is dedicated to housing. As this would leave relatively little material in Chapter 3, we suggest that other more general points, would sit better the introduction. Coming at the start

would give more weight and prominence to the importance of good design. It will be the key to achieving the Good Growth Principles in Chapter 1 and all other Plan objectives. Alternatively, the GLA may like to consider introducing a seventh GG principle specifically about design.

Chapter 11: Funding

We are disappointed that so much is being said about the problems associated with funding, and so little about the solutions. While greater devolution may provide an answer, it is dangerous to rely on this and it risks pitching Mayors/regions into battle with each other when the reality is that all parts of the country require investment. While it is important to be ambitious, results are what count. Success will be judged on the quality of built outcomes, not on the wording of the plan policies, and this will rely on realistic levels of financial support.

Other points

There is a very heavy reliance on increasing density as a means to increase housing numbers. While we support this strategy in principle (particularly in the suburbs, where there should be a general presumption in favour for up to 5/6 storeys where adequate transport and social infrastructure are available or imminent), and we appreciate that the phrase used is 'optimising' (density) not 'maximising', the over-riding impression is that density should be maximised.

The word 'unit' should be replaced by 'home' or 'dwelling' throughout

If habitable rooms are to be referred to, and particularly if they are used within a metric (e.g. a measure of density or a way to asses like-for-like replacement of affordable housing) the word 'habitable' should be defined in the glossary.

Could a reference be supplied for the claim that life expectancy varies by up to 19 years between boroughs as this does not seem to be borne out by ONS data?

We have not provided comments on Chapter 5 (Social Infrastructure) but would like to express strong support for the concept of local community hubs; multi-purpose facilities that support multigenerational, multicultural interaction. Such facilities can be a first port of call for those in need of help, advice or information (providing contact details of local charities, organisations and services), provide onsite facilities such as health checks, podiatry, exercise classes, sport, music and dance, safe play, affordable child care, adult day care, after school care, evening classes and coordinate outreach services such as meals-on-wheels and social care. All of this helps to build a sense of community, encourage participation and mutual support, improve health and reduce loneliness.

Introducing the plan

P xiv   Could a reference be supplied? (the claim that life expectancy varies by up to 19 years between boroughs does not seem to be borne out by ONS data).

Specific Chapter Comments

Chapter 1: Planning London's Future (Good Growth Policies)

Planning for Good Growth

1.0.4 to 1.0.6	Agree. These acknowledge the problems true to London at present and set the scene referring to economic factors as well as quality of life.
1.0.8	The economic argument is not holding true here. It needs to be balanced out with the financial viability of projects. Viability must be incorporated into projects much earlier.
	'Planning new developments' - To include redevelopment of existing homes/neighbourhoods and estates.

Building strong and inclusive communities

1.1.4	Add in need to encourage cycling and walkability to promote healthy lifestyles.

Policy GG1 Building strong and inclusive communities

Generally the terms used in Policy GG1 are loose and require clarification. It appears as aspiration which sets the vision as opposed to being measurable policies.

A	'other opportunities' - clarify what these include e.g. SME's?
B	'strengthen communities' - expand, e.g. public spaces and Town Centres.
F	'avoiding separation or segregation' - spaces to be inclusive. Requires addressing the public private space debate and ensuring that public spaces which are truly public are central to building inclusive communities. Designing public spaces which are adopted by councils and have funding mechanisms in place to ensure their maintenance and up keep will be integral in providing for all.

Making the best use of land

1.2.2	Agree
1.2.3	Agree, but need to place emphasis on the support infrastructure (e.g. schools, GP's, transport provision such as bus frequencies) required for a growing population.
1.2.6	Add in green infrastructure and reduction in pollution levels.

Policy GG2 Making the best use of land

D	Need to allow for targeted development within the metropolitan green belt where it reinforces growth strategies of regional and national significance. Where appropriate, targeted and compatible, mixed use development within the metropolitan green belt should be seen as part of a suite of measures that includes development of brownfield land, to address the chronic undersupply of housing delivery.
	Within the Greater London boundary 22% of all land is designated as Green Belt. Some parts of the Green Belt are more accessible than others, but it includes many areas close to existing stations. Realising the potential of other areas may require investment in substantial new infrastructure. Some of the Green Belt is of great value and must remain fully protected. Green Belt designation does not imply beauty, public access or biodiversity. Only a fifth of London's Green Belt has an environmental status or is accessible to the public as green space.
	A full land quality assessment register should be compiled for the Green Belt. Controlled release of appropriate bits of Green Belt could be an effective way to deliver substantial numbers of new homes. Super compensatory environmental mitigation measures as well as exemplar Design standards should be required for any development within the Green Belt.

E   Agree, however we should be striving for greater than 80% as cycling and walking need to be at the forefront of transport. In order to achieve this everything needs to be more localised so the proximity of work, to homes, to services and to supporting infrastructure becomes increasingly important.

Creating a healthy city

Policy GG3 Creating a healthy city

Add in: mixed use communities are beneficial for mental health and well-being.

B/G   Add in: promote allotments, community gardens and grow your own initiatives which contribute to healthy food and healthy lifestyle choices, whilst also promoting a sense of community ownership within both existing and new developments. Rooftop spaces could be used for this type of activity.

Delivering the homes Londoners need

1.4.4   'Boroughs can rely on these targets' - change this to 'Boroughs should address these targets'.

1.4.6   Agree with Build to Rent.

Policy GG4 Delivering the homes Londoners need

The policy does not consider what the tools are to ensure that the targets are being met, or if there is a support mechanism in place if targets are not met. The chapter should include this, or refer the reader to further policies/guidance documents where this information is available.

B   Link this to financial viability, and refer to the paragraph/policy which states the approach that should be taken where 50% affordable housing is not viable.

E   Agree

Growing a good economy

1.4.10   'growth in town centres across London will be equally important' - Add in the importance of the High Street to town centres and their economy.

Policy GG5 Growing a good economy

Agree with all.

Add in: a statement about the need for more flexibility in planning which would allow for creative industries and start-up companies. Planning needs to be able to accommodate more flexible land use and not just stick to strict land use designations.

Add in: digital connectivity and digital infrastructure - London will need to catch up with some other global cities in terms of high speed internet etc.

Increasing efficiency and resilience

1.5.5   Agree

Policy GG6 Increasing efficiency and resilience

C   'Create a safe and secure environment which is resilient against the impact of emergencies including fire, terrorism and flooding.'

D   Mention the term Smart Cities. It has been included in the proceeding paragraphs (1.5.5) but not explicitly translated into policies.

Chapter 2: Spatial Development Patterns

Figure 2.1 - The Key Diagram

The diagram is complicated and requires simplification - perhaps the layers can be broken down and shown on separate layers in a series of supporting diagrams.
The colours on the diagram for the opportunity areas are difficult to read.
The diagram also needs to show the hierarchy of key locations, opportunity areas etc. and demonstrate the 'corridor' relationships that are happening within London.

2.0.1 to 2.0.3	Whilst this is intended to provide an overview to the section, there could be a problem statement or more specific context prior to or within this?
2.0.5	'beyond London's boundaries' – beyond zone 9 should also be considered
	'collaboration' - add more information here: closer working relationships and joint ventures would help. Taking a more regional approach or focus will be integral in achieving successful cross-borough collaboration.
2.0.6	Add in the value of High Streets.

Growth Corridors and Opportunity Areas

Policy SD1 Opportunity Areas

A 3)	Agree.
A 4)	Agree, particularly as TfL are often involved in the design process too late.
B 9)	Add in: 'ensure planning frameworks are subject to public and stakeholder consultation' at early stages of the planning process, in order to get their support and buy-in. [This is particularly important for land owners within the site or adjacent to the site].

Figure 2.2 - OAPF process diagram

Good diagram.

2.1.5 to 2.1.7	Agree.

Supporting London's Growth

2.1.8 to 2.1.11	Agree.

Figure 2.3 - Key to symbols on the growth area figures

The location of this key in the document is confusing, it needs to be moved the a more relevant page and ideally the key should be on all pages where the diagram requires this key to be able to interpret and understand what the diagrams are trying to show - diagrams on pages 34, 37, 40, 44, 48, 50, 52, 54 and 56.

Central London

Figure 2.11 - Central London

Diagram is too busy and requires simplification. Legend also required.

Trams Triangle/London-Gatwick-Brighton mainline

Policy SD2 Collaboration in the Wider South East

A, B and C	Agree with the policies, however, a regional planning focus will be important in order to tackle the issues identified in policies A, B and C.

Policy SD3 Growth locations in the Wider South East and beyond

Agree.

Figure 2.15 Wider South East – 13 Initial Strategic Infrastructure Priorities

Agree with this diagram. Extend beyond the area shown in the map, to include Bristol in the South-West.

The Central Activities Zone

Policy SD4F The Central Activities Zone (CAZ)

Whilst the international economies of scale are important to London, there is also a local economy and London must ensure that is retains the contrast and mix in characters and economies of scale.

Figure 2.16 - CAZ diagram

Questioning whether the two international Town Centres identified on this map are actually of the same weight in the city's economy?

This map overlooks the importance of the economy in the east of the CAZ. Shoreditch, for example,

is a gateway to the CAZ in the east and the London Plan should promote this, encourage the development of the east and show aspirations for places like Shoreditch to raise their profiles further.

Although outside of the CAZ, Stratford similarly has an important role.

Perhaps this diagram is focussing on traditional perceptions of the economies and overlooking the younger perception of the city?! I.e. it is focussing on the west end as opposed to the east?

2.4.14 to 2.4.18   Agree.

Policy SD5 Offices, other strategic functions and residential development in the CAZ

A   Agree

B   Not convinced by this as mixed use development can be very successful. We would need to see the plans.

2.5.8   Agree

Town Centres

Policy SD6 Town centres

Agree

2.6.3   The fact that trip journeys for home deliveries has increased significantly, raises the question as to whether we need to constrain the delivery times in certain areas of the city to reduce vehicular traffic and congestion which is heightened by deliveries.

2.6.4   Agree

Policy SD7 Town centre network

C   This is good as it is keeping control of the wider vision. However, has this been consulted on with all of the Boroughs?

E   District centres must also focus on the provision of social infrastructure and integrating arts and culture into their economies.

Figure 2.18 Town centre classifications

Overall, this is a poor quality diagram - the colours combination is not good (particularly for colour blind readers), the boxes of bullet points need a frame around them, and it has a lot of information squashed into a small area. However, the green illustrations are useful in showing the different classifications.

Policy SD8 Town centres: development principles and development

Add in a reference to the importance of the public realm and streets in town centre development.

Also mention that retaining existing features of town centres, such as market places, can contribute to the character of the town centre.

Historic conservation is also important to address because so many Towns or High Streets are historic or have important historical assets. For example Policy SD8 may include a statement such as ' New development must address, respond to and strengthen the character of the existing Town Centre'.

A 1)   Whilst this is important, Development Plans should ensure that they respond to the direct and surrounding context of the Town Centre.

B 3)   This is good as it is taking account of the transition zones - perhaps this area can be referred to as the transition zone?

B 4)   The policy should mention how suitable town centres are for older people who are downsizing, as they would be close to local amenities.

            Add into 4 (d): 'planned or potential transport improvements – to indicate future capacity for intensification' including housing for independent older people.

B 5) d)   The London Plan should support the policy by mentioning differing innovative building typologies that could help to deliver residential uses above existing commercial, social infrastructure and transport infrastructure uses. These typologies should be of different densities and may include types such as flexible live-work units.

B 6)   Agree – very important.

Policy SD9 Town centres: Local partnerships and implementation

Agree.

2.9.1   Town centre strategies to consider how individual towns fit into the hierarchy of town centres within the London Plan, and how the towns needs are prioritised. Add in a reference to the hierarchy of town centres.

2.9.2   Agree.

2.9.3   Key stakeholders should be involved in this process at early stages. This should include both engaging and non-engaging stakeholders, and local and small businesses.

Policy SD10 Strategic and local regeneration

Add in: release land for integrating smaller businesses (SME's) and start-ups in to Town Centres.

2.10.2   Add: 'such as providing affordable workspace, creating more accessible and welcoming public realm, or investing in training and employment opportunities for local residents' and supporting SME's 'Where proposed large-scale development in Areas for Regeneration should seek to reduce spatial inequalities and provide public facilities and infrastructure such as schools, other educational institutions, health facilities etc.

2.10.3   'Successful regeneration requires all stakeholders to operate in a collaborative way, pooling resources and creating partnerships...' Agree. Add in a statement in Policy SD10 to reflect this.

2.10.6   'identify, protect and promote the places and spaces that are particularly valued by local communities...' Agree. This also needs to be reflected in Policy SD10.

Chapter 3: Design

Policy D1 London's form and characteristics

In general, we would recommend the use of more positive wording when describing built space and the power of high quality design, and how good design can add value to a place. For example 'Buildings will enrich the city for many years, therefore a long-term perspective should be taken'.

A number of the policies are vague /obvious and difficult to address subjectively, for example:
- A 2) Facilitate an inclusive environment
- A 4) Deliver an appropriate outlook, privacy and amenity
- A 5) Achieve safe and secure environments
- B 2) (development design should) be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan, through appropriate construction
- B 3) Aim for high sustainability standards
- B 6) Achieve comfortable and inviting environments both inside and outside buildings.

3.1.4	We recommend the protection of existing levels of open space and specific mechanisms for encouraging the creation of new open spaces.
3.1.9	We recommend adding a sentence to emphasise the importance of well-considered and durable structure to maximise future flexibility and longevity.
3.1.11	We question whether large scale developments do present more opportunities for innovative design that avoids waste etc. Smaller developments can make use of salvaged material more easily for example.
3.1.12	We welcome the support for the circular economic model.
	We would suggest that the phrase 'best use of the land', is explained to ensure that this is not interpreted as simply maximising development. 'Best social value' or, most 'appropriate' use of land, may be better.

