

Labour Group Response to the 2017 Draft London Plan

This response from the London Labour Group should be read in conjunction with the response of the London Assembly Planning Committee's, which was drafted under the Chair of Nicky Gavron AM and which the London Labour Group also supports.

The London Labour Group very much welcomes the Draft London Plan. This new Plan is a departure to that developed under the previous Mayoralty. It sets out bold ambitious and challenging policies for London under the overarching umbrella of Good Growth and reflecting the principle purposes of our Mayoralty as expressed in the GLA Act.

One of the stand out markers of this plan is its drive to make the best use of land: both using land more efficiently and more creatively while continuing the strong commitment accommodating London's population within its boundaries without building on the Green Belt or open space.

The presumption in favour of small sites is bold. It opens up new opportunities for new forms of housing. Policies encouraging co-location and mixed-use developments are to be welcomed.

We also welcome the design-led approach of this Plan, which is well overdue.

One of the major challenges of this Plan is the onus it places on Boroughs to deliver. We believe that Borough are best placed to assess the needs and capacity of their local areas but we also recognise the significant burden on them particularly given the current austerity measures imposed on them by the government. At the moment, boroughs lack both the skills and resources to deliver this new raft of plan making processes which stretches from tall building strategies to area design codes. Either there needs to be a whole unit to support councils or they need to be given the funds. Not all boroughs can be 'Croydons'.

We have made significant recommendations for changes and modifications in every area of this plan. However, overall we are very supportive of the direction that this Plan will take London into the future.

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

Policy GG6 Increasing efficiency and resilience

Suggested changes

Milestones on the way to being (net) zero-carbon by 2050 are needed.

Justification for policy recommendations

The Draft London Environment Strategy adds little in terms of periodical reduction / review of progress, with one milestone target for 2025. This provides one opportunity (in 7 years' time) to hold the then-Mayor to account, and then a 25-year gap in which there will be no easy way to determine whether the goal is achievable.

Policy GG6 Increasing efficiency and resilience

Suggested changes

Paragraphs 3.1.10-3.1.12 should be elevated from being in supporting text to being in the policies themselves - clearly set out in either Policy GG6, SI7 or SI8.

Justification for policy recommendations

It will strengthen the status of London circular economy principles

Chapter 2 Spatial Development Patterns

Policy SD1 Opportunity Areas

Suggested changes

archaeological strategies should be required for every opportunity area.

Justification for policy recommendations

Opportunity Areas should be underpinned with broad archaeological strategies covering such areas.

Chapter 3 Design:

Policy D2 Delivering good design

Suggested changes

local authorities should undertake conversations with the MPS and other services (e.g. NHS) when planning growth areas.

Justification for policy recommendations

This policy is welcomed as see crime statistics should be analysed when considering the growth potential of an area. Our change would help to ensure the police can advise specially on crime and plan future resources such as neighbourhood officers in advance.

As an example, as part of its' investigation into security at the Olympic Park, the Police and Crime Committee found that policing and security issues should be taken into account at the earliest stage of planning and regeneration. Given that such developments create extra demands on the police due to population increases, we feel that they should have an opportunity to work with local authorities to identify suitable growth areas.

Policy D6

Suggested Changes

We recommend that the density matrix be updated and revised to accommodate the new development pressures in order to guide boroughs and other stakeholders.

Justification for policy recommendations

The sustainable residential quality (density) matrix is over 20 years old and needs updating. Although it has evolved, there are such development pressures it requires revisions.

The original three settings – central, urban and suburban – are no longer appropriate and should be replaced with a framework which can be more appropriately applied for London's varied typology, character and topography. The plan already gives some guidance on density levels, which can be developed, and so does the Ove Arup paper commissioned by the GLA as to how the density matrix should be framed. This is in addition to the TfL density report.

We are concerned that it is not realistic for councils to be doing evaluations of growth capacity, density frameworks and character analyses for most parts of their borough and even if it was, it would not stop inconsistencies, uncertainty and development speculation based on land values.

Policy D8 Tall buildings

Suggested changes

We suggest an additional line at the start of Part A of the policy which refers to London wide Strategic context as a guidance/requirement for the boroughs and their local development plans to follow.

Justification for policy recommendations

Local consideration at Borough level proposed in the draft plan is not an issue but the plan requires a strategic vision for London's tall buildings in inner and outer London areas which is lacking in the document.

Policy D8 Tall buildings

Suggested changes

We suggest an additional line at the start of Part B of the policy which refers to a strategic London wide map and principles identifying overall requirements that boroughs should meet to comply with strategic tall buildings vision.

Justification for policy recommendations

The plan-led approach stated in this policy should apply to this section too.

Policy D8 Tall buildings

Suggested changes

Suggest a new section which sets out planning process covering the following:

- **Strategic:** Set up a 'Skyline / Tall Buildings Commission' to for strategic lead and scrutiny of tall buildings London wide.
- **Local:** Urban design panel supported by Skyline/Tall Buildings Commission to scrutinise tall buildings applications.
- **Rigorous master planning process:** Require developers proposing tall buildings to submit evidence of having considered other building configurations comprising low/medium rise schemes.
- **Community/Stakeholder Engagements:** Require local planning authority and developer/applicant to engage with local community/stakeholders and justify (high density and) tall building solution.

Justification for policy recommendations

The plan does not give any guidance or requirement for a clear (and different) planning process for tall buildings. This is a weakness in the draft Plan.

Policy D8 Tall buildings**Suggested changes**

The policy should be amended to protecting views of local tall landmarks

Justification for policy recommendations

There is no reference or importance given to protecting views of local tall landmarks which may not be listed or of any major architectural/heritage value but cherished by local residents and contributing to local character. Such landmarks and local views are of value and importance (often located in outer London areas).

