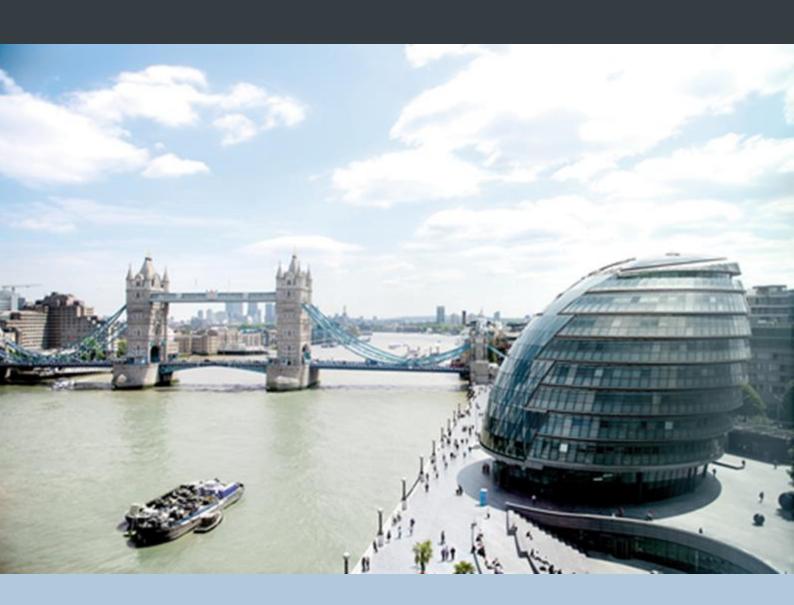# LONDONASSEMBLY

London Plan consultation response

Holding the Mayor to account and investigating issues that matter to Londoners

LONDONASSEMBLY

Planning Committee Members

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The Planning Committee's role is to scrutinise the detail of the London Plan, the Mayor's use of his planning powers and the strategic planning challenges facing London.

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1. Introduction and overview

Introduction to this consultation response

1.1   The Assembly's Planning Committee is responding to this Mayoral consultation on the Draft New London Plan.

1.2   This response incorporates submissions from most of the Assembly's committees on policy proposals within their respective terms of reference.

1.3   The Planning Committee's comments, which appear alongside the other committees' are based on several sources, including:

- Published reports on relevant issues that have been agreed by the Committee since 2014[i].

- Comments on previous Mayoral London Plan related documents[1] and Infrastructure Plan[2] consultations

1.4   **The London Assembly is the elected body, part of the Greater London Authority, that scrutinises the activities of the Mayor of London and has the power, with a two-thirds majority, to amend the Mayor's annual budget and to reject the Mayor's draft statutory strategies.**

1.5   **This response has been prepared with the expectation that London Assembly Members, representing all Committees and party groups, will be invited to participate in the Examination in Public to elaborate on these written comments on behalf of Londoners.**

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[i] Relevant examples cover the overall management of London's growth, tall buildings, and offsite manufactured housing.

London Assembly overview of the draft London Plan proposals

1.6   The Mayor is required to publish a Spatial Development Strategy (SDS) and keep it under review. The SDS is known as the London Plan. As the overall strategic plan for London, it sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years.

1.7   The general objectives for the London Plan, and the process for drawing it up, altering it and replacing it, are set out in the Greater London Authority Act 1999 (as amended) and supporting detailed regulations.

1.8   The London Plan since 2004, and its subsequent amendments, has proved largely successful in providing the strategic direction for London's development. One of the essential components for this success has been the need to base this on the GLA Act which gives the GLA three principal purposes:

- the promoting economic development and wealth creation in Greater London

- promoting social development in Greater London

- promoting the improvement of the environment in Greater London.

1.9   All Mayoral policy must have regard to these principal purposes and the crosscutting themes of:

- the health of Londoners

- equality of opportunity

- its contribution to sustainable development in the UK.