Policy D2 Delivering good design

We welcome the engagement process recommended in Part C, and we would emphasise that it is important to discuss building character and architectural design as early as possible in the process.

3.2.1	We would suggest that the phrase 'most efficient use of land' is reworded as this implies undue emphasis on financial return. Alternatively 'efficiency' could be defined to include social.
3.2.7	Design reviews should be mandatory across all London Boroughs, preferably through borough specific Design Review Panels, but where these do not exist, through CABE or UDL.
	Most schemes need more than one review and the process should also allow for a post planning review to secure the quality of the built proposals.
	Boroughs should arrange training in 'design understanding', specifically for councillors.
3.2.10	We strongly support this proposal. In our experience design quality can really suffer where the architect is not retained post-planning. Ideally this returns to being a routine expectation of retention, avoiding the need for enforcement which could create tensions in the on-going relationship.

Policy D3 Inclusive design

We question whether this policy is needed at all as inclusive design it is one of the Good Growth Principles. However, to uphold this the principle Policy H2- G (small sites) should be rephrased to only consider a

relaxation of Category 2 where apartments are concerned, and it is not possible to provide enough flats (we suggest 15) to make service charges viable. Cross-referencing, in this case to 3.5.6 would be useful here and elsewhere.

Policy D4 Housing quality and standards

This only touches on a few aspects of housing design and quality, leaving out many others. We suggest that this section, and all other housing-related elements of Chapter 3, are relocated to Chapter 4 – Housing.

We suggest that it is noted that a mix of housing typologies and building typologies should be encouraged in new developments.

We are fully supportive of the space standard but do not believe it should be reproduced in the document as it is out with the GLAs control. We have some minor queries which we would like the GLA to resolve with the Government:

- Private Internal Space, Part 6 - When counting a portion of reduced head height as storage; it's not clear whether to include this in GIA.
- Private Internal Space, Part 7 - The built in wardrobe is likely to reduce the width to less than 2.75m width, where the room is rectangular - so this is very difficult to achieve. It is worth remembering that a freestanding wardrobe would reduce the room width the same.
- We suggest the following addition to the text: 'a portion of storage should be accessible from shared areas of the dwelling, and. not all located solely within one of the bedrooms.'

Table 3.1 - Minimum space standards for new dwellings

It is confusing that while areas with a head height below 1.5m count for storage, they do not count towards GIA.

3.4.3   While we support this policy in principle, our understanding is the GLA is not permitted to make changes to the NDSS. If permission can be obtained for an exception in London, or the NDSS can be upgraded to require 2.5m ceilings, it would be helpful to specifically require a minimum of 2.5m in habitable rooms (subject to localised boxing where this cannot be avoided) and define a lower minimum ceiling height (say 2.3m?) for the remaining spaces.

3.4.5   We suggest that this is more strongly worded, and that limiting the percentage of single aspect dwellings (perhaps to a maximum of 20%) should be considered.

3.4.6   We suggest the inclusion of a recommendation to ensure the private open space is suitable for likely residents (e.g. families?) and location (e.g. what storey of the building is the amenity at?).

We recommend adding winter gardens to the list of suitable amenity spaces.

3.4.8   'Same external appearance' should be rephrased to say that, 'there should be no discernible qualitative difference externally'.

Policy D5 Accessible housing

We suggest that this section is fully integrated with inclusive design and relocated to Chapter 4 – Housing.

3.5.2   This duplicates Building Regulations and should not be in planning policy because that implies assessment at planning stage.

3.5.5   This duplicates Building Regulations and should be removed.

3.5.7   The first half of this paragraph is unnecessary.

Policy D6 Optimising housing density

We suggest that this section is relocated to Chapter 4 – Housing

A   Need to ensure that 'optimise' is not interpreted as 'maximise' – we note that this is one of the few instances where 'must' is used and refusal is recommended where optimisation has not been achieved. While it is not helpful to dictate density, it would be reasonable for an LPA

	to suggest the acceptable height range for any given site. It would also be useful to provide a model approach to determining the capacity of a site.
B	Who is responsible for assessing existing and planned infrastructure? It is unrealistic to expect designers to be aware of planned roads or the spare capacity of local schools and other services – when assessing housing need and identifying sites LPAs must also assess infrastructure and that information should be made available. Although the scale/size of development is relevant, even 10 more children (potentially just 3 family flats) is a problem if schools are full.
C	All schemes need careful scrutiny; some low density schemes are poor quality. Will DC officers know a good management plan from a bad one? They are likely to be generic and may not be implemented in practice. These seem very arbitrary thresholds and could lead to developers keeping just below them to avoid scrutiny.
D 2)	Habitable rooms should not be used unless the term can be tightly defined.
3.6.3	Elsewhere it is states that development should be proportionate to the existing infrastructure that support it. However, transport infrastructure is treated as a special case where developments should take both existing and future capacity into account. This could result in developments that stress existing transport infrastructure for a long period of time awaiting new transport which may not materialise. We suggest that a review mechanism is put in place to ensure that this allowance is not abused.
3.6.9	A range of model examples of density calculations on different types of sites should be included in the Housing SPG and cross-referenced here.
3.6.10	The measurement of maximum height needs more thought – 'major component' is ambiguous. Applicants should also be required to indicate heights on plans and elevations.

Policy D7 Public realm

A	'Highest quality of design' is a big ask and very difficult to assess.
3.7.2	Not all buildings that frame public realm spaces can be multi-functional – should this apply to major spaces only?

Policy D8 Tall buildings

We question whether it makes sense to define generic policies for tall buildings if 'tall' is defined by each borough?

Tall Building locations should be agreed in Development Plans which are agreed across Borough boundaries.

3.8.2	There is a huge difference between 25m (up to 8 storeys) and 150m (up to 50 storeys) – surely anything more than 30m is 'tall' wherever it is?

Policy D9 Basement development

A	This is very vague.
3.9.2	The meaning is unclear of this sentence is unclear: 'Where basement developments cause particular harm, boroughs can consider introducing Article 4 Directions to require smaller-scale proposals to obtain planning permission.'

Policy D10 Safety, security and resilience to emergency

Technical issues should not be included in planning policy.

Policy D11 Fire safety

This policy need to be removed, it confuses the regulatory process and cuts across Building Control regulations. It is worth noting that fire standards are currently under review.

Policy D13 Noise

On very noisy sites, mechanical ventilation is sometimes the only way to mitigate overheating in summer.

Chapter 4: Housing

Policy H1: Increasing housing supply

4.1.2   Local Authorities across London have neither the capacity nor adequate skills to deal with thousands of new planning applications to support increased housing delivery on the scale envisaged. Without this, any investment post planning is wasted. There needs to be specific re-skilling for those appraising planning applications and discharging conditions - this will require investment in staffing.

4.1.3   Whilst we welcome a focus on an increased supply of housing, meeting targets should never be to the detriment of the design standards set out in Chapter 3.

4.1.4   The construction industry requires specific training programs for emerging technologies such as offsite, manufacture and these need to be widely adopted.

4.1.5   To achieve this Local Authorities will require training spanning the full process of commissioning, designing, constructing, maintaining and managing housing (both existing and new housing stock).

Policy H2 Small sites

The threshold for small sites given in part D is 25 homes, not the usual 10, this is explained in paragraph 4.2.3 but will cause confusion in terms of government policy. We suggest this is added to the glossary of terms.

Part D needs a stronger emphasis on the quality of design, its scrutiny and the importance of an appropriate scale of development - for example on sites within, or adjacent to, conservation areas.

We question why estate regeneration is included in the exclusions list in Part F for small site development, when infill development could be an obvious means to deliver under 25 units. A definition of regeneration would be useful.

4.2.5   This paragraph could include specific encouragement for roof top extensions on small sites, using lightweight MMC technology; and could encourage several smaller developments within the same borough to be brought forward together to maximise development opportunities.

4.2.6   Perhaps there is an opportunity to promote the use of existing design guides to set design standards, such as the NHF Housing Standards Handbook for example.

4.2.8   Overlooking is not overcome merely by re-positioning windows. Homes and their internal layouts should be carefully planned to minimise overlooking and protect privacy. It is about good and appropriate design to avoid overlooking, not just mitigation when overlooking occurs.

4.2.10   Is community-led housing defined in the Glossary?

               Local Authorities should be encouraged to sell land for a fixed price and then judge potential buyers by other "Best Value" factors such as social/ community value, design quality, environmental sustainability, contribution to local jobs/ economy. This is a standard process used in many cities in northern Europe.

               When evaluating Best Value appraisals, many Local Authorities currently find it difficult to take into account other aspects of the development, other than solely financial Best Value, such as long-term place-making value, environmental and social sustainability. Guidance on this from the GLA would be beneficial, and would strongly support new entrants to the market.

               A designated planning use class could be created for community-led development. This could be defined as 'land that can be developed only with the direct involvement of the end occupants of the dwellings'. This would allow smaller sites, or portions of sites, to be designated for community-led housing in Local Plans. It would create a separate and parallel land market for this type of housing, and would allow planners to plan for community-led

housing without needing to actively own the land themselves. The GLA should aim to transfer suitable public land to CLTs wherever possible, or at least offer them the first option to purchase at sub-market value.

As long as community led housing is appropriately defined to lock in long-term affordability, the planning use class could allow it to be incentivised by being exempt from CIL. This could encourage large developers to develop a site with other partners, e.g. community groups/ smaller developers.

Neighbourhood Plans could be used to identify sites suitable for community-led development which could then feed into the Local Plan.

All Local Authorities should be required to have Local Plan in place, and should include policies on community-led housing.

4.2.11   We agree with this statement, but the reverse should also be resisted where subdivision results in sub-standard flats.

Policy H3 Monitoring housing targets

We are dissatisfied with the proposal, under Part D, that each bedroom in a care home should be counted as a single home. A ratio of 2:1 might be more suitable. We would emphasise that it is important that they (and other types of non-self-contained accommodation) are separately identified in statistics – including completions and density.

We would recommend that planning use class C2 be redefined as non-self-contained accommodation and include care homes and shared living. This would allow appropriate standards to be set for their design. Though shared living housing is intended to be short term, without safeguards to ensure this, we are concerned that they may become long term homes, possibly even for families, hence the desire for them to be properly recognised, and not left to Sui Generis.

4.3.3   It should be noted that non self-contained accommodation is not comparable or equivalent to normal housing stock so should be subject to different standards.

Policy H4 Meanwhile use

Meanwhile Housing appears to be Temporary Housing, rebranded. Any temporary housing needs much more quality control than is defined in this policy. Specific standards and timescales are needed to avoid the substandard, permanent pre-fabs of previous eras.

4.4.3   The time period for "meanwhile" homes is too ambiguous and open to abuse - perhaps it should be linked to a particular development and site phasing strategy, or a maximum number of months, with an option to request an extension.

We would also recommend that more detail is provided in this policy in terms of what groups of people it might be suitable for.

We would recommend borough-wide or sub-regional coordination of this type of provision. If prefabricated and moveable, temporary homes could be GLA owned and rented out to boroughs very cheaply. This could also encourage reasonable quality standards.

Policy H5 Delivering affordable housing

If the acceptable minimum provision of affordable housing, under H6-B-1, is 35%, a policy requirement (even a strategic one) for 50% is at best confusing. We are regularly asked to confirm that our designs meet all London Plan policies, and it is bewildering to clients when we explain that due to inconsistencies between policies, this cannot always be achieved and we need to produce a disclaimer. Policies should be distinct from targets and should be generally expected to be met in full.

4.5.4   We strongly support the direction of travel of this policy. We note, however, that in setting aside only 35% of housing for 'affordable' dwellings, under H6, B,1 – and recognising that these are required for those on household incomes of up to £90,000, we are still facing a

situation whereby 65% of the housing that we build is not affordable to the majority Londoners.

4.5.5   We suggest that guidance is provided as to how off site contributions should be monitored so a standard approach is taken across boroughs.

Policy H6 Threshold approach to applications

4.6.2   To avoid saturation of the system and repeated attempts at reducing affordability on the same site; once a viability test has been made via the "Viability Tested Route" for a particular site, then perhaps it should be made public and its conclusions become binding for a minimum number of years?

We would recommend standardising guidance for responding to post-planning viability reviews, which attempt to value engineer projects, so this is the same across boroughs. Any post planning changes should be part of the transparent reporting process.

4.6.3   We would recommend using bed spaces as opposed to habitable rooms since this is less open to interpretation, and forms part of the dwelling description. A definition of habitable floor space is required, so that either approach is consistent between boroughs.

4.6.6   It should be noted that industrial sites are often more expensive to redevelop, and may be less viable with the 50% affordability threshold.

4.6.9   Clearer guidance is required on which projects will attract public subsidy. Does this include any estate that an RSL is involved in whether or not they have done grant-funded work on the estate?

Policy H7 Affordable housing tenure

4.7.13   We believe that the 75% affordable housing level to avoid viability is too high to act as an incentive, since not many schemes will be near that threshold. We would recommend 60 or 65% but suggest that at least 20% should be available at social rent.

Policy H8 Monitoring of affordable housing

4.8.1   We would recommend standardising monitoring formats across boroughs.

Policy H9 Vacant building credit

4.9.1   Rather than a "Vacant Building Credit"... the GLA could consider a "Vacant Building Tax" on buildings or sites vacant for more than 5 years without active marketing. This would discourage "land banking" and encourage landowners to put sites forward for development.

Policy H10 Redevelopment of existing housing and estate regeneration

Replacement of equivalent floorspace seems poorly defined and open to interpretation – is this net, gross, GIA, etc.?

If affordable home uplift is to be maximised, this may prevent investment in other improvements to public realm or community facilities which are often essential to regeneration schemes. We suggest this is rephrased. The aim should be to optimise density (as with other developments), and that could conceivably result in fewer homes, particularly if a new community facility is a higher priority.

It should be noted that there may be instances where properties have been vacant over a long period which arguably should be excluded from this test.

4.10.4   Regeneration schemes with uplift should only be supported if they replace not only the affordable housing but also maintain or re-provide existing communal facilities & services contained on the site.