Policy D11 Fire safety**Suggested changes**

Suggest including a requirement to install Carbon Monoxide alarms in all new developments and when retrofitting buildings.

Justification for policy recommendations

At present, despite CO being one of the most common causes of accidental poisoning in the UK, landlords in the private rented sector are only required to install CO alarms in properties that contain solid fuel burning appliances, such as open fireplaces and wood-burners

Chapter 4 Housing

Policy H2 Small Sites D.2 a) residential conversions

Suggested Changes

The presumption in favour of a) residential conversions must be closely monitored by both this Plan and the Boroughs and reviewed by 2021.

Justification for recommendations

At present, residential conversions represent just 4% of all new housing in London this figure is relatively low and does contain some 'de-converted' properties (from flats back to family homes).

However, we are concerned that this policy may bring about a massive uplift in the conversion of family homes (3 bed+) across London, rather than the moderate increase that is expected.

We are particularly concerned about the potential for loss of family homes in London particularly when we take this 'presumption in favour' in D.2 alongside the finding of the SHMA presented in Table 4.3 (please see further narrative on this below).

We do understand that conversion can be good particularly when it offers local people the opportunity to downsize in their local community.

Therefore, while we are not against conversion in principle we would not want to see the rate of conversion more than double. To guard against this we would like to see: a call on the Boroughs to monitor the rate of conversions in their area, a commitment to ongoing monitoring from the GLA, a review of the impact by 2021 and as a result of the review, if necessary, an update to remove this presumption in favour regarding residential conversion.

Policy H2 Small Sites D.1

Suggested Changes

The term underused should be defined here so as to bring clarity to the policy.

Justification for recommendations

There is a risk to non-designated industrial land in particular by the vague use of the term 'underused'. We would like the term to be strongly defined.

Policy H2 Small Sites D.1

Suggested Changes

Non-designated Industrial Land should be specifically exempted from the small sites policy.

Justification for recommendations

AS we have set out in our response to policy E4 C. We believe that there should be no net loss of non-designated industrial floorspace in the capital.

We believe that inclusion of the vague term underused in Policy H2.1 and “the demolition and redevelopment of existing buildings” in policy H.2.D.2c) risks the loss of non-designated industrial land even given the assurances in Policy E7D etc.

We do not believe that the conversion to residential of small maker spaces garages etc that occupy small non-designated industrial space is the intension of this Plan and therefore we should strongly guard against it by explicitly excluding Non-designated industrial space from the small sites policy.

Policy H3 Monitoring housing targets A

Suggested Changes

The London Plan should require the monitoring of the number of bedrooms and bed-spaces alongside units to provide a more robust measure of whether London’s housing need is being met. This should be recorded for all tenures.

Justification for Recommendations

Under the current proposed monitoring scheme a 1 bed flat with sleeping space for 1 person counts equally to a 3 bed house with sleeping space for 6 people.

This kind of monitoring and reporting does not give a true picture of the nature of housing provision in London.

Monitoring the number of bedrooms and bed spaces provided in a borough alongside the unit targets will reflect favourably on those schemes that provide a mix of family size units alongside 1 bed flats.

Policy H5 – Delivering Affordable Housing

Suggested Changes

That the term ‘affordable’ is specifically defined here (and throughout the Plan) to mean the Mayor’s definition of affordable.

Justification for Recommendations

Given the number of definitions of ‘affordable’ housing that London has seen over the years we feel that this Plan needs to be much more specific in each instance of the use of the term ‘affordable’ which type of ‘affordable’ is specifically meant.

We have understood in evidence from the Deputy Mayor for Housing that what is meant throughout the document is “the Mayor’s definition of affordable” as set out in 4.7.3.

However, the Glossary defines affordable as the Government’s definition thus, we believe, leaving sections of the Plan open to interpretation.

We believe the Mayor will agree that risk of misinterpretation, no matter how minimal, is too high to be anything other than entirely specific throughout the Plan as to which version of affordable each instance the term refers to.

Policy H7 Affordable housing tenure

Suggested Changes

The Borough target for low cost housing should be at least 60%. We reiterate that, at the very least, this 30% for low cost housing should be treated as a floor rather than a ceiling.

Justification for Recommendations

We welcome the note in policy H7 of the draft London Plan that this tenure split will be reviewed and if necessary updated in 2021.

Our position on tenure split, as set out in our response to the Housing and Viability SPG consultation, has not changed. We believe that we could be doing far more to build the social and low-cost rent housing that Londoners so desperately need.

The tenure split outlined in the Policy H7 does not line up with the tenure needed split given in Table 4.3.

In Table 4.3 the SHMA results show that 42,844 affordable (intermediate +low-cost) homes are required in London. Of those 30,972 or 72 per cent should be low-cost. 72 per cent is over double the need that is accounted for by this tenure split (30per cent). Even if the Borough's used their full 40 per cent to be determined on low cost housing (meaning they built no market housing) it would still not meet the need given in table 4.3.

By contrast intermediate housing need is shown in Table 4.3 as 27 per cent of all affordable housing this is wholly and indeed over-accounted for (by 3%) in the Policy 4.7's tenure split.

While we acknowledge the reasoning in 4.7.1 we believe that Policy H7 should be amended to more faithfully take into account London's need for low-cost housing.

We believe the Borough target for low cost housing should be at least 60%. We reiterate that, at the very least, this 30% for low cost housing should be treated as a floor rather than a ceiling.

We welcome the narrative in 4.7.2 that There is a presumption that the 40 per cent to be decided by Boroughs will focus on social rent/London Affordable rent in the draft London Plan. However, we would want to see this presumption given as Policy within H7.