1.10   This Plan seeks to continue the overall strategic aim of accommodating as much of the capital's expected growth within London's boundaries without encroaching on the Green Belt or protected open spaces. However, this Plan, based on the underlying assumptions of even higher household growth that is detailed in the latest Strategic Housing Market Assessment (SHMA)[3], focusses on the importance of delivering housing more than any other previous Plan.

1.11   In accepting the challenge of delivering higher growth within the principles of a 'compact city' the Mayor has had to face the reality of making the best use of London's land, in effect making 'space work harder' to deliver the 'Good Growth' the Mayor has put at the centre of his strategic approach.

1.12 This approach requires higher density (though not necessarily high rise), mixed-use mixed-income development to be located near well connected transport nodes and town centres to improve access to jobs and services. This should allow London to accommodate the anticipated scale of population growth within sustainable patterns of development, while regenerating existing communities. Large numbers of people can sustain schools, local shops and other facilities in a way that a more dispersed community cannot.

1.13 A logical consequence of continuing the compact city approach therefore means increasing the density of some parts of the suburbs, regenerating estates, and building new and expanded towns on brownfield land within the capital's boundaries.

1.14 The Assembly supports the Mayor's 'Good Growth' ambitions but notes the challenges they pose for London's local authorities who will be required to deliver a significant amount of preparatory work in order for the strategic policies to work effectively.

1.15 The planning system in the UK is plan-led. Planning law requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise. The London Assembly supports this approach that has been a feature of London Plans since 2004.

1.16 However, the Assembly notes the introduction of a number of proposals that will require significant investment in a range of studies, reviews and assessments that can put the strategic London Plan policies into a local context.[ii] This, in itself, is a welcome contribution to the sustainable development of the capital through the plan-led system, but serious concerns remain that the boroughs have insufficient resources to undertake this work – and there is no indication of alternative funding resources that might deliver this capacity for local authorities.

1.17 For the Mayor's proposed policies to work effectively, the boroughs would need to have all of these studies in place by the end of 2019 – when the new Plan comes into force. Developers will, undoubtedly, be ready to submit proposals by then but the Assembly has serious concerns that the boroughs will not be in a position to consider those proposals with the required local assessments in place. The boroughs will need significantly more assistance from the Mayor ranging from specific Supplementary Planning Guidance to density models and even support to providing the specific technical skills to undertake local assessments.

[ii] For example, area design codes, evaluations of growth capacity, growth forecasts, character analyses, development management plans and open space needs assessments

1.18　The Mayor needs to address these issues now, while the Plan is still in draft form.

2. Planning for London's Future (Good Growth policies)

Strategic vision and overview – Good Growth

> ## Recommendations - General
>
> The Mayor's Good Growth policies represent his strategic objectives for London and should run through all planning policy. This is particularly important where the Mayor seeks to manage growth that is socially and economically inclusive and environmentally sustainable.
>
> Throughout the Plan's policies there are references to circumstances where development proposals should be resisted (for example, Policy H12 Housing size mix part B which states that 'Generally, schemes consisting mainly of one-person units and/or one bedroom units should be resisted'). The Mayor needs to strengthen these policies by reference to his core 'good growth' policies. This should add weight to policy and support boroughs to deliver the type of growth the Mayor is proposing.

2.1 The Assembly recognises the importance of ensuring the projected record levels of growth – and high housing targets – are accommodated sustainably. In line with the principles of 'Good Growth' it is important that development that is not sustainable – or in accordance with Good Growth – is prevented. The Plan, therefore, needs to ensure policy in chapters 2 -10 are referenced to GG policies to provide extra protection against unsustainable development.

2.2 The Assembly notes the scale of expected growth that the Draft New London Plan (DLP) seeks to manage. London's population is projected to increase by 70,000 every year, reaching 10.5 million in 2041, generating the need for 66,000 new homes to be built every year and finding space for 49,000 jobs annually in the Plan period.

2.3 Alongside this expected magnitude of growth, the Mayor proposes to retain the strategic objective of planning London as a compact city – accommodating as much of this growth within London's boundaries without encroaching on the Green Belt or protected open spaces in Policy GG4.