Re-provision strategies should be developed and approved by residents early in the design development.

We support the proposal that there should be no net loss of affordable homes, however, we question why estate regeneration projects should have to do the viability test even where they meet the other exclusion criteria. If there is no net loss of units and a high level of affordable provision in any uplift, a viability report would only add unnecessary financial burden. We suggest the uplift on schemes should be dealt with as per any other development, eg.: over 50% affordable on uplift would not trigger a viability statement. However, if this is proposed because the GLA wishes developers to be completely open and transparent with residents, or to ensure that residents' interests are protected, we agree that it would be fair to require the viability test.

Policy H11 Ensuring the best use of stock

4.11.1   It is not clear how this policy will work in practice. What mechanisms are envisaged to establish and monitor the number of vacant dwellings? Have any boroughs had any success in this regard?

4.11.2   This approach to "Holiday Rental" is far too lenient. 90 days a year is too much but the fact that it is impossible to police effectively is an even greater problem. The effect this has on the rental sector is dangerous and can result in far less reasonably priced rents in a particular area. Lessons should be learned from cities such as Berlin and Barcelona in this regard.

Policy H12 Housing size mix

At the moment it is not clear how "Downsizers" is being incentivised (part 9) as potentially their needs overlap with those of first-time buyers who enjoy stamp duty breaks, Help to Buy and other incentives, putting them at an advantage.

4.12.2   If housing mix responds to a particular site rather than borough's need, there is a danger that the drive commercially would be for ever smaller units. A standard mechanism would be needed for appraising housing need on a site by site basis, in order to avoid a race to the bottom. This could also lead to a failure to meet borough-wide need.

4.12.3   A couple with one child should be classed as a family. Relatively few families now comprise more than two children so as long as the bedrooms are doubles, two will often be adequate for their needs too. We would recommend changing the definition of family housing to 2 bedrooms or larger.

4.12.4   Downsizing should be considered as part of the Local Authority development plan across the borough and not on individual developments.

4.12.5   We would suggest that this needs stronger control to resist commercial pressures for small units and we would recommend that no more than 10% of the total is comprised of 1b1p.

Policy H13 Build to Rent

Access to the basic communal facilities in a scheme, such as any social spaces and external areas, should be maintained as an equal benefit to affordable rent tenants. There is a danger that these tenants might be treated differently where not controlled via either policy or the management plan.

There is no mention of required housing mix needed to obtain "build to rent" status, and we would encourage this to be defined. This is important because of the demographic mix that could be attracted to this type of product. There is a danger that smaller units are favoured over larger ones in single developments.

A number of design standards are being bypassed in the design of current Build to Rent accommodation, including minimising the number of single aspect flats, provision of private external amenity etc. The principle of tenure neutral design is therefore already severely compromised. The effects of this are exacerbated because an increasing number of Build to Rent units are lived in by families. Build to Rent should meet all other residential design standards (e.g. space, organisation and amenity). Thousands of sub-standard homes have already been created by the PRS market through permitted development, and this must be stopped.

The covenant of 15 years (under Part B2) seems too short. We would recommend a minimum of 25 years, ideally more, otherwise investors will just sell off after 15 years when developments start to need major work.

We strongly welcome the proposal for longer tenancies under Part B6. Longer tenancies are likely to result in more stable rents and fewer unsustainable price increases and enable renters to begin to consider their home as a place to live for the long term. Longer tenancies engender a sense of ontological security that has proven long term benefits to health and well-being. We would urge that 3 year tenancies be offered to tenants at no extra cost than a 1 year tenancy, to encourage take-up.

Deposits and rent-in-advance (described in Part B10), should be limited e.g.: max 2 month deposit and/or 1 month in advance, otherwise these risk being abused and effectively charged in lieu of fees.

4.13.4	We strongly support this approach, and would recommend that this it is strengthened, so that rents may not be over London Living Rent levels, unless backed by a viability argument.
4.13.6	We question why the affordable split in this housing type is less onerous than general needs housing, with no social rent requirement. We suggest that, of the affordable provision, a minimum of 60% should be London Living Rent, and not 30%.
4.13.10	It is not clear how the clawback mechanism would be monitored and what process is to clawback affordable housing contributions.

Policy H14 Supported and specialised accommodation

It would be useful if a definition of supported and specialised accommodation could be provided in the glossary. For instance, is unclear whether this type included short term emergency housing, hostels or re-ablement housing.

We welcome that fact that 're-ablement' accommodation is specifically mentioned as a type of housing, this type of bespoke short term housing can remove the need for this to be provided in B&Bs / Hotels etc which are very expensive for local councils.

Policy H15 Specialist older persons housing

There is no mention of the design or quality recommendations in the HAPPI Report as a basis of design quality. This is used so widely now as a benchmark that the omission is surprising.

A clearer guide to what constitutes a suitable level of scooter provision would be useful. While we recognise that cycles and scooters need different kinds of storage and different access arrangements, it would be prudent to permit resident cycle provision to be replaced by resident scooter provision (where resident needs demand it), as long as staff and visitor cycle and scooter spaces are also provided.

4.15.2	It is positive that downsizing is identified as a specific issue, but this clause is too vague as to how mainstream developments can also cater for older people.
4.15.3	While we welcome this type of housing being more clearly defined in terms of use classes - grouping sheltered and extra care as C3 housing means that these struggle to compete with general needs housing when sites are purchased. Either new use classes should be created C3a, C3b etc. which can then have specific policies applied to them locally to promote their use, or local development plans should identify specific sites suitable only for this type of accommodation over other forms of C3.
	We note that if extra care is defined as C3 class, all normal housing standards apply. The nationally described space standard isn't big enough, in our experience for extra care or even sheltered housing (now generally called retirement housing) and both should be designed somewhere between Part M Category 2 and Category 3.
4.15.4	The target figures quoted are based on assumptions that a very low proportion of older people will require specialist housing, however we believe the figures should be based on providing more choice across different tenures, rather than just meeting a minimum need, particularly if one approach to solving general housing need is to free up under-occupied family houses by giving the opportunity to older people to live in more appropriate

accommodation. Providing more of the right kind of accommodation would also stimulate demand.

4.15.9   There is plenty of guidance on designing for people living with dementia, and we would be happy to signpost authors to this evidence, and would recommend that it is specifically referenced here.

We would advocate that all dedicated elderly housing, as well as adult care homes, be designed to be fully accessible and to a minimum basic dementia friendly design approach and that mainstream housing also takes some account of the needs of people living with dementia.

Policy H17 Purpose-built student accommodation

4.17.3   We are concerned that this point permits some bedrooms to be used by people other than students. The term "majority" is too loose, meaning the limit is ambiguous, and open to abuse.

4.17.5   We strongly suggest that 'adequate functional living space' be better defined. The phrase is too vague, and open to abuse.

Policy H18 Large-scale purpose-built shared living

This type of housing should be formalised to allow standards for space, accessibility, energy, soundproofing, amenity, environment etc. to be introduced. Paragraph A.6. is too vague. We would also welcome strengthening this policy to prevent office conversions to this type of accommodation.

This policy is compelling shared-living to require a large, institutional, heavily serviced building; adding cost and becoming just like student housing but for an unspecified period – possibly permanent. Smaller scale, time-limited, affordable, purpose-built 'mansion blocks' with up to 20 bedsits (preferably 6-12) with a shared ground floor Living Dining Kitchen, utility room and a roof terrace would be more appropriate; or groups of bedsits with access to similar shared facilities within an ordinary apartment block.

4.18.1   Use Classes generally and Use Class C (Dwelling Houses) in particular, need a complete update and the GLA should work with DCLG to achieve this. If micro-homes and non-self-contained dwellings are to be permitted they should be formally part of Use Class C, (which already includes hostels, hotels, army barracks etc.) not classed as Sui Generis. Large scale purpose built living should be a new sub set of C class, which would allow boroughs to put in place needs assessments to limit developments across the borough.

Chapter 8: Green Infrastructure and Natural Environment

Policy G2 London's Green Belt

There is a need to allow for targeted development within the metropolitan green belt where it reinforces growth strategies of regional and national significance such as the London to Cambridge growth corridor. Where appropriate, targeted and compatible, mixed use development within the metropolitan green belt should be seen as part of a suite of measures, that includes development of brownfield land, to address the chronic undersupply of housing in London and the wider south east of England.

Within the Greater London boundary 22% of all land is designated as Green Belt. Some parts of the Green Belt are more accessible than others, but it includes many areas close to existing stations.

Realising the potential of other areas may require investment in substantial new infrastructure. Some of the Green Belt is of great value and must remain fully protected. Green Belt designation does not imply beauty, public access or biodiversity. Only a fifth of London's Green Belt has an environmental status or is accessible to the public as green space.

A full land quality assessment register should be compiled for the Green Belt. Controlled release of appropriate bits of Green Belt could be an effective way to deliver substantial numbers of new homes. Super compensatory environmental mitigation measures as well as exemplar Design standards should be required for any development within the Green Belt.

Policy G4 Local green and open space

D   Strengthen wording to read 'The loss of green and open spaces should be avoided. If losses are proposed, equivalent or better quality provision should be made within the local catchment area unless an up-to-date needs assessment demonstrates this is unnecessary.'

E 2)   Fully support requirement to plan for future green and open space in areas of change.

Policy G5 Urban greening

A   Concern over 'green wall' reference - green walls are frequently seen to fail and are high cost items which require onerous maintenance requirements. Emphasis should be on elements which will endure and offer longevity without being 'token' purchases.

B   Suggest target scores need to be assessed by a suitability qualified professional to ensure accuracy and validity.

8.5.1   Emphasis on design teams including relevant professionals to adequately consider urban greening measures including ecologists and landscape architects.

8.5.2   Suggest inclusion of potential financial benefit of urban greening/biodiversity (akin to that expressed for tree cover in Para 8.7.3) to demonstrate appeal and benefit to commercially-minded clients and organisations.

Table 8.2 - Urban Greening Factors

Concern over lack of detail, definitions and examples noted.

Suggest SPG specifically to cover this in further detail, including process of evaluation - again cite

need for suitability qualified professional to ensure accuracy and validity of assessment. Examples:
- 'standard trees planted in natural soils or in connected tree pits' – further detail required to
- differentiate between 'good' and 'bad' tree pit approaches.
- 'hedges (lines of mature shrubs one or two shrubs wide) - see RHS for guidance' - this is too specific and does not allow for most common forms of hedge planting.
- 'Groundcover planting' - again too general

Policy G6 Biodiversity and access to nature

B   Concern over lack of reference within B (3) to local authority and regional Biodiversity Action Plans (BAPS).

D   Suggested amended wording to: 'Proposals to demonstrate actions taken to enhance biodiversity should be made available from the start of the development process with consultant teams including suitably qualified landscape architects and ecologists.'

Policy G7 Trees and woodlands

Suggested amended wording to 'Development proposals should ensure that existing trees of quality are retained'.

Concern over lack of clarity on 'trees of quality' - suggest reference to BS 5837:2015 within guidance notes.

Final sentence suggest re-wording to 'The planting of additional trees should generally be included in new developments – particularly large canopied-species (where appropriate) to exploit a wider range of benefits due to the larger surface area of their canopy.'

Chapter 9: Sustainable Infrastructure

Policy SI1 Improving air quality

Support.

Policy SI2 Minimising greenhouse gas emissions

Object.

Use an in-use 2030 zero carbon definition and add a forth step to the energy hierarchy (be seen). 'Operational Zero Carbon' by 2030 for all new buildings - this moves beyond the current definition of a 'design prediction' using a 'percentage CO2 reduction', to deliver actual operational and measured zero carbon buildings.

A	Major development should have zero carbon emissions in operation by 2030. This means reducing carbon dioxide emissions from construction and operation, and minimising both annual and peak energy demand in accordance with the following energy hierarchy
	1) Be lean…
	2) Be clean….
	3) Be green …
	4) Be seen: monitor, verify and report on energy performance in use.
B	Remove the words "will be expected to": '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 monitor and report on energy performance.'
C	Remove "in meeting the zero carbon target". This over represents the impact a 35% reduction beyond Building Regulations would have on achieving operational zero carbon. Remove "aim to" for the 10 and 15% reduction targets and introduce "a minimum of" to provide a clear level of performance.
	'A minimum on-site reduction of at least 35 per cent beyond Building Regulations is expected. Residential development should achieve a minimum of 10 per cent, and non-residential development should achieve a minimum of 15 per cent through energy efficiency measures. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided:'

Consider bringing life cycle carbon into policy though the addition of a clause E in policy SI 2. Wording to read: 'Referable schemes should quantify whole life carbon through a nationally recognized Carbon Life Cycle Assessment (Carbon-LCA) & demonstrate actions taken to reduce lifecycle carbon informed by this analysis.'

9.2.9	Swap the word "demand" for "consumption". Move clarification on monitoring and reporting techniques to the SPG as these may change over time – remove "such as by displaying a Display Energy Certificate (DEC)":
	"The move towards zero-carbon development requires comprehensive monitoring of energy consumption and carbon emissions to ensure that planning commitments are being delivered. Major developments are required to monitor and report on energy performance and reporting to the Mayor for at least five years via an online portal to enable the GLA to identify good practice and report on the operational performance of new development in London."
9.2.10	In the list of content in energy strategies - change the following:
	g. Reword text to encourage variety and innovation in applications and remove proscriptive technologies. The word 'response' should be replaced with the word 'management':

To anticipate infrastructure capacity challenges for a growing London, submit proposals for energy demand management and reductions in peak energy demand.

h. Swap the words "proposals for" to "demonstrate", swap the word "demand" for "consumption", and add the words "monthly and reported" for clarification of frequency:

Demonstrate how energy consumption and carbon emissions post-construction will be monitored monthly and reported annually (for at least five years).