TABLE 4.3- 2017 SHMA findings

Suggested changes

The findings of the SHMA as outlined in Table 4.3 to be reassessed to take into account: uncertainty regarding demographic data; the Impact of Brexit; the need for better data regarding over-crowding; and data on concealed families.

Justification for recommendations

The Labour Group is concerned that while the SHMA is as robust an evidence-base as is possible to arrive at, it is not without its flaws and that its findings should not be taken as definitive or overly relied on as the basis for planning decisions.

We are particularly concerned about the findings outlined in Table 4.3 – 2017 SHMA findings.

From the 2013 SHMA to the 2017 SHMA the percentage of units of each size has moved as follows.

Size	2013 SHMA		2017 SHMA		% Difference
1 bedroom	16,381	34%	36,335	55%	+21%
2 bedrooms	9,034	18%	10,788	16%	-2%
3 bedrooms	12,825	26%	8,971	14%	-12%
4+ bedrooms	10,602	22%	9,783	15%	-7%
Total	48,841	100%	65,878	100%	

This sharp increase in the number of 1 bed flats required for London taken alongside decreases in need in every other size of unit is startling to us.

We have concerns regarding the Demographic Projections and the Assessment of Backlog need (particularly with regard to calculations for over-crowding and concealed homes) which have all contributed to overall unit requirement calculation for London in the SHMA

DEMOGRAPHIC CHANGES

One of the reasons for number of 1 bed units required by this SHMA is the projected demographic changes in London which see a lower projection for households that include children in London than was previously projected in 2013.¹ The 2017 SHMA states that *“The proportion of the projected additional households that include children is significantly lower in these projections than in the GLA’s 2013 round of projections (around 17% to 30%).”*

While we understand that population projection is a complex science the fact that this projection would almost halve over two surveys a mere 4 years apart is of significant concern to us.

If this data is re-run in 2020 will it find that the number of households with children has actually doubled again?

¹ SHMA 2017, Paragraph 3.78, page 45

Clearly this projection impacts on the outcome of requirement for family homes, this has massive implications for London's growth and it needs to be right.

Even more significantly, and as the 2017 SHMA rightly states, the 2016 referendum result will have serious implications for the UK economy and it likely to have a serious impact on migration flows to and from London. We do not yet know what form this will take, other than to assume that the impact will be a 'shock' to our City. With this in mind, we believe it is imperative that as data emerges over the coming months and years it is included into the basis for calculating housing need in London would alter the London Plan in future.

BACKLOG NEED ASSESSMENT

The SHMA assessment of Backlog need is based on both evidence bases and definitions that London Labour Group believes are not satisfactory.

English Housing Survey

The reliance on evidence from the English Housing Survey is problematic in the SHMA's calculations. The EHS is a national survey, interviewing a sample of around 13,000 households a year weighting the results to be representative at the national level. And we understand that the SHMA uses three years of data to compensate for the fact that less than 2,000 households in London are surveyed in any given year. We find the heavy reliance on this survey particularly in looking at backlog need problematic. While we see there is some limited regional analysis publicly available from this survey in areas such as overcrowding there is none. It is unclear from the SHMA exactly how this analysis has been obtained.

Over-crowding

The SHMA rightly includes the assessment of overcrowded households in London. The SHMA bases its calculation of overcrowded homes on evidence from the English Housing Survey which uses the "bedroom standard" as its measure. The London Labour Group believes that the 'bedroom standard', while better than other national standards, for overcrowding is not wholly adequate for measuring actual overcrowding in modern London.

The bedroom standard says that:

"A separate bedroom is allowed for each married or cohabiting couple, any other person aged 21 or over, each pair of adolescents aged 10-20 of the same sex, and each pair of children under 10. Any unpaired person aged 10-20 is notionally paired, if possible, with a child under 10 of the same sex, or, if that is not possible, he or she is counted as requiring a separate bedroom, as is any unpaired child under 10."

However, this measure takes no account of the size or adequacy of a bedroom.

Imagine London family in a two bed flat with two male adolescents aged 16 and 17 sharing a 'box room' sized second bedroom. Imagine also that one of the teenagers has moved to sleeping in the living room because of his cramped bedroom conditions and need for privacy. According to the bedroom standard and therefore the SHMA, this family are not overcrowded as technically both teenagers have an adequate bedroom no matter how small that room is. This is clearly illogical and not how we want people to live in London. London Labour Group says that this family are overcrowded and should be in at least a 3 bed home and the SHMA should recognise that too.

We are deeply concerned therefore that the SHMA may be masking a much greater problem of overcrowding than it currently reports and is therefore underestimating the need for family sized homes in London.

The London Labour Group believes that London should have its own definition of overcrowding that is fit for purpose, much in the same way that London has its own definition of affordable housing or a living wage. We would recommend that overcrowding should be measured by bed-space rather than by the bedroom standard and that the calculation in the SHMA should be re-evaluated with this in mind.

The bed-space standard would take the bedroom standard and add to it the space standards outlined in the Policy D4 D – Private internal space of the Draft London Plan, which states that the minimum area of a double or twin bedroom should be 11.5 sq m.

Concealed Homes

We understand that the SHMA has taken the English Housing Survey data as its measure for concealed homes in London as the EHS not only reports of numbers of concealed households but also their need. However, Table 11 of the SHMA shows a worrying conclusion that leads us to believe that there is a flaw in the data. Under ‘concealed households’ the need for 1 and 2 bed flats in all tenures is given as 153,588 (and just under 10% of these are two bed) whereas the need for 3+ is exactly zero.