2.4 The Mayor's commitment to accommodating such growth within these parameters provides challenges enough, however, by adopting the principle of 'Good Growth' this Plan elevates the challenges and makes the creative use of London's land the key from which many of the new policies derive.

2.5 Previous versions of the London Plan have set out an overall vision for London and a set of strategic objectives. This version of the Plan appears to establish the Mayor's vision in policy (**Good Growth Policies 1 – 6**). The Assembly understands the concept of 'Good Growth' to mean growth that is socially and economically inclusive and environmentally sustainable and it is the Mayor's intention that these core policies should be taken into account for all planning

and development in London.[iii] **Policy in chapters 2 -10 must therefore be referenced to the Good Growth policies 1-6 to provide extra protection against unsustainable development.**

> ### Recommendations – Policy GG1 Building strong and inclusive communities
>
> **Policy GG1** needs to highlight more actively that policy must be prepared in a collaborative way with local communities and stakeholders.
>
> Early engagement with local people leads to better planning proposals, with Neighbourhood Forums and Neighbourhood Plans providing a particularly good opportunity for communities to shape growth in their areas. Taking advantage of the knowledge and experience of local people will help to shape London's growth, creating a thriving city that works better for the full diversity of its inhabitants.
>
> This should be reflected throughout the Plan but is particularly relevant for policies SD1 and SD10.
>
> **Policies GG1 B and C** need to be specific in signalling policy in the Plan recognises the special needs of families and children (in addition to references already contained in Policy GG1 F)
>
> **Policies GG1 D and E** need to make reference to the importance of heritage in town centres and the need to ensure new development works with London's existing historic fabric.

2.6   The Plan needs to focus on better ways of involving the community to ensure the required intensity of development is positively welcomed rather than feared or opposed if the whole of London is to play a full role in accommodating London's growth. The Plan needs to highlight how policy can ensure proactive engagement of community and stakeholders in the planning process to ensure that they are empowered to engage and the outcomes take into account local aspirations and that communities are on board.

2.7   In previous Plans, much of the emphasis on managing London's growth has focussed on physical and spatial aspects – density and locations of the new housing needed. The impact of the way growth is managed on the people of London themselves has been relatively ignored. This may, or may not, influence where people choose, or are able, to live.

[iii] Draft London Plan, paragraph 0.0.29

2.8 London's demographic profile (in terms of age and household structure) is very different from the rest of the country as a whole:

- One quarter of inner London's population is aged 25 – 34 (13 per cent in England)

- There is a higher proportion of children aged 0 to 4 in London than the rest of England

- More outer London households than inner London households have children

- London also has proportionally fewer people aged over 50, particularly in inner London

- Households with children are projected to comprise 31 per cent of the projected population growth (to 2035), and so 279,000 new family homes will be needed in the next 20 years.

2.9 The Planning Committee has seen evidence[4] to suggest that:

- London is in danger of now being 'segregated' in terms of the ability of different household types and ages to find neighbourhoods with the right infrastructure to meet their needs.

- Inner London is increasingly now suitable only for young working people and small households

- Outer London might now be the only place where families and older people can live affordably and sustainably.

2.10 It is vital, therefore, that the principles of Good Growth recognise the special requirements of families and children in London. Good Growth requires specific policies to enable families to be able to live and thrive across London.

2.11 The Plan notes that "London's historic environment, represented in its built form, landscape heritage and archaeology, provides a depth of character that benefits the city's economy, culture and quality of life."[iv]

2.12 One of the key challenges in the Draft Plan is to manage the predicted growth in a way that conserves and enhances the historic environment and heritage assets, and improves access to the heritage assets, landscapes and archaeology within the London area.[v]

[iv] Draft London Plan 2017, paragraph 7.1.1
[v] Draft London Plan 2017, Policy HC1 Heritage conservation and growth

2.13 London's heritage gives identity to many places, so is a key to local character and distinctiveness. **GG1 should be amended to reflect the positive contribution of heritage to community cohesion, identity and sense of place for London's growth (see further comments in section 7 on Heritage and Culture).**

> ## Recommendations – Policy GG2 Making the best use of land
>
> **Policy GG2 B** needs to be amended to make it clear that, while intensification is an overall objective, increases in density need to make reference to local character and the realistic potential for delivering the required supporting infrastructure (cross referencing where appropriate Policy D6 and S1). See also comments on **Policy D6.**
>
> As set out in the recommendation on GG1 above, this policy must also highlight more actively that policy, in relation to density increases, must be prepared in a collaborative way with local communities and stakeholders.