Remove "by 2050" and change to "in operation by 2030":

Proposals explaining how the site has been future-proofed to achieve zero-carbon on-site emissions in operation by 2030.

k. Strengthen wording to take into account the whole life cycle of materials as well as the embodied carbon:

Proposals to demonstrate actions taken to minimise whole life cycle carbon

Policy SI3 Energy infrastructure

Object.

Edit the heating hierarchy by:

- Swapping clauses a. and b. and re-phrasing to include energy sharing and efficiency measures. Also only ask applicants to connect to local heat networks where they are working efficiently, the cost of heat to occupants is reasonable, and there is a zero emissions transition plan in place.
- Merging clauses c. and d. do that zero emission sources are preferred.
- Merging clauses e. and f. for the use of CHP and gas boilers. CHP should only be used where it is suitable for the size and demand of the development. CHP or gas boilers should only be used where there is a zero emissions transition plan in place.

Therefore the policy should read as follows:

D   Major development proposals within Heat Network Priority Areas should have a communal heating system.

1) the heat source for the communal heating system should be selected in accordance with the following low carbon heating hierarchy:

a) connect to an energy sharing network through the capturing and using of waste heat and/or use of available local secondary heat sources.

b) connect to a local existing or planned heat network where it is demonstrated to be running efficiently, the cost of heat to occupants is comparable to national average heating fuel costs, and there is a zero emissions transition plan in place to ensure that the development achieves zero carbon emissions in operation (if it is not already fossil fuel free).

c) generate clean heat and/or power from zero-emission sources (examples include: solar technologies, heat pumps and energy storage powered by renewables).

d) use low emission combined heat and power (CHP) (where suitable for size and demand of development) or ultra-low NOx gas boilers (in areas where legal air quality limits are exceeded all development proposals must provide evidence to show that any emissions related to energy generation will be equivalent or lower than those of an ultra-low NOx gas boiler). If the development uses fossil fuels then a zero emissions transition plan must be in place to ensure that the development achieves zero carbon emissions in operation by 2030.

Policy SI4 Managing heat risk

Support.

Strongly agree with this policy and guidance.

Chapter 10: Transport

Growth corridors and Strategic Infrastructure Priorities are the priorities in the draft London Plan's spatial strategy, with the 'Healthy Streets Approach' the cornerstone of the Mayor's transport policies for development plans and proposals, supported heavily by TFL.

The intention is to improve health and reduce health inequalities, while increasing levels of walking, cycling and public transport use towards the 80% target of all trips by 2041. The Healthy Streets Approach will be instrumental in improving environmental quality and reaching the 2050 zero carbon target that the Mayor has set. Linked to this is the intent to promote car free development in areas with high PTAL levels.

Policy T1 Strategic approach to transport

10.1.1 to 10.1.5   Fully support aspiration that 80% of all trips to made by foot / cycle / public transport by 2041. Rebalancing the transport system is laudable, as well as promoting high quality transport interchanges.

Policy T2 Healthy Streets

10.2.1 to 10.2.7   Fully support aspiration for promotion of shorter trips, as well as the integration of freight initiatives through sensitively designed freight facilities. Freight to be better integrated into transport planning initiatives. The 10 Healthy streets targets shouldn't just be focussed on Opportunity areas and new development, but be promoted generally throughout London.

10.2.8   Further clarity required on the aspiration for reducing danger on streets. Much stronger aspiration required if cycling is going to achieve the levels required by the London Plan. Vision Zero to have greater emphasis if sustainable travel targets are going to be achieved.

Policy T3 Transport capacity, connectivity and safeguarding

B 3)   Need to include London Green Grid Network in list.

Table 10.1 - Indicative list of transport schemes

ULEZ to target all forms of transport, London wide not just central London.

Policy T4 Assessing and mitigating transport impacts

F   Development proposals should improve road danger, not maintain the status quo. Public realm proposals should seek to mitigate road accidents – the close collaboration between architects, urban designers, landscape architects and transport consultants therefore becomes increasingly important.

10.4.3   To include at the end of paragraph: such as Green Infrastructure (G.I.)

Policy T5: Cycling

Strengthen Paragraph A, to include 'cycling for all demographics'

Table 10.2 - Minimum cycle parking standards

Higher parking standards should apply London wide, not just within the favoured central London Boroughs. If car dominance is to be mitigated then a strategic overview needs to be taken London wide in terms of parking facilities for all. Only 5 percent potentially cyclable trips in Outer London were cycled, compared to 9 percent in Inner London and 14 percent in Central London. The promotion of cycling in outer London boroughs to be strengthened to promote point to point journeys, as opposed to the hub and spoke movement.

10.5.1   To include at the end of paragraph: 'and demographics'

10.5.2 to 10.5.3   Higher cycle parking standards to apply London wide, in accordance with the aspirations of 10.5.4.

Policy T6 Car parking

Fully support the intention to promote car free development in areas with high public transport accessibility.

Policy T6.1 Residential parking

Comment required on design of car parking areas, to ensure that the visual impact of parking areas are mitigated and considered in development.

Table 10.3 - Maximum residential parking standards

Parking levels shouldn't distinguish between outer London and inner London but be consistent based upon PTAL levels.

Parking strategies to be tenure blind and not have higher levels for private residential schemes.

10.6.1	Higher cycle parking standards to apply London wide, in accordance with the aspirations of 10.5.4.
10.6.3	PTAL levels are a crude determinant of development density. These should be urgently reviewed to include TfL's Cycle Hire Scheme and walkability to public transport facilities within PTAL calculations. This will allow for increased density of development.

Policy T7 Freight and servicing

Regional Consolidation and distribution centres to be a key consideration in transport planning / servicing strategies.

Levitt Bernstein comments

Draft London Plan 2018: Levitt Bernstein General Comments

CONCERNS

Size, complexity and repetition

The purpose of the document is clearly explained and the six overarching Good Growth policy headings provide a strong, clear start. But this is a huge document. Despite the many calls for it to be substantially shorter than the current plan, it is instead, longer. Just reading it is a daunting task, impossible in one, or even two, sittings. To achieve a full understanding of the contents, and become familiar with them, will require many further readings.

We fear that its size and complexity will be off-putting to the many Londoners who are not built environment specialists, but have a keen interest in London's future development. Anyone seeking to understand what is planned for their area, what developers and/or their neighbours can, and cannot, do, or what their housing options and prospects are, will find it difficult.

This is a pity because the current Mayoral team has worked extremely hard to be inclusive in its work to date. Many professionals will also find it challenging and we are concerned that it will be only be used when necessary to justify an approach, rather than used routinely so that the strategic spatial priorities become embedded in our thinking.

While we understand that policies need to be justified, the text is unnecessarily long and repetitive. Many of the overarching principles are self-explanatory and require little, if any, justification. Moreover, they need not be repeated. For example, inclusive design is a broad and familiar concept that only needs to be defined once. As it is the first of the Good Growth policies, we question whether it needs to appear again in every chapter and in numerous policies.

The policies

The policies are the most-used and are arguably the most important elements of the London Plan. The large number of policies is a concern in itself but they are also complicated in structure. The referencing protocol needed to cope with this multi-layering is cumbersome (e.g. D6 A 1).

A number of policies comprise a mix of targets/ambitions (which are not expected to be met in full), vague recommendations (which are difficult to assess) and specific requirements (some of which are too detailed for a strategic document).

We provide some examples below:

Policy GG4 A is one of many policies that include a very loose requirement:

'*Ensure that more homes are delivered*'

Paragraph 3 of Policy D4 'Housing Quality and Standards' reads as follows:

'*Qualitative aspects of a development are key to ensuring successful sustainable housing and should be fully considered in the design of any housing developments*'.

Both are so obvious that they need not be stated. The wording is too loose and subjective to assess with any degree of rigour and consistency, which means they are likely to be ignored, or contested and lead to protracted negotiation.

D4 then goes to the other extreme by reproducing the full detail of the Nationally Described Space Standard (NDSS). This is a government-owned standard that may change or be withdrawn in the lifetime of the Plan, and is an inappropriate level of detail for a strategic document. (It also breaches the March 2015 Ministerial Statement by changing the minimum ceiling height from 2.3m (in the NDSS) to 2.5m. Having said that, we agree that 2.3m is too low and urge the GLA to work with the government to get this changed).

Policy H5 'Delivering affordable housing' begins as follows: '

'The strategic target is for 50 per cent of all new homes delivered across London to be affordable'.

Without significant subsidy, the majority of developments will not exceed the minimum requirement of 35% affordable. While 50% is the strategic target, the reality is that it will not be met routinely. This calls into question whether it should be expressed as a policy at all.

Designers are often required by client's briefs or appointments to confirm that all London Plan Policies have been met. As it stands, we would need to provide numerous caveats and qualifications before confirming compliance. This would be time-consuming for all concerned.

Overall, and despite its length (or perhaps because of it) the Plan lacks clarity and weight. We are also conscious of the fact that it will be supported by many other documents, most of which, we, and other designers, will need to digest and reflect in our work. Taken together, the suite of documents is likely to run to thousands of pages. Many of the documents will also refer to other external publications.

We also have to understand and comply with the Building Regulations, and increasingly need to deal with aspects of regulation during the design stage to avoid being caught out later. There is a danger that the time it takes to read this material, and achieve and demonstrate compliance, will leave too little time for the creative process itself.

SUGGESTIONS

A simpler and more concise approach

We would like to see a much shorter, more readable document with fewer policies. Generally this does not mean lower ambitions, but more succinct and meaningful requirements. Ideally, we would like a document with a maximum of 100 pages of main body text, and 25-30 policies.

Avoiding repetition and loose, or over-obvious, statements would go some way to achieving this end. Relocating some of the detail, either to appendices or to supplementary guidance should also be considered. For example, the detail on Opportunity Areas and Town Centres, in Chapter 2, could be moved to appendices at the end, or another document.

We also feel that the Plan should avoid straying into technical and safety issues, which are, and should remain, the domain of Building Regulations. These are issues which planners are not equipped or empowered to assess have no place in the planning system. It remains problematic that energy and CO2 reduction are still dealt with in planning policy and regulation, and we encourage the GLA to work with the MHDCLG to eliminate duplication and conflict here.

We also question whether planning officers have the time and the experience to assess a management plan. If not (and important though it is) it will achieve little and become just another time-consuming hoop to jump through. We wonder whether any meaningful assessment of management could be made before a building has been occupied for some time. That would suggest scrutiny through post-occupancy evaluation but we question whether this is, or should be, a planning matter.

Structure and hierarchy

The over-arching role and importance of the Good Growth principles means that these should be the ultimate test when preparing and considering proposals.

1. Policy GG1 Building strong and inclusive communities
2. Policy GG2 Making the best use of land
3. Policy GG3 Creating a healthy city
4. Policy GG4 Delivering the homes Londoners need
5. Policy GG5 Growing a good economy
6. Policy GG6 Increasing efficiency and resilience

We wonder whether these headings could be used to structure the rest of the Plan and its policies; making it clear how they are to be delivered? A cascading 'tree diagram' would be a good way to demonstrate how the rest of the policies devolve from, and flesh out, the GG principles. This would improve the clarity of the document as a whole.

Design (Chapter 3)

While we warmly welcome the strong emphasis on good design, we question whether a dedicated chapter is the best way to promote its importance. As currently drafted, over half of the content of this chapter relates to housing.

There appears to be little rationale behind the topics that have been included here. We are unsure why the space standard and 'fire safety and safety, security and resilience to emergency' are included in the design chapter (arguably not design issues at all) while issues such as green and sustainable infrastructure, are not mentioned.

We suggest that it would be more sensible and intuitive to deal with as many housing related issues as possible in the next chapter, which is dedicated to housing. As this would leave relatively little material in Chapter 3, we suggest that other more general points, would sit better the introduction. Coming at the start would give more weight and prominence to the importance of good design. It will be the key to achieving the Good Growth Principles in Chapter 1 and all other Plan objectives. Alternatively, the GLA may like to consider introducing a seventh GG principle specifically about design.

Funding (Chapter 11)

We are disappointed that so much is being said about the problems associated with funding, and so little about the solutions. While greater devolution may provide an answer, it is dangerous to rely on this and it risks pitching Mayors/regions into battle with each other when the reality is that all parts of the country require investment. While it is important to be ambitious, results are what count. Success will be judged on the quality of built outcomes, not on the wording of the plan policies, and this will rely on realistic levels of financial support.

Other points

- There is a very heavy reliance on increasing density as a means to increase housing numbers. While we support this strategy in principle (particularly in the suburbs, where there should be a general presumption in favour for up to 5/6 storeys where adequate transport and social infrastructure are available or imminent), and we appreciate that the phrase used is 'optimising' (density) not 'maximising', the over-riding impression is that density should be maximised.

- The word 'unit' should be replaced by 'home' or 'dwelling' throughout

- If habitable rooms are to be referred to, and particularly if they are used within a metric (e.g. a measure of density or a way to asses like-for-like replacement of affordable housing) the word 'habitable' should be defined in the glossary.

- Could a reference be supplied for the claim that life expectancy varies by up to 19 years between boroughs as this does not seem to be borne out by ONS data?

- We have not provided comments on Chapter 5 (Social Infrastructure) but would like to express strong support for the concept of local community hubs; multi-purpose facilities that support multigenerational, multicultural interaction. Such facilities can be a first port of call for those in need of help, advice or information (providing contact details of local charities, organisations and services), provide onsite facilities such as health checks, podiatry, exercise classes, sport, music and dance, safe play, affordable child care, adult day care, after school care, evening classes and coordinate outreach services such as meals-on-wheels and social care. All of this helps to build a sense of community, encourage participation and mutual support, improve health and reduce loneliness.

Introducing the Plan

P xiv   Could a reference be supplied? (the claim that life expectancy varies by up to 19 years between boroughs does not seem to be borne out by ONS data).

Page: Chapter 1 Planning London's Future (Good Growth Policies)

Section: 1.0.4

- Paragraphs 1.0.4 to 1.0.6
Agree. These acknowledge the problems true to London at present and set the scene referring to economic factors as well as quality of life.