Given that the census data tells us that there were 68,600 concealed families with children in London 2011 we find it hard to understand how the figure of zero was arrived at.²

Policy H11 Ensuring the best use of stock

Suggested Changes

To include the wording after A (1) Boroughs should promote efficient use of existing stock by using all the tools available to reduce under-occupation of homes and encourage down-sizing in all tenures.

Justification for recommendations

This plan should encourage the best use of the stock London has. We know that a great many family sized homes are under-occupied, not only in the market but also in affordable tenures.

We would want the Plan to both encourage and help Boroughs to assess their stock in this way to help tackle over-crowding.

Policy H12 Housing Size mix

Suggested Changes

A1 should give equal weight to the SHMA and local assessment of needs

D1 should give priority to, evidence of local housing needs which should include evidence of over-crowding and under-occupying households, and the strategic requirement for affordable family accommodation.

Justification for recommendations

Boroughs know their local needs best. While the SHMA provides an evidence base – it is not without its flaws (see narrative on Table 4.3)– therefore, local needs should equally be taken into account in all tenures.

Specifically, on low-cost homes local need should take priority and family housing should be positively encouraged.

There should be a strategic requirement, in the Mayor’s final Housing Strategy, for affordable family accommodation and the Plan should direct readers to this. Particularly given that as the Plan states in paragraph 4.12.5 “one person and one- bed units are the least flexible unit type”.

Policy H12- C Housing Size mix

Suggested Changes

We do not agree with policy H 12 C. Boroughs should be very involved and alive to the mix of homes being built for market and most particularly intermediate sale. Particularly as this Plan lays out clearly the need for different size units in London and asks the Boroughs to ‘have regard’ to the SHMA and local needs in policy H12 A

Justification for Recommendations

The narrative explaining this policy is given in 4.12.2 and states that policies which prescribe mix are often inflexible and not implemented effectively. This Plan should be offering support to Boroughs to make these plans work rather than to make policy explicitly against them.

The reasoning that larger units do not meet identified need does not stand for the intermediate sector. It is just not the case that larger intermediate homes end up being occupied by sharers as this would be against the terms of the lease.

At the very least we would want to see the phrasing ‘and intermediate’ removed from policy H 12 C.

However, it would be more satisfactory to have H 12 C removed entirely.

Policy H13 Build to Rent

Suggested Changes

To include service charge certainty for the period of the tenancy.

Justification for Recommendations

Given the reported issues with service charges in Shared Ownership schemes which have led the Mayor to propose a 'London Shared Ownership' (Mayor's draft housing strategy pg. 105), Policy H13 7 should state that the scheme should also include service charge certainty for the period of the tenancy.

Policy H14 Supported and specialised accommodation

Suggested Changes

Two additional categories to be included in the policy:

- People being treated for communicable diseases, notably tuberculosis
- People recently released from prison

Justification for Recommendations

One in ten TB patients in London is homeless or vulnerably housed. The outcomes for homeless TB patients who are ineligible for local authority housing are poor. They often drop out of treatment, risking the reactivation of the disease and the development of drug resistance. They are also more likely to infect others – an average of between six and twelve additional cases – which leads to exponential rises in treatment costs.

The Mayor has committed to action on tuberculosis in the Health Inequalities Strategy. Homerton Hospital TB team has worked in partnership with the London Borough of Hackney housing department to house homeless people with no recourse to public funds in local temporary accommodation. They have done so by establishing a service level agreement (SLA) which is paid for by City of London and Hackney local authorities. The success of the Homerton TB SLA reinforces the argument that investing in accommodation resources for homeless TB patients across London would be both humane and cost effective. We would like to see more London boroughs explore this model.

Having stable accommodation is vital to both good mental health and to preventing reoffending. But many people leave prison without it. Local authorities have a statutory duty to assist homeless and vulnerable ex-offenders in some circumstances. However, each London local authority has a different set of thresholds for providing housing support. Supported housing remains one of the key housing options for ex-offenders to ensure continuity of care between prison and community mental health services.

Policy H14 Supported and specialised accommodation

Suggested Changes

Narrative section 4.14.1 says that “Boroughs should undertake assessments of the short and long-term needs for supported and specialised accommodation within their borough” we believe that this should be in the policy box.

Justification for Recommendations

Many Boroughs will do this as a matter of course, however, in order to achieve consistency across London – particularly as many of the groups listed are those who may need cross-Borough support, boroughs should be required to assess need.

Policy H14 7) Supported and specialised accommodation

Suggested Changes

Wording in paragraph 4.14.1 to include encouraging Boroughs to work together when they are assessing the need for accommodation for victims of domestic violence as well as planning together to meet these challenges.

Justification for Recommendations

Paragraph 4.14.1 acknowledges that certain types of specialist housing provision may be best met through a pan-London or multi-borough arrangement. This is especially the case with domestic abuse as refuges may be better placed outside of the borough so women do not live near their abuser.

As such, we welcome that the plan acknowledges need is best met between boroughs. However, we would like to go one stage further and suggest that boroughs should be encouraged to work together when they are assessing the need for accommodation for victims of domestic violence as well as planning together to meet these challenges.

Policy H15 Specialist older persons housing

Suggested Changes

Inclusion of “Boroughs should undertake assessments of the short and long-term needs for supported and specialised accommodation within their borough” in the policy box.

Justification for Recommendations

Many Boroughs will do this as a matter of course, however, in order to achieve consistency across London – particularly as many of the groups listed are those who may need cross-Borough support, boroughs should be required to assess need.

Policy H16 -G Gypsy and Traveller Pitches

Suggested Changes

G. Boroughs must set their own targets for pitches and sites based on their needs assessments.

These targets, set by the Boroughs, will form the basis of a KPI in this Plan which the GLA will monitor.