> ## Recommendations – Policy GG3 and Health equity impact assessments
>
> We would like to see the specific inclusion of health *equity* impact assessments as well as health impact assessments.
>
> The Policy should read: '**Assess the potential impacts of development proposals on the health and wellbeing of communities, in order to mitigate any potential negative impacts and maximise positive impacts in order to help reduce heath inequalities, for example through the use of health equity impact assessments**'.

2.14 We strongly welcome the inclusion of a commitment to creating a healthy city as an underpinning principle for future growth in the capital. We welcome the recognition of the critical role that the London Plan can play in tackling the wider determinants of health, and the urgency of the need to effect changes that will reduce the stark health inequalities that persist in London. We are also pleased that the need to focus on both mental and physical health and wellbeing is included in this policy.

2.15 We would like to see the changes to **Policy GG3 Creating a healthy city**. In addition to *mitigating potential negative impacts*, the Assembly would like to see a stronger commitment to using the London Plan as a mechanism to **maximise the positive impacts of** development proposals on reducing health inequalities. The Assembly would like to see the specific inclusion of health *equity* impact assessments as well as health impact assessments.

2.16 The Health Committee shares the view of the King's Fund that the Mayor's policies should not conflate the distinct goals of 'health for all' and reducing health inequalities. Health equity impact assessments provide for a more specific analysis of the potential impact of proposals on reducing health inequalities than standard health impact assessment methodology.

2.17 Health Equity Impact Assessment methodology allows for consideration of other population groups who are vulnerable to unfair differences in health outcomes, such as people living in different socio-economic groups, those involved with the criminal justice system, homeless people and asylum seekers and refugees, as well as social determinants of health such as employment and education. A robust health equity impact assessment should be carried out on the proposals within the London Plan, and this methodology should also be promoted to boroughs to help in their determination of development proposals. **The Assembly therefore suggests that Supplementary Planning Guidance is produced to help assist boroughs in carrying out both health equity impact assessments and health impact assessments. This will also help to ensure a consistent standard of assessment across London.**

2.18 The recommended changes should be considered alongside the recommended changes to key performance indicators. Please see Chapter 12 Funding and Monitoring.

> ## Recommendations – Good Growth and the environment
>
> The London Plan should make much clearer the importance of environmental sustainability and the quality of London's environment to Good Growth. This could be through a headline definition of Good Growth, or within the paragraphs headed Planning for Good Growth: 1.0.4 to 1.0.8 in the Draft Plan, as well as in the policy sections. This should set an appropriately high ambition for environmental quality, and leadership in the global effort towards urban sustainability.
>
> **Policy GG3** should address the need to reduce pollution, especially air pollution, to protect Londoners' health.
>
> **Policy GG4** should make explicit reference to the environmental sustainability aspects of homes, including carbon dioxide emissions, sustainable drainage, resilience to heat and cold, and green infrastructure. This could be through reference to policies GG3 and GG6, but GG4 should not omit all reference to these important aspects of home delivery and quality.
>
> **Policy GG5** (and the Economy chapter of the Plan itself) should address the environmental sustainability of the economy and the importance of the environmental sector to London's economy, including Good Growth, the

> role of green tech, and the business of reducing resource use, re-using materials and recycling.
>
> **Policy GG6** should directly address water management, including water supply for London's growth, and the need to address water efficiency and especially drainage and flood risk not just in building design but in spatial planning and through integrated water management strategy.