Page: Chapter 1 Planning London's Future (Good Growth Policies)

Section: 1.0.5

- Paragraphs 1.0.4 to 1.0.6
Agree. These acknowledge the problems true to London at present and set the scene referring to economic factors as well as quality of life.

Page: Chapter 1 Planning London's Future (Good Growth Policies)

Section: 1.0.6

- Paragraphs 1.0.4 to 1.0.6
Agree. These acknowledge the problems true to London at present and set the scene referring to economic factors as well as quality of life.

Page:	Chapter 1 Planning London's Future (Good Growth Policies)
Section:	1.0.8

- The economic argument is not holding true here. It needs to be balanced out with the financial viability of projects. Viability must be incorporated into projects much earlier.

  'Planning new developments' - To include redevelopment of existing homes/neighbourhoods and estates.

Page:	Policy GG1 Building strong and inclusive communities
Section:	1.1.4

Add in need to encourage cycling and walkability to promote healthy lifestyles.

Page:	Policy GG1 Building strong and inclusive communities
Section:	GG1

Generally the terms used in Policy GG1 are loose and require clarification. Appears as aspiration which sets the vision as opposed to being measurable policies.

A. 'other opportunities' - clarify what these include? E.g. SME's?

B. 'strengthen communities' - expand, e.g. public spaces and Town Centres.

F. 'avoiding separation or segregation' - spaces to be inclusive. Requires addressing the public-private space debate and ensuring that public spaces which are truly public are central to building inclusive communities. Designing public spaces which are adopted by councils and have funding mechanisms in place to ensure their maintenance and up keep will be integral in providing for all.

Page:	Policy GG2 Making the best use of land
Section:	1.2.2

Agree.

Page:	Policy GG2 Making the best use of land
Section:	1.2.3

Agree, but need to place emphasis on the support infrastructure (e.g. schools, GP's, transport provision such as bus frequencies) required for a growing population.

Page:	Policy GG2 Making the best use of land
Section:	1.2.6

Add in green infrastructure and reduction in pollution levels.

Page:	Policy GG2 Making the best use of land
Section:	GG2

D. Need to allow for targeted development within the metropolitan green belt where it reinforces growth strategies of regional and national significance. Where appropriate, targeted and compatible, mixed use development within the metropolitan green belt should be seen as part of a suite of measures that includes development of brownfield land, to address the chronic undersupply of housing delivery.

Within the Greater London boundary 22% of all land is designated as Green Belt. Some parts of the Green Belt are more accessible than others, but it includes many areas close to existing stations. Realising the potential of other areas may require investment in substantial new infrastructure. Some of the Green Belt is of great value and must remain fully protected. Green Belt designation does not imply beauty, public access or biodiversity. Only a fifth of London's Green Belt has an environmental status or is accessible to the public as green space.

A full land quality assessment register should be compiled for the Green Belt. Controlled release of appropriate bits of Green Belt could be an effective way to deliver substantial numbers of new homes. Super compensatory environmental mitigation measures as well as exemplar Design standards should be required for any development within the Green Belt.

E. Agree, however we should be striving for greater than 80% as cycling and walking need to be at the forefront of transport. In order to achieve this everything needs to be more localised so the proximity of work, to homes, to services and to supporting infrastructure becomes increasingly important.

Page:	Policy GG3 Creating a healthy city
Section:	GG3

Add in: mixed use communities are beneficial for mental health and well-being.

B/G. Add in: promote allotments, community gardens and grow your own initiatives which contribute to healthy food and healthy lifestyle choices, whilst also promoting a sense of community ownership within both existing and new developments. Rooftop spaces could be used for this type of activity.

Page:	Policy GG4 Delivering the homes Londoners need
Section:	1.4.4

'Boroughs can rely on these targets' - change this to 'Boroughs should address these targets'.

Page:	Policy GG4 Delivering the homes Londoners need
Section:	1.4.6

Agree with Build to Rent.

Page:	Policy GG4 Delivering the homes Londoners need
Section:	GG4

The policy does not consider what the tools are to ensure that the targets are being met, or if there is a support mechanism in place if targets are not met. The chapter should include this, or refer the reader to further policies/guidance documents where this information is available.

B. Link this to financial viability, and refer to the paragraph/policy which states the approach that should be taken where 50% affordable housing is not viable.

E. Agree.

Page:	Policy GG5 Growing a good economy
Section:	1.4.10

'growth in town centres across London will be equally important' - Add in the importance of the High Street to town centres and their economy.

Page:	Policy GG5 Growing a good economy
Section:	GG5

Agree with all.

Add in: a statement about the need for more flexibility in planning which would allow for creative industries and start-up companies. Planning needs to be able to accommodate more flexible land use and not just stick to strict land use designations.

Add in: digital connectivity and digital infrastructure - London will need to catch up with some other global cities in terms of high speed internet etc.

Page:	Policy GG6 Increasing efficiency and resilience
Section:	1.5.5

Agree.

Page:	Policy GG6 Increasing efficiency and resilience
Section:	GG6

C. 'Create a safe and secure environment which is resilient against the impact of emergencies including fire, terrorism **and flooding**.'

D. Mention the term Smart Cities. It has been included in the proceeding paragraphs (1.5.5) but not explicitly translated into policies.

Page:	Introduction to Chapter 2
Section:	Figure 2.1

Diagram is complicated and requires simplification - perhaps the layers can be broken down and shown on separate layers in a series of supporting diagrams.
The colours on the diagram for the opportunity areas are difficult to read.
The diagram also needs to show the hierarchy of key locations, opportunity areas etc. and demonstrate the 'corridor' relationships that are happening within London.

Page:	Introduction to Chapter 2
Section:	2.0.1

- Paragraphs 2.0.1 to 2.0.3
  Whilst this is intended to provide an overview to the section, there could be a problem statement or more specific context prior to or within this?

Page:	Introduction to Chapter 2
Section:	2.0.2

- Paragraphs 2.0.1 to 2.0.3
  Whilst this is intended to provide an overview to the section, there could be a problem statement or more specific context prior to or within this?

Page:	Introduction to Chapter 2
Section:	2.0.3

Paragraphs 2.0.1 to 2.0.3
Whilst this is intended to provide an overview to the section, there could be a problem statement or more specific context prior to or within this?

Page:	Introduction to Chapter 2
Section:	2.0.5

'beyond London's boundaries' – beyond zone 9 should also be considered

'collaboration' - add more information here: closer working relationships and joint ventures would help. Taking a more regional approach or focus will be integral in achieving successful cross-borough collaboration.

Page:	Introduction to Chapter 2
Section:	2.0.6

Add in the value of High Streets.

Page:	Policy SD1 Opportunity Areas
Section:	SD1

- Policy SD1 A3

  Agree

- Policy SD1 A4
  Agree, particularly as TfL are often involved in the design process too late.

- Policy SD1 B9
  Add in: 'ensure planning frameworks are subject to public and stakeholder consultation' at early stages of the planning process, in order to get their support and buy-in. [This is particularly important for land owners within the site or adjacent to the site].

Page:	Central London
Section:	Figure 2.11

Diagram is too busy and requires simplification. Legend also required.

Page:	Policy SD1 Opportunity Areas
Section:	Figure 2.2

Good diagram.

Page:	Policy SD1 Opportunity Areas
Section:	2.1.5

Agree.

Page:	Policy SD1 Opportunity Areas
Section:	2.1.6

Agree.

Page:	Policy SD1 Opportunity Areas
Section:	2.1.7

Agree.

Page:	Policy SD1 Opportunity Areas
Section:	2.1.8

Agree.

Page:	Policy SD1 Opportunity Areas
Section:	2.1.9

Agree.

Page:	Policy SD1 Opportunity Areas
Section:	2.1.10

Agree.

Page:	Policy SD1 Opportunity Areas
Section:	2.1.11

Agree.

Page:	Policy SD1 Opportunity Areas
Section:	Figure 2.3

The location of this key in the document is confusing, it needs to be moved the a more relevant page and ideally the key should be on all pages where the diagram requires this key to be able to interpret and understand what the diagrams are trying to show - diagrams on pages 34, 37, 40, 44, 48, 50, 52, 54 and 56.

Page:	Policy SD2 Collaboration in the Wider South East
Section:	SD2

Policy SD2 A, B and C.
Agree with the policies, however, a regional planning focus will be important in order to tackle the issues identified in policies A, B and C.

Page:	Policy SD3 Growth locations in the Wider South East and beyond
Section:	SD3

Agree.

Page:	Policy SD3 Growth locations in the Wider South East and beyond
Section:	Figure 2.15

Agree with this diagram. Extend beyond the area shown in the map, to include Bristol in the South-West.

Page:	Policy SD4 The Central Activities Zone (CAZ)
Section:	SD4

F. Whilst the international economies of scale are important to London, there is also a local economy and London must ensure that is retains the contrast and mix in characters and economies of scale.

Page:	Policy SD4 The Central Activities Zone (CAZ)
Section:	Figure 2.16

Questioning whether the two international Town Centres identified on this map are actually of the same weight in the city's economy?

This map overlooks the importance of the economy in the east of the CAZ. Shoreditch, for example, is a gateway to the CAZ in the east and the London Plan should promote this, encourage the development of the east and show aspirations for places like Shoreditch to raise their profiles further.

Although outside of the CAZ, Stratford similarly has an important role.

Perhaps this diagram is focussing on traditional perceptions of the economies and overlooking the younger perception of the city?! I.e. it is focussing on the west end as opposed to the east?

| Page: | Policy SD4 The Central Activities Zone (CAZ) |
| Section: | 2.4.14 |

Agree.

| Page: | Policy SD4 The Central Activities Zone (CAZ) |
| Section: | 2.4.15 |

Agree.

| Page: | Policy SD4 The Central Activities Zone (CAZ) |
| Section: | 2.4.16 |

Agree.

Page:	Policy SD4 The Central Activities Zone (CAZ)
Section:	2.4.17

Agree.

Page:	Policy SD4 The Central Activities Zone (CAZ)
Section:	2.4.18

Agree.

Page:	Policy SD5 Offices, other strategic functions and residential development in the CAZ
Section:	SD5

A. Agree
B. Not convinced by this as mixed use development can be very successful. We would need to see the plans.

Page:	Policy SD5 Offices, other strategic functions and residential development in the CAZ
Section:	2.5.8

Agree.

Page:	Policy SD6 Town centres
Section:	SD6

Agree.

Page:	Policy SD6 Town centres
Section:	2.6.3

The fact that trip journeys for home deliveries has increased significantly, raises the question as to whether we need to constrain the delivery times in certain areas of the city to reduce vehicular traffic and congestion which is heightened by deliveries.

Page:	Policy SD6 Town centres
Section:	2.6.4

Agree.

Page:	Policy SD7 Town centre network
Section:	SD7

C. This is good as it is keeping control of the wider vision. However, has this been consulted on with all of the Boroughs?

E. District centres must also focus on the provision of social infrastructure and integrating arts and culture into their economies.

Page:	Policy SD7 Town centre network
Section:	Figure 2.18

Overall, this is a poor quality diagram - the colours combination is not good (particularly for colour blind readers), the boxes of bullet points need a frame around them, and it has a lot of information squashed into a small area. However, the green illustrations are useful in showing the different classifications.

General comment:

Add in a reference to the importance of the public realm and streets in town centre development. Also mention that retaining existing features of town centres, such as market places, can contribute to the character of the town centre.

Historic conservation is also important to address because so many Towns or High Streets are historic or have important historical assets. For example Policy SD8 may include a statement such as ' New development must address, respond to and strengthen the character of the existing Town Centre'.

Specific comments:

A.1. Whilst this is important, Development Plans should ensure that they respond to the direct and surrounding context of the Town Centre.

B.3. This is good as it is taking account of the transition zones - perhaps this area can be referred to as the transition zone?

B.4. The policy should mention how suitable town centres are for older people who are downsizing, as they would be close to local amenities. Add into 4 (d): 'planned or potential transport improvements – to indicate future capacity for intensification' **including housing for independent older people.**

B.5. (d) The London Plan should support the policy by mentioning differing innovative building typologies that could help to deliver residential uses above existing commercial, social infrastructure and transport infrastructure uses. These typologies should be of different densities and may include types such as flexible live-work units.

B.6. Agree - very important.

Page: Policy SD9 Town centres: Local partnerships and implementation

Section: SD9

Support - Agree.

Page: Policy SD9 Town centres: Local partnerships and implementation

Section: 2.9.1

Town centre strategies to consider how individual towns fit into the hierarchy of town centres within the London Plan, and how the towns needs are prioritised. Add in a reference to the hierarchy of town centres.

Page: Policy SD9 Town centres: Local partnerships and implementation

Section: 2.9.2

Support - Agree.

Page: Policy SD9 Town centres: Local partnerships and implementation

Section: 2.9.3

Key stakeholders should be involved in this process at early stages. This should include both engaging and non-engaging stakeholders, and local and small businesses.

Page: Policy SD10 Strategic and local regeneration

Section: SD10

Add in: release land for integrating smaller businesses (SME's) and start-ups in to Town Centres.

Page: Policy SD10 Strategic and local regeneration

Section: 2.10.2

Add: 'such as providing affordable workspace, creating more accessible and welcoming public realm, or investing in training and employment opportunities for local residents' and supporting SME's
'Where proposed large-scale development in Areas for Regeneration should seek to reduce spatial inequalities and provide public facilities and infrastructure such as schools, other educational institutions, health facilities etc.

| Page: | Policy SD10 Strategic and local regeneration |
| Section: | 2.10.3 |

'Successful regeneration requires all stakeholders to operate in a collaborative way, pooling resources and creating partnerships…' Agree. Add in a statement in Policy SD10 to reflect this.

| Page: | Policy SD10 Strategic and local regeneration |
| Section: | 2.10.6 |

'identify, protect and promote the places and spaces that are particularly valued by local communities…' Agree. This also needs to be reflected in Policy SD10.

| Page: | Policy D1 London's form and characteristics |
| Section: | 3.1.9 |

We recommend adding a sentence to emphasise the importance of well-considered and durable structure to maximise future flexibility and longevity.