Justification for Recommendations

The London Plan provides targets for units in all other tenures, in accordance with the GLA's duty to equalities, the London Plan should also seek to gather targets for pitches and sites based on needs assessments.

Insufficient pitch provision can lead to a rise in unauthorised encampments, with implications for the health and wellbeing of Gypsies and Travellers, community cohesion and costs for boroughs.

A particular challenge is the fact that many local authorities take a blanket approach, not being able to separate between different types of encampments such as families with strong connections to an area and families passing through the borough.

In seeking to address this Boroughs must work to set their own targets for pitches and sites based on their needs assessments.

Policy M1 Monitoring

Suggested Changes

That the monitoring of Bed-Spaces by tenure be included in Table 12.1 and be reported in the Annual Monitoring Report

The monitoring of residential conversions should be included in Table 12.1 and be reported in the Annual Monitoring report.

The monitoring of demolitions should be included in Table 12.1 and be reported in the Annual Monitoring report.

Justification

As set out in under policy H3 under the current proposed KPI monitoring scheme for both the supply of new homes and the supply of affordable homes, a 1 bed flat with sleeping space for 1 person counts equally to a 3 bed house with sleeping space for 6 people.

Bed space, which takes the bedroom standard and is a valuable measure because it tells us not only how much space is created for people to live in London adding to the story of the number of units.

Units should be reported as for example 2b3p (2 bed 3 people), which means a 2 bed property with sleeping space for 3 people etc.

The bed-space standard would take the bedroom standard and add to it the space standards outlined in the Policy D4 D – Private internal space of the Draft London Plan, which states that the minimum area of a double or twin bedroom should be 11.5 sq m.

Under policy H2 we outline why the Annual Monitoring Reports should keep an stringent eye on residential conversion.

Chapter 5 Social Infrastructure:

Policy S1 Developing London's social infrastructure

Suggested changes

"including affordable grocery shops and markets" should be added to the end of S1A. So it now reads, "Boroughs, in their Development Plans, should undertake a needs assessment of social infrastructure to meet the needs of London's diverse communities, including affordable grocery shops and markets."

Justification for policy recommendations

To prevent food insecurity and ensure that new developments have access to affordable food instead of just franchised smaller shops which can be more expensive.

Policy S1 Developing London's social infrastructure

Suggested changes

The Policy needs to explore possibility of having a policy for Hindu Cremation facilities along the principles of Policies S7 – B and C.

Justification for policy recommendations

Policy S1 in para 5.1.1 mentions and range of services and facilities to meet local and strategic needs. It refers to 'faith' as one of the facilities and Policy S7 deals with Burial space requirements to meet faith specific requirements.

I note that there is no mention of cremation facilities. There is a big debate and aspiration for a culturally specific Hindu Crematorium facility in North-West London.

Policy S2 Health and social care facilities

Suggested changes

Add the words "workforce planning" to para S2A, which now read "Boroughs should work with Clinical Commissioning Groups (CCGs) and other NHS and community organisations to: 1) identify and address local health and social care needs within Development Plans taking account of NHS Forward Planning documents and related commissioning and estate strategies, workforce planning, Joint Strategic Needs Assessments and Health and Wellbeing Strategies."

Justification for policy recommendations

The NHS relies on its workforce to function. Especially considering Brexit there are serious concerns about having enough healthcare workers to sustain the work the NHS does, particularly in London. Addressing local health and social care needs will need to take into account workforce planning.

Policy S11 Improving air quality

Suggested changes

The policy should seek to maximise positive impacts as well as reduce the negative impacts.

Justification for policy recommendations

In line with response to policy GG3, would like to see stronger measures to maximise the positive impact of development on reducing air pollution, particularly in deprived neighbourhoods and in locations with high concentrations of vulnerable people such as care homes, schools and hospitals.

Chapter 6 Economy

Policy E1 Offices

Suggested changes

“to support firms wishing to start-up or expand” should be added to E1A which now reads “Improvements to the competitiveness and quality of office space of different sizes (for micro, small, medium-sized and larger enterprises) to support firms wishing to start-up or expand should be supported by new office provision, refurbishment and mixed-use development.”

Justification for policy recommendations

There are issues with ensuring enough business space dedicated to those businesses that wish to expand or grow. It should be recognised that start-ups and those wishing to expand have different requirements.

Policy E1 Offices

Suggested changes

The policy should define what ‘clusters of world city businesses’ are.

Justification for policy recommendations

The policy needs to recognise the fact that *that offices are dispersed across London’s high streets, industrial estates, and in residential areas, rather than falling neatly within defined town centre office locations or business parks.* The Article 4 guidance focusses on “office cluster” rather than seeking to protect all offices across London.

Policy E4 Land for industry, logistics and services to support London's economic function

Part D and Table 6.2 should be reconsidered to outline additional industrial floorspace per borough.

The Plan enable Boroughs to produce an audit of their industrial land an accommodation capacity

Justification for policy recommendations

As outlined in the Industrial Land “The stock of industrial land in London is shrinking rapidly.” From 2011 to now London has struggled to control this loss.

Rather than be prepared to lose 233 ha of industrial land over the plan period we should be setting local authorities positive annual targets for industrial land provision.

We should therefore not be dividing London Boroughs into 'retain', 'provide' and 'limited release', instead the Policy should instead strive for additional capacity wherever we can get it.

Part D should focus on where such 'provision' should be particularly encouraged. Boroughs in the 'limited release' category have been identified as such because they have 'industrial land vacancy rates above the London average' (para 6.4.8). The Plan does not provide evidence as to whether the vacancy rate is due to too much land, or whether it is due to a lack of transport infrastructure, facilities, usefulness of current buildings. These questions need to be answered before the land is lost forever.

Stronger explanation, guidance and requirements for both local authorities and developers are required to ensure nil net loss. Nil net loss across London is too broad and needs to be borough specific. A clear decant strategy needs to be provided before industrial land is redeveloped. Boroughs need to produce an audit of their industrial land and accommodation capacity so we can measure the policy against them. The policy needs to ensure that terms such as intensification, substitution, consolidation, rationalisation, etc are adequately defined.

Policy E4 Land for industry, logistics and services to support London's economic function

Suggested changes

Policy E4 C should be amended to include the 'no net loss of industrial floorspace capacity' covers non-designated industrial sites as well as SIL and LSIS.

Justification for policy recommendations

Policy E4 B recognises the three categories of industrial land, but Policy E4 C provides for a 'no net loss' protection for only two of them. Non-designated industrial land is not subject to this protection – yet forms 36 per cent of industrial land in London. The GLA evidence base shows that over the last period, 2010-15, SIL has declined by 7% and LSIS by 25.3%.

The SIL designation had previously proved successful in retaining industrial land, but in the last five years this (along with Locally Significant Industrial Sites) has now become the principal source of land release. The evidence shows that a substantial amount of land has already been identified for release and there are waiting lists for industrial premises. While agreeing strongly with the policy E4 A9 we believe that boroughs should be encouraged to provide more capacity across all designations.

Non-Designated land should be included in the no net loss policy. Non-designated industrial land/accommodation is to be found in and around high streets all over London. It comprises a wide range of business activity from makers of all kinds to repairs and mechanics. These activities are crucial to London's local economies and jobs and contribute to the mixed-use nature of high streets and town centres. Given Permitted Development Rights, the demand pressure for residential development and speculative demand, non-designated sites are very vulnerable. Their lack of inclusion seems an anomaly and should be amended in Policy E4 C.

Policy E4 Land for industry, logistics and services to support London's economic function

Suggested changes

The Plan needs to be clear on what constitutes floorspace, given the policy and text seems to be at odds with one another.

Justification for policy recommendations

The DLP recognised yard space and floorspace, but it is not clear whether the yard space is counted as floorspace and whether it is subject to the 65 per cent.

Policy E4 Land for industry, logistics and services to support London's economic function

Suggested changes

Under 6.4.5 “The principle of no net loss of floorspace capacity does not apply to sites previously used for utilities infrastructure or land for transport functions which are no longer required”. We believe this principle should apply to sites previously used for utilities infrastructure or land for transport functions

Justification for policy recommendations

The London Industrial Land Report, June 2017 acknowledges that currently London has a small surplus of waste capacity land however this is heavily caveated as follows “Firstly, revised waste projections and revised borough apportionments are currently under development by the GLA. It is possible that the principle of self-sufficiency for London, and apportionment between boroughs, may be applied to CDE and hazardous waste in addition to household and C&I waste. This may have implications for the amount of land required to manage waste within London.

Secondly, the proposed move towards a circular economy would reduce the need for residual waste treatment facilities, but is likely to generate increased demand for recycling and remanufacturing facilities. So, the overall effect of transition to a circular economy will depend on the extent to which the circular economy reduces the volume of resources entering the waste stream in the first place.”

We have also been told by Thames Water that there is insufficient safeguarding land for waste water and sewage treatment works in the light of London’s growing population.

Evidence regarding land for transport says: The major transport investment programme required to support London’s growth to 2050 will generate demand for additional industrial

land. This demand will primarily include land for new rail and bus depots, and for new stations. The demand is likely to be focused in Opportunity Areas and also in locations that support major transport projects such as HS2 and Crossrail 2, although there may be increased demand outside these areas (e.g. for bus depots). The overall scale of demand to 2050 is currently difficult to assess, but could be around 200 ha or more (excluding land that may be needed for mixed-use development to support the business case for new transport infrastructure schemes). This increased demand is likely to be balanced to some degree by release of transport land in other locations from facilities that are no longer used, by National Rail or TfL.”

In both these instances the evidence suggests that Land that was previously used for utilities or transport function may still be required. Until we properly understand London’s future growth need in these areas this land should be safeguarded.

Policy E5 Strategic Industrial Locations (SIL)

Suggested changes

“nurseries” should be added to E5C6 which now reads “small-scale ‘walk to’ services for industrial occupiers such as workplace crèches, nurseries or cafés.”

Justification for policy recommendations

Workplace creches can be expensive and there is a shortage of affordable nurseries in London.

Suggested changes

*The Policy needs to be much stronger in seeking to retain SIL wherever possible.
The Policy has been tightened to exclude non-industrial uses (including retail, places of worship, leisure and assembly uses), with no assessment on the impact on these other uses.*

Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function

Suggested changes

The aspiration is undermined by the large-scale potential loss of non-designated industrial sites

The driver for the policy appears to be the release of some land for residential use, rather than increasing the capacity of industrial accommodation and maintaining the function of existing industrial uses

The policy needs to differentiate between intensification (through mixed use including residential) and intensification of industrial uses (via multi-storey etc).

There is no evidence of the viability and deliverability of the intensification policy.

There is a lack of clarity around floor space/yard space in both Policy E4 and E7

the policy of substitution should be a separate policy, with a clearly defined strategy requiring collaborative working.

Justification for policy recommendations

TBC Nicky Gavron AM

Policy E9 Retail, markets and hot food takeaways

Suggested changes

“including affordable food markets in town centres” should be added to E9B5 which now reads “provide a policy framework to enhance local and neighbourhood shopping facilities and prevent the loss of retail and related facilities that provide essential convenience and specialist shopping including affordable food markets in town centres”

Justification for policy recommendations

To prevent food insecurity and ensure that new developments and communities have access to affordable, fresh food locally resourced and supporting local economies.