Page:	Policy D1 London's form and characteristics
Section:	3.1.11

We question whether large scale developments do present more opportunities for innovative design that avoids waste etc. Smaller developments can make use of salvaged material more easily for example.

Page:	Policy D1 London's form and characteristics
Section:	3.1.12

We welcome the support for the circular economic model.

We would suggest that the phrase 'best use of the land', is explained to ensure that this is not interpreted as simply maximising development. 'Best social value' or, most 'appropriate' use of land, may be better.

Page:	Policy D1 London's form and characteristics
Section:	3.1.4

We recommend the protection of existing levels of open space and specific mechanisms for encouraging the creation of new open spaces.

In general, we would recommend the use of more positive wording when describing built space and the power of high quality design, and how good design can add value to a place. For example 'Buildings will enrich the city for many years, therefore a long-term perspective should be taken'.

A number of the policies are vague /obvious and difficult to address subjectively, for example:

D1A 2) Facilitate an inclusive environment

D1A 4) Deliver an appropriate outlook, privacy and amenity

D1A 5) Achieve safe and secure environments

D1B 2) (development design should) be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan, through appropriate construction

D1B 3) Aim for high sustainability standards

D1B 6) Achieve confortable and inviting environments both inside and outside buildings

Page:	Policy D2 Delivering good design
Section:	D2

We welcome the engagement process recommended in Part C, and we would emphasise that it is important to discuss building character and architectural design as early as possible in the process.

Page:	Policy D2 Delivering good design
Section:	3.2.1

We would suggest that the phrase 'most efficient use of land' is reworded as this implies undue emphasis on financial return. Alternatively 'efficiency' could be defined to include social.

Page:	Policy D2 Delivering good design
Section:	3.2.7

Design reviews should be mandatory across all London Boroughs, preferably through borough specific Design Review Panels, but where these do not exist, through CABE or UDL.

Most schemes need more than one review and the process should also allow for a post-planning review to secure the quality of the built proposals.

Boroughs should arrange training in 'design understanding', specifically for councillors.

Page:	Policy D2 Delivering good design
Section:	3.2.10

Support - We strongly support this proposal. In our experience design quality can really suffer where the architect is not retained post-planning. Ideally this returns to being a routine expectation of retention, avoiding the need for enforcement which could create tensions in the on-going relationship.

Page:	Policy D3 Inclusive design
Section:	D3

We question whether this policy is needed at all as inclusive design it is one of the Good Growth Principles. However, to uphold this the principle Policy H2- G (small sites) should be rephrased to only consider a relaxation of Category 2 where apartments are concerned, and it is not possible to provide enough flats (we suggest 15) to make service charges viable. Cross-referencing, in this case to 3.5.6 would be useful here and elsewhere.

Page:	Policy D4 Housing quality and standards
Section:	D4

This only touches on a few aspects of housing design and quality, leaving out many others. We suggest that this section, and all other housing-related elements of Chapter 3, are relocated to Chapter 4 – Housing.

We suggest that it is noted that a mix of housing typologies and building typologies should be encouraged in new developments.

We are fully supportive of the space standard but do not believe it should be reproduced in the document as it is outwith the GLAs control. We have some minor queries which we would like the GLA to resolve with the Government:

Private Internal Space, Part 6 - When counting a portion of reduced head height as storage; it's not clear whether to include this in GIA.

Private Internal Space, Part 7 - The built in wardrobe is likely to reduce the width to less than 2.75m width, where the room is rectangular - so this is very difficult to achieve. It is worth remembering that a freestanding wardrobe would reduce the room width the same.

We suggest the following addition to the text: 'a portion of storage should be accessible from shared areas of the dwelling, and. not all located solely within one of the bedrooms.'

Page:	Policy D4 Housing quality and standards
Section:	Table 3.1

It is confusing that while areas with a head height below 1.5m count for storage, they do not count towards GIA.

Page:	Policy D4 Housing quality and standards
Section:	3.4.3

While we support this policy in principle, our understanding is the GLA is not permitted to make changes to the NDSS. If permission can be obtained for an exception in London, or the NDSS can be upgraded to require 2.5m ceilings, it would be helpful to specifically require a minimum of 2.5m in habitable rooms (subject to localised boxing where this cannot be avoided) and define a lower minimum ceiling height (say 2.3m?) for the remaining spaces.

Page:	Policy D4 Housing quality and standards
Section:	3.4.5

We suggest that this is more strongly worded, and that limiting the percentage of single aspect dwellings (perhaps to a maximum of 20%) should be considered.

Page:	Policy D4 Housing quality and standards
Section:	3.4.6

We suggest the inclusion of a recommendation to ensure the private open space is suitable for likely residents (e.g. families?) and location (e.g. what storey of the building is the amenity at?).

We recommend adding winter gardens to the list of suitable amenity spaces.

Page:	Policy D4 Housing quality and standards
Section:	3.4.8

'Same external appearance' should be rephrased to say that, 'there should be no discernable qualitative difference externally'.

Page:	Policy D5 Accessible housing
Section:	D5

We suggest that this section is fully integrated with inclusive design and relocated to Chapter 4 – Housing.

Page:	Policy D5 Accessible housing
Section:	3.5.2

This duplicates Building Regulations and should not be in planning policy because that implies assessment at planning stage.

Page:	Policy D5 Accessible housing
Section:	3.5.5

This duplicates Building Regulations and should be removed.

Page:	Policy D5 Accessible housing
Section:	3.5.7

The first half of this paragraph is unnecessary.

Page:	Policy D6 Optimising housing density
Section:	N/A

We suggest that this section is relocated to Chapter 4 – Housing

D6A   Need to ensure that 'optimise' is not interpreted as 'maximise' – we note that this is one of the few instances where 'must' is used and refusal is recommended where optimisation has not been achieved. While it is not helpful to dictate density, it would be reasonable for an LPA to suggest the acceptable height range for any given site. It would also be useful to provide a model approach to determining the capacity of a site.

D6B   Who is responsible for assessing existing and planned infrastructure? It is unrealistic to expect designers to be aware of planned roads or the spare capacity of local schools and other services – when assessing housing need and identifying sites LPAs must also assess infrastructure and that information should be made available. Although the scale/size of development is relevant, even 10 more children (potentially just 3 family flats) is a problem if schools are full.

D6B   All schemes need careful scrutiny; some low density schemes are poor quality. Will DC officers know a good management plan from a bad one? They are likely to be generic and may not be implemented in practice. These seem very arbitrary thresholds and could lead to developers keeping just below them to avoid scrutiny.

D6D 2) Habitable rooms should not be used unless the term can be tightly defined.

Page:	Policy D6 Optimising housing density
Section:	3.6.3

Elsewhere it is states that development should be proportionate to the existing infrastructure that support it. However, transport infrastructure is treated as a special case where developments should take both existing and future capacity into account. This could result in developments that stress existing transport infrastructure for a long period of time awaiting new transport which may not materialise. We suggest that a review mechanism is put in place to ensure that this allowance is not abused.

Page:	Policy D6 Optimising housing density
Section:	3.6.9

A range of model examples of density calculations on different types of sites should be included in the Housing SPG and cross-referenced here.

Page:	Policy D6 Optimising housing density
Section:	3.6.10

The measurement of maximum height needs more thought – 'major component' is ambiguous. Applicants should also be required to indicate heights on plans and elevations.

Page:	Policy D7 Public realm
Section:	D7

D7A   'Highest quality of design' is a big ask and very difficult to assess.

Page:	Policy D7 Public realm
Section:	3.7.2

Not all buildings that frame public realm spaces can be multi-functional – should this apply to major spaces only?

Page:	Policy D8 Tall buildings
Section:	N/A

We question whether it makes sense to define generic policies for tall buildings if 'tall' is defined by each borough?

Tall Building locations should be agreed in Development Plans which are agreed across Borough boundaries.

Page:	Policy D8 Tall buildings
Section:	3.8.2

There is a huge difference between 25m (up to 8 storeys) and 150m (up to 50 storeys) – surely anything more than 30m is 'tall' wherever it is?

Page:	Policy D9 Basement development
Section:	D9

D9 A   This is very vague.

Page:	Policy D9 Basement development
Section:	3.9.2

The meaning is unclear of this sentence is unclear:

'Where basement developments cause particular harm, boroughs can consider introducing Article 4 Directions to require smaller-scale proposals to obtain planning permission.'

Page:	Policy D10 Safety, security and resilience to emergency
Section:	N/A

Technical issues should not be included in planning policy.

Page:	Policy D11 Fire safety
Section:	N/A

This policy need to be removed, it confuses the regulatory process and cuts across Building Control regulations. It is worth noting that fire standards are currently under review.

Page:	Policy D13 Noise
Section:	N/A

On very noisy sites, mechanical ventilation is sometimes the only way to mitigate overheating in summer.

Page:	Policy H1 Increasing housing supply
Section:	4.1.2

Local Authorities across London have neither the capacity nor adequate skills to deal with thousands of new planning applications to support increased housing delivery on the scale envisaged. Without this, any investment post planning is wasted. There needs to be specific re-skilling for those appraising planning applications and discharging conditions - this will require investment in staffing.

Page:	Policy H1 Increasing housing supply
Section:	4.1.3

Whilst we welcome a focus on an increased supply of housing, meeting targets should never be to the detriment of the design standards set out in Chapter 3.

Page:	Policy H1 Increasing housing supply
Section:	4.1.4

The construction industry requires specific training programs for emerging technologies such as offsite, manufacture and these need to be widely adopted.

Page:	Policy H1 Increasing housing supply
Section:	4.1.5

To achieve this Local Authorities will require training spanning the full process of commissioning, designing, constructing, maintaining and managing housing (both existing and new housing stock).

Page:	Policy H2 Small sites
Section:	H2

The threshold for small sites given in part D is 25 homes, not the usual 10, this is explained in para 4.2.3 but will cause confusion in terms of government policy. We suggest this is added to the glossary of terms.

Part D needs a stronger emphasis on the quality of design, its scrutiny and the importance of an appropriate scale of development - for example on sites within, or adjacent to, conservation areas.

We question why estate regeneration is included in the exclusions list in Part F for small site development, when infill development could be an obvious means to deliver under 25 units. A definition of regeneration would be useful.

Page:	Policy H2 Small sites
Section:	4.2.5

This paragraph could include specific encouragement for roof top extensions on small sites, using lightweight MMC technology; and could encourage several smaller developments within the same borough to be brought forward together to maximise development opportunities.

Page:	Policy H2 Small sites
Section:	4.2.6

Perhaps there is an opportunity to promote the use of existing design guides to set design standards, such as the NHF Housing Standards Handbook for example.

Page:	Policy H2 Small sites
Section:	4.2.8

Overlooking is not overcome merely by re-positioning windows. Homes and their internal layouts should be carefully planned to minimise overlooking and protect privacy. It is about good and appropriate design to avoid overlooking, not just mitigation when overlooking occurs.

Is community-led housing defined in the Glossary?

Local Authorities should be encouraged to sell land for a fixed price and then judge potential buyers by other "Best Value" factors such as social/ community value, design quality, environmental sustainability, contribution to local jobs/ economy. This is a standard process used in many cities in northern Europe.

When evaluating Best Value appraisals, many Local Authorities currently find it difficult to take into account other aspects of the development, other than solely financial Best Value, such as long-term place-making value, environmental and social sustainability. Guidance on this from the GLA would be beneficial, and would strongly support new entrants to the market.

A designated planning use class could be created for community-led development. This could be defined as 'land that can be developed only with the direct involvement of the end occupants of the dwellings'. This would allow smaller sites, or portions of sites, to be designated for community-led housing in Local Plans. It would create a separate and parallel land market for this type of housing, and would allow planners to plan for community-led housing without needing to actively own the land themselves. The GLA should aim to transfer suitable public land to CLTs wherever possible, or at least offer them the first option to purchase at sub-market value.

As long as community led housing is appropriately defined to lock in long-term affordability, the planning use class could allow it to be incentivised by being exempt from CIL. This could encourage large developers to develop a site with other partners, e.g. community groups/ smaller developers.

Neighbourhood Plans could be used to identify sites suitable for community-led development which could then feed into the Local Plan.

All Local Authorities should be required to have Local Plan in place, and should include policies on community-led housing.

Page:	Policy H2 Small sites
Section:	4.2.11

We agree with this statement, but the reverse should also be resisted where subdivision results in sub-standard flats.

Page:	Policy H3 Monitoring housing targets
Section:	H3

We are dissatisfied with the proposal, under Part D, that each bedroom in a care home should be counted as a single home. A ratio of 2:1 might be more suitable. We would emphasise that it is important that they (and other types of non-self-contained accommodation) are separately identified in statistics – including completions and density.

We would recommend that planning use class C2 be redefined as non-self-contained accommodation and include care homes and shared living. This would allow appropriate standards to be set for their design. Though shared living housing is intended to be short term, without safeguards to ensure this, we are concerned that they may become long term homes, possibly even for families, hence the desire for them to be properly recognised, and not left to Sui Generis.

Page:	Policy H3 Monitoring housing targets
Section:	4.3.3

It should be noted that non self-contained accommodation is not comparable or equivalent to normal housing stock so should be subject to different standards.

Page:	Policy H4 Meanwhile use
Section:	H4

Meanwhile Housing appears to be Temporary Housing, rebranded. Any temporary housing needs much more quality control than is defined in this policy. Specific standards and timescales are needed to avoid the substandard, permanent pre-fabs of previous eras.

Page:	Policy H4 Meanwhile use
Section:	4.2.3

The time period for "meanwhile" homes is too ambiguous and open to abuse - perhaps it should be linked to a particular development and site phasing strategy, or a maximum number of months, with an option to request an extension.

We would also recommend that more detail is provided in this policy in terms of what groups of people it might be suitable for.