Policy E9 Retail, markets and hot food takeaways

Suggested changes

E9B9 Suggested adding bullet point f) should not permit premises with a gambling license, high interest short term loans or pawnbrokers within 400 metres of each other.

Justification for policy recommendations

To prevent clustering of these premises which cause financial insecurity, debt and poverty.

Policy E9 Retail, markets and hot food takeaways

Suggested changes

Suggest including requirement for food outlets within healthcare facilities to abide by the Healthier Catering Commitment standard

Justification for policy recommendations

Food available within healthcare facilities often contradicts the purpose of the facility; not being itself healthy. The Mayor should work towards a shift in culture, to encourage a culture of self-care and wellbeing in relation to dietary choices, and this would be a step towards this

Policy E11 Skills and opportunities for all

Suggested changes

“and the gender pay gap” added to E11A which now reads “The Mayor will work with strategic partners to address low pay and the gender pay gap and, supported by his Skills for Londoners Taskforce, co-ordinate national, regional and local initiatives to promote inclusive access to training, skills and employment opportunities for all Londoners”

Justification for policy recommendations

The gender pay gap, workplace sexism and the glass ceiling mean that women, and doubly for women from a black and ethnic minority background, are more likely to be in low-paid jobs and poverty. Both low-pay and poverty lead to bad health outcomes and constitute a health inequality. Despite the Equal Pay Act in 1970, women still earn less than men in Britain today and the gender pay gap in London is currently 22% (16.8% median), an increase on last year’s 21.8% (16.1% median). Nationally, the figure is 17.4%. The full-time pay gap in London is 20.7% and part-time is 1.3%.

Chapter 7 Heritage and Culture

Policy HC5 Supporting London's culture and creative industries;

Suggested changes

We would like a clearer definition of Policy A2 identify and promote new, or enhance existing, locally-distinct clusters of cultural facilities, venues and related uses defined as Cultural Quarters, especially where they can provide an anchor for local regeneration and town centre renewal

Justification for policy recommendations

To ensure clarity.

Policy HC5 Supporting London's culture and creative industries;

Suggested changes

“educational” should be added to Policy C5 so it now reads “integrate public transport, digital and other infrastructure and service provision such as leisure, recreation, educational and community facilities in the establishment and development of the Creative Enterprise Zone”

Justification for policy recommendations

To encourage access to cultural resources to young people and to encourage continued growth of skills and the cultural sector.

Policy HC7 Protecting public houses

Suggested changes

“who may use this as a focus point” should be added to HC7A1 so it now reads “protect public houses where they have a heritage, economic, social or cultural value to local communities who may use this as a focus point, and where they contribute to wider policy objectives for town centres, night-time economy areas and Creative Enterprise Zones”

Justification for policy recommendations

To avoid losing those pubs which have a strong link with the community, for example, the LGBT community who often feel safer having their own space.

Policy HC7 Protecting public houses

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Justification for policy recommendations

To avoid losing those pubs which have a strong link with the community, for example, the LGBT community who often feel safer having their own space.

Policy HC7 Protecting public houses

Suggested changes

“or reopening” and “for similar recreational community uses” should be added to HC7A2 so it now reads “support proposals for new or reopening public houses to stimulate town centre regeneration, cultural quarters, the night-time economy and mixed-use development for similar recreational community uses, where appropriate.”

Justification for policy recommendations

So that pubs can be reopened instead of new ones created.

Chapter 8 Green Infrastructure and Natural Environment

Policy G8 Food growing

Suggested changes

Policy G8 on Food growing makes no mention of the new developments in commercial farming in cities such as hydroponic farming. Such new developments should be added.

Justification for policy recommendations

London should be leading the debate on new forms of farming for urban populations and the implications they have for climate change, food security and ethics.

Policy G8 Food growing

Suggested changes

“increased” should be added to A1 so it now reads “protect existing allotments and encourage increased provision of space for community gardening, including for food growing, within new developments”

Justification for policy recommendations

To provide more opportunity for Londoners to grow their own food.

Policy G9 Geodiversity

Suggested changes

Policy G9’s requirement of boroughs to establish clear goals for the management of geodiversity sites to promote public access, appreciation and interpretation of geodiversity should also include the goal “to make a positive contribution to the protection and enhancement of geodiversity”.

Justification for policy recommendations

We believe in the importance of biodiversity and want the plan to protect and enhance it.

Chapter 9 Sustainable Infrastructure

Policy SI2 Minimising greenhouse gas emissions

Suggested changes

More frequent monitoring is required.

Justification for policy recommendations

In light of the inconsistent handling of applications that include off-set proposals across London boroughs Policy SI2's requirement for boroughs to set up and administer an off - set Fund is welcomed. However, to ensure a consistent high standard of handling and allocation of funds proactive more frequent monitoring by the GLA rather than annual self-reporting by the boroughs until all the boroughs off-set Fund processes are established.

Policy SI3 Energy Infrastructure

Suggested changes

The Plan is at odds with the Environmental Strategy and needs to be amended.

Justification for policy recommendations

Despite the Environmental Strategy saying, "London will have sufficient incineration capacity to manage London's non-recyclable municipal waste once the new Edmonton and Beddington Lane facilities are operational." (page 265) the Draft London Plan does not rule out future incinerators. Policy SI3 includes "Energy from waste possibilities" in the list of opportunities boroughs' Energy Masterplans should identify. The supporting paragraph 9.3.7 states: "Increasing the amount of new renewable energy sources in London developments is supported. This includes the use of energy from waste schemes that are connected to a heat network ..."