We would recommend borough-wide or sub-regional coordination of this type of provision. If prefabricated and moveable, temporary homes could be GLA owned and rented out to boroughs very cheaply. This could also encourage reasonable quality standards.

Page:	Policy H5 Delivering affordable housing
Section:	H5

If the acceptable minimum provision of affordable housing, under H6-B-1, is 35%, a policy requirement (even a strategic one) for 50% is at best confusing. We are regularly asked to confirm that our designs meet all London Plan policies, and it is bewildering to clients when we explain that due to inconsistencies between policies, this cannot always be achieved and we need to produce a disclaimer. Policies should be distinct from targets and should be generally expected to be met in full.

Page:	Policy H5 Delivering affordable housing
Section:	4.5.4

We strongly support the direction of travel of this policy. We note, however, that in setting aside only 35% of housing for 'affordable' dwellings, under H6, B,1 – and recognising that these are required for those on household incomes of up to £90,000, we are still facing a situation whereby 65% of the housing that we build is not affordable to the majority Londoners.

Page:	Policy H5 Delivering affordable housing
Section:	4.5.5

We suggest that guidance is provided as to how off site contributions should be monitored so a standard approach is taken across boroughs.

Page:	Policy H6 Threshold approach to applications
Section:	4.6.2

To avoid saturation of the system and repeated attempts at reducing affordability on the same site; once a viability test has been made via the "Viability Tested Route" for a particular site, then perhaps it should be made public and its conclusions become binding for a minimum number of years?

We would recommend standardising guidance for responding to post-planning viability reviews, which attempt to value engineer projects, so this is the same across boroughs. Any post planning changes should be part of the transparent reporting process.

Page:	Policy H6 Threshold approach to applications
Section:	4.6.3

We would recommend using bedspaces as opposed to habitable rooms since this is less open to interpretation, and forms part of the dwelling description. A definition of habitable floor space is required, so that either approach is consistent between boroughs.

Page:	Policy H6 Threshold approach to applications
Section:	4.6.6

It should be noted that industrial sites are often more expensive to redevelop, and may be less viable with the 50% affordability threshold.

Page:	Policy H6 Threshold approach to applications
Section:	4.6.9

Clearer guidance is required on which projects will attract public subsidy. Does this include any estate that an RSL is involved in whether or not they have done grant-funded work on the estate?

Page:	Policy H7 Affordable housing tenure
Section:	4.7.13

We believe that the 75% affordable housing level to avoid viability is too high to act as an incentive, since not many schemes will be near that threshold. We would recommend 60 or 65% but suggest that at least 20% should be available at social rent.

Page: Policy H8 Monitoring of affordable housing

Section: 4.8.1

We would recommend standardising monitoring formats across boroughs.

Page: Policy H9 Vacant building credit

Section: 4.9.1

Rather than a "Vacant Building Credit"… the GLA could consider a "Vacant Building Tax" on buildings or sites vacant for more than 5 years without active marketing. This would discourage "land banking" and encourage landowners to put sites forward for development.

Page: Policy H10 Redevelopment of existing housing and estate regeneration

Section: H10

Replacement of equivalent floorspace seems poorly defined and open to interpretation – is this net, gross, GIA, etc ?

If affordable home uplift is to be maximised, this may prevent investment in other improvements to public realm or community facilities which are often essential to regeneration schemes. We suggest this is rephrased. The aim should be to optimise density (as with other developments), and that could conceivably result in fewer homes, particularly if a new community facility is a higher priority.

It should be noted that there may be instances where properties have been vacant over a long period which arguably should be excluded from this test.

Page:	Policy H10 Redevelopment of existing housing and estate regeneration
Section:	4.10.4

Regeneration schemes with uplift should only be supported if they replace not only the affordable housing but also maintain or re-provide existing communal facilities & services contained on the site.

Re-provision strategies should be developed and approved by residents early in the design development.

We support the proposal that there should be no net loss of affordable homes, however, we question why estate regeneration projects should have to do the viability test even where they meet the other exclusion criteria. If there is no net loss of units and a high level of affordable provision in any uplift, a viability report would only add unnecessary financial burden. We suggest the uplift on schemes should be dealt with as per any other development, eg.: over 50% affordable on uplift would not trigger a viability statement. However, if this is proposed because the GLA wishes developers to be completely open and transparent with residents, or to ensure that residents' interests are protected, we agree that it would be fair to require the viability test.

Page:	Policy H11 Ensuring the best use of stock
Section:	4.11.1

It is not clear how this policy will work in practice. What mechanisms are envisaged to establish and monitor the number of vacant dwellings? Have any boroughs had any success in this regard?

Page:	Policy H11 Ensuring the best use of stock
Section:	4.11.2

This approach to "Holiday Rental" is far too lenient. 90 days a year is too much but the fact that it is impossible to police effectively is an even greater problem. The effect this has on the rental sector is dangerous and can result in far less reasonably priced rents in a particular area. Lessons should be learned from cities such as Berlin and Barcelona in this regard.

Page:	Policy H12 Housing size mix
Section:	H12

At the moment it is not clear how "Downsizers" is being incentivised (part 9) as potentially their needs overlap with those of first-time buyers who enjoy stamp duty breaks, Help to Buy and other incentives, putting them at an advantage.

Page:	Policy H12 Housing size mix
Section:	4.12.2

If housing mix responds to a particular site rather than borough's need, there is a danger that the drive commercially would be for ever smaller units. A standard mechanism would be needed for appraising housing need on a site by site basis, in order to avoid a race to the bottom. This could also lead to a failure to meet borough-wide need.

Page:	Policy H12 Housing size mix
Section:	4.12.3

A couple with one child should be classed as a family. Relatively few families now comprise more than two children so as long as the bedrooms are doubles, two will often be adequate for their needs too. We would recommend changing the definition of family housing to 2 bedrooms or larger.

Page:	Policy H12 Housing size mix
Section:	4.12.4

Downsizing should be considered as part of the Local Authority development plan across the borough and not on individual developments.

Page:	Policy H12 Housing size mix
Section:	4.12.5

We would suggest that this needs stronger control to resist commercial pressures for small units and we would recommend that no more than 10% of the total is comprised of 1b1p.

Page:	Policy H13 Build to Rent
Section:	H13

Access to the basic communal facilities in a scheme, such as any social spaces and external areas, should be maintained as an equal benefit to affordable rent tenants. There is a danger that these tenants might be treated differently where not controlled via either policy or the management plan.

There is no mention of required housing mix needed to obtain "build to rent" status, and we would encourage this to be defined. This is important because of the demographic mix that could be attracted to this type of product. There is a danger that smaller units are favoured over larger ones in single developments.

A number of design standards are being bypassed in the design of current Build to Rent accommodation, including minimising the number of single aspect flats, provision of private external amenity etc. The principle of tenure neutral design is therefore already severely compromised. The effects of this are exacerbated because an increasing number of Build to Rent units are lived in by families. Build to Rent should meet all other residential design standards (e.g. space, organisation and amenity). Thousands of sub-standard homes have already been created by the PRS market through permitted development, and this must be stopped.

The covenant of 15 years (under Part B2) seems too short. We would recommend a minimum of 25 years, ideally more, otherwise investors will just sell off after 15 years when developments start to need major work.

We strongly welcome the proposal for longer tenancies under Part B6. Longer tenancies are likely to result in more stable rents and fewer unsustainable price increases and enable renters to begin to consider their home as a place to live for the long term. Longer tenancies engender a sense of ontological security that has proven long term benefits to health and well-being. We would urge that 3 year tenancies be offered to tenants at no extra cost than a 1 year tenancy, to encourage take-up.

Deposits and rent-in-advance (described in Part B10), should be limited e.g.: max 2 month deposit and/or 1 month in advance, otherwise these risk being abused and effectively charged in lieu of fees.

Page:	Policy H13 Build to Rent
Section:	4.13.4

We strongly support this approach, and would recommend that this it is strengthened, so that rents may not be over London Living Rent levels, unless backed by a viability argument.

Page:	Policy H13 Build to Rent
Section:	4.13.6

We question why the affordable split in this housing type is less onerous than general needs housing, with no social rent requirement. We suggest that, of the affordable provision, a minimum of 60% should be London Living Rent, and not 30%.

Page:	Policy H13 Build to Rent
Section:	4.13.10

It is not clear how the clawback mechanism would be monitored and what process is to clawback affordable housing contributions.

Page:	Policy H14 Supported and specialised accommodation
Section:	H14

It would be useful if a definition of supported and specialised accommodation could be provided in the glossary. For instance, is unclear whether this type included short term emergency housing, hostels or re-ablement housing.

We welcome that fact that 're-ablement' accommodation is specifically mentioned as a type of housing, this type of bespoke short term housing can remove the need for this to be provided in B&Bs / Hotels etc which are very expensive for local councils.

Page:	Policy H17 Purpose-built student accommodation
Section:	4.17.3

We are concerned that this point permits some bedrooms to be used by people other than students. The term "majority" is too loose, meaning the limit is ambiguous, and open to abuse.

Page:	Policy H17 Purpose-built student accommodation
Section:	4.17.5

We strongly suggest that 'adequate functional living space' be better defined. The phrase is too vague, and open to abuse.

Page:	Policy H18 Large-scale purpose-built shared living
Section:	H18

This type of housing should be formalised to allow standards for space, accessibility, energy, soundproofing, amenity, environment etc. to be introduced. Paragraph A.6. is too vague. We would also welcome strengthening this policy to prevent office conversions to this type of accommodation.

This policy is compelling shared-living to require a large, institutional, heavily serviced building; adding cost and becoming just like student housing but for an unspecified period – possibly permanent. Smaller scale, time-limited, affordable, purpose-built 'mansion blocks' with up to 20 bedsits (preferably 6-12) with a shared ground floor Living Dining Kitchen, utility room and a roof terrace would be more appropriate; or groups of bedsits with access to similar shared facilities within an ordinary apartment block.

Page:	Policy H18 Large-scale purpose-built shared living
Section:	4.18.1

Use Classes generally and Use Class C (Dwelling Houses) in particular, need a complete update and the GLA should work with DCLG to achieve this. If micro-homes and non-self-contained dwellings are to be permitted they should be formally part of Use Class C, (which already includes hostels, hotels, army barracks etc.) not classed as Sui Generis. Large scale purpose built living should be a new sub set of C class, which would allow boroughs to put in place needs assessments to limit developments across the borough.

Page:	Policy H15 Specialist older persons housing
Section:	H15

There is no mention of the design or quality recommendations in the HAPPI Report as a basis of design quality. This is used so widely now as a benchmark that the omission is surprising.

A clearer guide to what constitutes a suitable level of scooter provision would be useful. While we recognise that cycles and scooters need different kinds of storage and different access arrangements, it would be prudent to permit resident cycle provision to be replaced by resident scooter provision (where resident needs demand it), as long as staff and visitor cycle and scooter spaces are also provided.

Page:	Policy H15 Specialist older persons housing
Section:	4.15.2

It is positive that downsizing is identified as a specific issue, but this clause is too vague as to how mainstream developments can also cater for older people.

Page:	Policy H15 Specialist older persons housing
Section:	4.15.3

While we welcome this type of housing being more clearly defined in terms of use classes - grouping sheltered and extra care as C3 housing means that these struggle to compete with general needs housing when sites are purchased. Either new use classes should be created C3a, C3b etc. which can then have specific policies applied to them locally to promote their use, or local development plans should identify specific sites suitable only for this type of accommodation over other forms of C3.

We note that if extra care is defined as C3 class, all normal housing standards apply. The nationally described space standard isn't big enough, in our experience for extra care or even sheltered housing (now generally called retirement housing) and both should be designed somewhere between Part M Category 2 and Category 3.

Page:	Policy H15 Specialist older persons housing
Section:	4.15.4

The target figures quoted are based on assumptions that a very low proportion of older people will require specialist housing, however we believe the figures should be based on providing more choice across different tenures, rather than just meeting a minimum need, particularly if one approach to solving general housing need is to free up under-occupied family houses by giving the opportunity to older people to live in more appropriate accommodation. Providing more of the right kind of accommodation would also stimulate demand.

Page:	Policy H15 Specialist older persons housing
Section:	4.15.9

There is plenty of guidance on designing for people living with dementia, and we would be happy to signpost authors to this evidence, and would recommend that it is specifically referenced here.

We would advocate that all dedicated elderly housing, as well as adult care homes, be designed to be fully accessible and to a minimum basic dementia friendly design approach and that mainstream housing also takes some account of the needs of people living with dementia.

Page:	Chapter 5 Social Infrastructure
Section:	N/A

We have not provided comments on Chapter 5 (Social Infrastructure) but would like to express strong support for the concept of local community hubs; multi-purpose facilities that support multigenerational, multicultural interaction. Such facilities can be a first port of call for those in need of help, advice or information (providing contact details of local charities, organisations and services), provide onsite facilities such as health checks, podiatry, exercise classes, sport, music and dance, safe play, affordable child care, adult day care, after school care, evening classes and coordinate outreach services such as meals-on-wheels and social care. All of this helps to build a sense of community, encourage participation and mutual support, improve health and reduce loneliness.

Page:	Policy G2 London's Green Belt
Section:	G2

There is a need to allow for targeted development within the metropolitan green belt where it reinforces growth strategies of regional and national significance such as the London to Cambridge growth corridor. Where appropriate, targeted and compatible, mixed use development within the metropolitan green belt should be seen as part of a suite of measures, that includes development of brownfield land, to address the chronic undersupply of housing in London and the wider south east of England.

Within the Greater London boundary 22% of all land is designated as Green Belt. Some parts of the Green Belt are more accessible than others, but it includes many areas close to existing stations. Realising the potential of other areas may require investment in substantial new infrastructure. Some of the Green Belt is of great value and must remain fully protected. Green Belt designation does not imply beauty, public access or biodiversity. Only a fifth of London's Green Belt has an environmental status or is accessible to the public as green space.

A full land quality assessment register should be compiled for the Green Belt. Controlled release of appropriate bits of Green Belt could be an effective way to deliver substantial numbers of new homes. Super compensatory environmental mitigation measures as well as exemplar Design standards should be required for any development within the Green Belt.

Page:	Policy G4 Local green and open space
Section:	G4

- D - strengthen wording to read '*The loss of green and open spaces should be avoided. If losses are proposed, equivalent or better quality provision should be made within the local catchment area unless an up-to-date needs assessment demonstrates this is unnecessary.*'
- E (2) - fully support requirement to plan for future green and open space in areas of change.

Page:	Policy G5 Urban greening
Section:	G5

- A - concern over 'green wall' reference - green walls are frequently seen to fail and are high cost items which require onerous maintenance requirements. Emphasis should be on elements which will endure and offer longevity without being 'token' purchases.
- B - suggest target scores need to be assessed by a suitability qualified professional to ensure accuracy and validity.

Page:	Policy G5 Urban greening
Section:	8.5.1

Emphasis on design teams including relevant professionals to adequately consider urban greening measures including ecologists and landscape architects.

Page:	Policy G5 Urban greening
Section:	8.5.2

Suggest inclusion of potential financial benefit of urban greening/biodiversity (akin to that expressed for tree cover in Para 8.7.3) to demonstrate appeal and benefit to commercially-minded clients and organisations.

Page:	Policy G5 Urban greening
Section:	Table 8.2

Concern over lack of detail, definitions and examples noted. Suggest SPG specifically to cover this in further detail, including process of evaluation - again cite need for suitability qualified professional to ensure accuracy and validity of assessment. Examples:

- 'standard trees planted in natural soils or in connected tree pits' - further detail required to differentiate between 'good' and 'bad' tree pit approaches.
- 'hedges (lines of mature shrubs one or two shrubs wide) - see RHS for guidance' - this is too specific and does not allow for most common forms of hedge planting.
- 'Groundcover planting' - again too general.

Page:	Policy G6 Biodiversity and access to nature
Section:	G6

- Concern over lack of reference within B (3) to local authority and regional Biodiversity Action Plans (BAPS).
- D - suggested amended wording to: 'Proposals to demonstrate actions taken to enhance biodiversity should be made available from the start of the development process with consultant teams including suitably qualified landscape architects and ecologists.'

Page:	Policy G7 Trees and woodlands
Section:	G7

- C - suggested amended wording to 'Development proposals should ensure that existing trees of quality are retained'.
- Concern over lack of clarity on 'trees of quality' - suggest reference to BS 5837:2015 within guidance notes.
- C - final sentence suggest re-wording to 'The planting of additional trees should generally be included in new developments – particularly large canopied-species (where appropriate) to exploit a wider range of benefits due to the larger surface area of their canopy.'

Page:	Policy SI1 Improving air quality
Section:	SI1

Support.

Page:	Policy SI2 Minimising greenhouse gas emissions
Section:	SI2

- Use an in-use 2030 zero carbon definition and add a forth step to the energy hierarchy (be seen). 'Operational Zero Carbon' by 2030 for all new buildings - this moves beyond the current definition of a 'design prediction' using a 'percentage CO2 reduction', to deliver actual operational and measured zero carbon buildings.

A. Major development should have zero carbon emissions in operation by 2030. This means reducing carbon   dioxide emissions from construction and operation, and minimising both annual and peak energy demand in accordance with the following energy hierarchy

1. Be lean…
2. Be clean….
3. Be green …

- Remove the words "will be expected to":

B. 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 monitor and report on energy performance

- Remove "in meeting the zero carbon target". This over represents the impact a 35% reduction beyond Building Regulations would have on achieving operational zero carbon. Remove "aim to" for the 10 and 15% reduction targets and introduce "a minimum of" to provide a clear level of performance.

C. A minimum on-site reduction of at least 35 per cent beyond Building Regulations is expected. Residential development should achieve a minimum of 10 per cent, and non-residential development should achieve a minimum of 15 per cent through energy efficiency measures. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided:

- Consider bringing life cycle carbon into policy though the addition of a clause (E) in policy SI 2. Wording to read:

E. Referable schemes should quantify whole life carbon through a nationally recognized Carbon Life Cycle Assessment (Carbon-LCA) & demonstrate actions taken to reduce lifecycle carbon informed by this analysis.

Page:	Policy SI2 Minimising greenhouse gas emissions
Section:	9.2.9

- Swap the word "demand" for "consumption". Move clarification on monitoring and reporting techniques to the SPG as these may change over time - remove "such as by displaying a Display Energy Certificate (DEC)":

  9.2.9 - "The move towards zero-carbon development requires comprehensive monitoring of energy consumption and carbon emissions to ensure that planning commitments are being delivered. Major developments are required to monitor and report on energy performance and reporting to the Mayor for at least five years via an online portal to enable the GLA to identify good practice and report on the operational performance of new development in London."

Page:	Policy SI2 Minimising greenhouse gas emissions
Section:	9.2.10

- 9.2.10 – In the list of content in energy strategies - change the following:

g. Reword text to encourage variety and innovation in applications and remove proscriptive technologies. The word 'response' should be replaced with the word 'management':

To anticipate infrastructure capacity challenges for a growing London, submit proposals for energy demand management and reductions in peak energy demand.

h. Swap the words "proposals for" to "demonstrate", swap the word "demand" for "consumption", and add the words "monthly and reported" for clarification of frequency:

Demonstrate how energy consumption and carbon emissions post-construction will be monitored monthly and reported annually (for at least five years).

i. Remove "by 2050" and change to "in operation by 2030":

Proposals explaining how the site has been future-proofed to achieve zero-carbon on-site emissions in operation by 2030.

k. Strengthen wording to take into account the whole life cycle of materials as well as the embodied carbon:

Proposals to demonstrate actions taken to minimise whole life cycle carbon

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Page: Policy SI3 Energy Infrastructure
Section: SI3

- Edit the heating hierarchy by:
  - Swapping clauses a. and b. and re-phrasing to include energy sharing and efficiency measures. Also only ask applicants to connect to local heat networks where they are working efficiently, the cost of heat to occupants is reasonable, and there is a zero emissions transition plan in place.
  - Merging clauses c. and d. do that zero emission sources are preferred.
  - Merging clauses e. and f. for the use of CHP and gas boilers. CHP should only be used where it is suitable for the size and demand of the development. CHP or gas boilers should only be used where there is a zero emissions transition plan in place.

- Therefore the policy should read as follows:

    D. Major development proposals within Heat Network Priority Areas should have a communal heating system.

1) the heat source for the communal heating system should be selected in accordance with the following low carbon heating hierarchy:

a. connect to an energy sharing network through the capturing and using of waste heat and/or use of available local secondary heat sources.

b. connect to a local existing or planned heat network where it is demonstrated to be running efficiently, the cost of heat to occupants is comparable to national average heating fuel costs, and there is a zero emissions transition plan in place to ensure that the development achieves zero carbon emissions in operation (if it is not already fossil fuel free).

c. generate clean heat and/or power from zero-emission sources (examples include: solar technologies, heat pumps and energy storage powered by renewables).

d. use low emission combined heat and power (CHP) (where suitable for size and demand of development) or ultra-low NOx gas boilers (in areas where legal air quality limits are exceeded all development proposals must provide evidence to show that any emissions related to energy generation will be equivalent or lower than those of an ultra-low NOx gas boiler). If the development uses fossil fuels then a zero emissions transition plan must be in place to ensure that the development achieves zero carbon emissions in operation by 2030.

Page:	Policy SI4 Managing heat risk
Section:	SI4

Strongly agree with this policy and guidance.

Page:	Chapter 10 Transport
Section:	N/A

Growth corridors and Strategic Infrastructure Priorities are the priorities in the draft London Plan's spatial strategy, with the 'Healthy Streets Approach' the cornerstone of the Mayor's transport policies for development plans and proposals, supported heavily by TFL.

The intention is to improve health and reduce health inequalities, while increasing levels of walking, cycling and public transport use towards the 80% target of all trips by 2041. The Healthy Streets Approach will be instrumental in improving environmental quality and reaching the 2050 zero carbon target that the Mayor has set. Linked to this is the intent to promote car free development in areas with high PTAL levels.

Page:	Policy T1 Strategic approach to transport
Section:	10.1.1

Paragraphs 10.1.1 to 10.1.5:

Fully support aspiration that 80% of all trips to made by foot / cycle / public transport by 2041. Rebalancing the transport system is laudable, as well as promoting high quality transport interchanges.

Page:	Policy T1 Strategic approach to transport
Section:	10.1.2

Paragraphs 10.1.1 to 10.1.5:

Fully support aspiration that 80% of all trips to made by foot / cycle / public transport by 2041. Rebalancing the transport system is laudable, as well as promoting high quality transport interchanges.

Page:	Policy T1 Strategic approach to transport
Section:	10.1.3

Paragraphs 10.1.1 to 10.1.5:

Fully support aspiration that 80% of all trips to made by foot / cycle / public transport by 2041. Rebalancing the transport system is laudable, as well as promoting high quality transport interchanges.

Page:	Policy T1 Strategic approach to transport
Section:	10.1.4

Paragraphs 10.1.1 to 10.1.5:

Fully support aspiration that 80% of all trips to made by foot / cycle / public transport by 2041. Rebalancing the transport system is laudable, as well as promoting high quality transport interchanges.

Page:	Policy T1 Strategic approach to transport
Section:	10.1.5

Paragraphs 10.1.1 to 10.1.5:

Fully support aspiration that 80% of all trips to made by foot / cycle / public transport by 2041. Rebalancing the transport system is laudable, as well as promoting high quality transport interchanges.

Page:	Policy T2 Healthy streets
Section:	N/A

Paragraphs 10.2.1 to 10.2.7:
Fully support aspiration for promotion of shorter trips, as well as the integration of freight initiatives through sensitively designed freight facilities. Freight to be better integrated into transport planning initiatives. The 10 Healthy streets targets shouldn't just be focussed on Opportunity areas and new development, but be promoted generally throughout London.

Page:	Policy T2 Healthy streets
Section:	10.2.8

Further clarity required on the aspiration for reducing danger on streets. Much stronger aspiration required if cycling is going to achieve the levels required by the London Plan. Vision Zero to have greater emphasis if sustainable travel targets are going to be achieved.

Page:	Policy T3 Transport capacity, connectivity and safeguarding
Section:	T3

B.3.: Need to include London Green Grid Network in list.

Page:	Policy T3 Transport capacity, connectivity and safeguarding
Section:	Table 10.1

ULEZ to target all forms of transport, London wide not just central London.

Page:	Policy T4 Assessing and mitigating transport impacts
Section:	T4

F. Development proposals should improve road danger, not maintain the status quo. Public realm proposals should seek to mitigate road accidents – the close collaboration between architects, urban designers, landscape architects and transport consultants therefore becomes increasingly important.

Page:	Policy T4 Assessing and mitigating transport impacts
Section:	10.4.3

To include at the end of paragraph: *such as Green Infrastructure (G.I.)*

Page:	Policy T5 Cycling
Section:	T5

A. Strengthen to include 'cycling for all demographics'.

Page:	Policy T5 Cycling
Section:	Table 10.2

Higher parking standards should apply London wide, not just within the favoured central London Boroughs. If car dominance is to be mitigated then a strategic overview needs to be taken London wide in terms of parking facilities for all. Only 5 percent potentially cyclable trips in Outer London were cycled, compared to 9 percent in Inner London and 14 percent in Central London. The promotion of cycling in outer London boroughs to be strengthened to promote point to point journeys, as opposed to the hub and spoke movement.

Page:	Policy T5 Cycling
Section:	10.5.1

To include at the end of paragraph: *'and demographics'*

Page:	Policy T5 Cycling
Section:	10.5.2

Paragraphs 10.5.2 - 10.5.3:

Higher cycle parking standards to apply London wide, in accordance with the aspirations of 10.5.4.

Page:	Policy T5 Cycling
Section:	10.5.3

Paragraphs 10.5.2 - 10.5.3:

Higher cycle parking standards to apply London wide, in accordance with the aspirations of 10.5.4.

Page:	Policy T6 Car parking
Section:	N/A

Fully support the intention to promote car free development in areas with high public transport accessibility.

Page:	Policy T6 Car parking
Section:	10.6.1

Higher cycle parking standards to apply London wide, in accordance with the aspirations of 10.5.4.

Page:	Policy T6 Car parking
Section:	10.6.3

PTAL levels are a crude determinant of development density. These should be urgently reviewed to include TfL's Cycle Hire Scheme and walkability to public transport facilities within PTAL calculations. This will allow for increased density of development.

Page:	Policy T6.1 Residential parking
Section:	N/A

Comment required on design of car parking areas, to ensure that the visual impact of parking areas are mitigated and considered in development.

Page:	Policy T6.1 Residential parking
Section:	Table 10.3

Parking levels shouldn't distinguish between outer London and inner London but be consistent based upon PTAL levels.

Parking strategies to be tenure blind and not have higher levels for private residential schemes.

Page:	Policy T7 Freight and servicing
Section:	T7

Regional Consolidation and distribution centres to be a key consideration in transport planning / servicing strategies.

Page:	Policy DF1 Delivery of the Plan and Planning Obligations
Section:	N/A

Funding (Chapter 11)

We are disappointed that so much is being said about the problems associated with funding, and so little about the solutions. While greater devolution may provide an answer, it is dangerous to rely on this and it risks pitching Mayors/regions into battle with each other when the reality is that all parts of the country require investment. While it is important to be ambitious, results are what count. Success will be judged on the quality of built outcomes, not on the wording of the plan policies, and this will rely on realistic levels of financial support.

Page:	Multi-policy response
Section:	N/A

Full comment

Page:	Annex Three Glossary
Section:	N/A

If habitable rooms are to be referred to, and particularly if they are used within a metric (e.g. a measure of density or a way to asses like-for-like replacement of affordable housing) the word 'habitable' should be defined in the glossary.