Policy SI8 Waste capacity and net waste self sufficiency

Suggested changes

The principles of the circular economy need to be outlined.

Justification for policy recommendations

The introduction of the requirement for referable applications to submit a Circular Economy Statement is welcomed but the opportunity to reinforce policies on London's circular economy should not be lost.

Policy SI7A lists actions that can help to achieve waste reduction and increase reuse and

recycling.

SI8B requires development plans “to identify how waste will be reduced, in line with the principles of the Circular Economy and how remaining quantum of waste will be managed” without spelling out what those principles are.

Policy SI14 Waterways - strategic role

Suggested changes

We would like to see plans for safety equipment such as personal flotation devices around riverside developments.

Justification for policy recommendations

We support the work of Royal National Lifeboat Institution in this area and believe their representation to the London plan has useful advice which would improve the safety of developments around waterways.

Policy SI17 Protecting London's waterways

Suggested changes

A new section A in SI15 to read “*Development proposal should protect and enhance the open nature, habitats and heritage of London's waterways (policy SI17) as well as enhancing their use for transport.*”

Justification for policy recommendations

The separation of waterways as transport, and waterways as sites of biodiversity and historical merit in the text may have the effect of dividing these purposes when considered by developers or planning committees.

A new section A in SI15 that makes it refer explicitly to SI17 seems to be the easiest way to clarify that they are both applicable to all development covered in SI15. Something along the lines of:

A Development proposal should protect and enhance the open nature, habitats and heritage of London's waterways (policy SI17) as well as enhancing their use for transport.

It has also been noted that in May 2017, the London Waterways Commission was merged with the River Concordat to form a single transport and environment group, the Thames and London Waterways Forum: <https://www.london.gov.uk/decisions/md2116-thames-and-london-waterways-forum>

The Forum is led by a steering group, chaired by the Deputy Mayor of London for Transport, and the focus does seem much more on transport and other uses (recreation etc.) rather than

environmental. This is an unwelcome step and the Forum should place greater emphasis on London's waterways as environmental assets and habitats.

Chapter 10 Transport

Policy T5 Cycling

Suggested changes

The policy would also be stronger if it highlights priority need for cycling initiatives in Outer London Boroughs with 'Opportunity Areas' and 'Intensification designations.

Justification for policy recommendations

Policy justification para 10.5.1 states 'The Mayor will deliver, in partnership with boroughs, a new London-wide network of strategic cycling routes'. But in the policy, itself there is no reference to Mayor's strategic role in inspiring and promoting cycling across London.

Policy T6 Car parking

Suggested changes

Suggest adding a policy on Hospital parking. This should be free for all patients and visitors.

Justification for policy recommendations

The Hospital Car Parking Charges (Abolition) Bill 2017-19 will have its 2nd reading at the House of Commons on 16 March 2018. Extracts from first reading: *The sick and vulnerable are disproportionately hit, particularly those with long-term and severe illnesses that require repeated and lengthy stays in hospital. Research has shown that cancer patients and parents of premature babies face the greatest financial consequences. [...] Much of the hospital workforce cannot rely on public transport to get to work, particularly if they are working shifts at unsociable hours. Many have no choice but to use hospital car parks. While all hospitals seem to offer a discounted parking-scheme based on pay band or salary, or allocate a limited number of discounted staff places, doctors and nurses are charged to work unsociable hours at a time when everyone is facing economic difficulties.*

Chapter 12 Monitoring;

Suggested changes

Add KPI for reducing health inequalities, with indicators aligned to those being developed for the Health Inequalities Strategy

Justification for policy recommendations

The Mayor has a statutory duty to have a Health Inequalities Strategy, which will be released at around the same time as the London Plan. Ensuring the two plans are aligned will make for a better integrated and more coherent vision for London.

Suggested changes

Targets are lacking throughout the plan for environmental ambitions. This makes holding the mayor, and future mayors, to account for delivery more difficult.

Justification for policy recommendations

A lack of targets and deadlines to achieve them makes it difficult for those scrutinising the Mayor to track progress and ensure delivery is on track. Without milestones set at particular dates, if targets are missed it will be difficult to identify where things went wrong and to learn lessons.

Suggested changes

Understanding of how and when the comprehensive information relating to the London Plan can be accessed would be useful for ongoing scrutiny.

Justification for policy recommendations

Paragraph 12.1.2. and 12.1.3 explains that there will be fewer more strategic KPIs of the London Plan compared to previous years reflecting the Mayor's strategic priorities and that there will be comprehensive set of complementary and more detailed data and performance measures which sit alongside the KPIs in the AMR.

ⁱ FROM THE ENGLISH HOUSING SURVEY GLOSSARY: Bedroom standard: The 'bedroom standard' is used by government as an indicator of occupation density. A standard number of bedrooms are calculated for each household in accordance with its age/sex/marital status composition and the relationship of the members to one another. A separate bedroom is allowed for each married or cohabiting couple, any other person aged 21 or over, each pair of adolescents aged 10-20 of the same sex, and each pair of children under 10. Any unpaired person aged 10-20 is notionally paired, if possible, with a child under 10 of the same sex, or, if that is not possible, he or she is counted as requiring a separate bedroom, as is any unpaired child under 10.

This notional standard number of bedrooms is then compared with the actual number of bedrooms (including bed-sitters) available for the sole use of the household, and differences are tabulated. Bedrooms converted to other uses are not counted as available unless they have been denoted as bedrooms by the respondents; bedrooms not actually in use are counted unless uninhabitable. Households are said to be overcrowded if they have fewer bedrooms available than the notional number needed. Households are said to be under-occupying if they have two or more bedrooms more than the notional needed.