2.19 In the existing London Plan, the Mayor's vision is stated (paragraph 1.52) as:

> "London should excel among global cities—expanding opportunities for all its people and enterprises, achieving the highest environmental standards and quality of life and leading the world in its approach to tackling the urban challenges of the 21st century, particularly that of climate change."

2.20 Its six objectives under that vision include (paragraph 1.53):

> "**A city that becomes a world leader in improving the environment** locally and globally, taking the lead in tackling climate change, reducing pollution, developing a low carbon economy, consuming fewer resources and using them more effectively."

2.21 In the proposed replacement London Plan, this vision and objectives are replaced by six Good Growth policies. None of them makes a headline reference to the environment. The explicit environmental content in the Good Growth policies includes:

- **GG2D Making the best use of land**

- **GG3E and GG3F Creating a healthy city**

- **GG6A and GG6B Increasing efficiency and resilience**

2.22 The Deputy Mayor for Planning, Regeneration and Skills told us that there is no headline environmental objective because environmental objectives are distributed through the Plan. However, the environmental objectives seem concentrated in certain sections of the plan, and particularly within certain of the Good Growth policies. The Environment Committee recommends an explicit reference to the environment is included, as well as being threaded throughout the document.

2.23 Policy GG4 'Delivering the homes Londoners need' does not make any reference to environmental sustainability aspects of homes, including energy efficiency, sustainable drainage, climate resilience or the impact of home building on green infrastructure. These issues are mentioned within GG2, GG3 and GG6 rather than GG4, or are omitted from the Good Growth policies altogether. The Environment Committee recommends explicit references to

energy efficiency, climate resilience and impact on green infrastructure are included.

2.24   Policy GG5 'Growing a good economy' does not make any reference to the circular economy, the low-carbon economy or green tech. These are mentioned within GG6 if at all. In the body of the Draft Plan, there is little or no reference in Chapter 6, and its policies E1-11, to the green or environmentally sustainable economy. The Environment Committee recommends an explicit reference to the circular economy is included.

2.25   Local pollution, including air quality, is not mentioned in the Good Growth policies at all, which is somewhat surprising given the prominent place of air quality in the early initiatives of the current Mayoralty. The Environment Committee recommends an explicit reference to air quality is included.

2.26   Also missing is a holistic understanding of water management. There is no reference at all to water supply, and all other water management aspects are contained within a clause on the design of buildings and infrastructure. This is a serious omission in a strategic plan for a city expected to grow to over 10 million inhabitants in a region that is already water-stressed. The Environment Committee recommends an explicit reference to water management is included.

2.27   The need to reduce resource consumption and to make better use of resources is implicit in the phrase 'circular economy' in GG6 but, as this phrase is little understood, the reference is unlikely to come through for many readers. The circular economy should be amplified and explained.

2.28   Also missing from the Good Growth policies is the overall vision and level of ambition contained in the language of the existing London Plan, such as 'excel among global cities', 'highest environmental standards' and 'becomes a world leader in improving the environment'.

3. Spatial Development Patterns

Policy SD1: Opportunity areas

Recommendations – strengthening the policy

The London Assembly welcomes many of the proposals put forward in Policy SD1, but it considers the policy could be strengthened further, by amending:

- **SD1 A4** – encouraging innovative thinking at an early stage to bring forward funding proposals for major supporting infrastructure provision
- **SD1 B9** – ensuring that, following meaningful public and stakeholder engagement on planning frameworks, any significant proposals to increase development densities should be subject to proper re-consultation to ensure local acceptance.
- **SD1** – add a new reference (SD1 A9) to ensure that existing features particularly valued by local communities are identified and incorporated
- **SD1 B** – delete part 4 and substitute with: Plan for environmental enhancements, attractive and sustainable neighbourhoods at appropriate densities that respect surrounding character and heritage assets
- **SD1 B6** – amend, to ensure flexibility regarding capacity with respect to heritage considerations, amend at the end to read: '… capacity set out in Figures 2.4 and 2.12 subject to satisfying policies HC1 and HC2
- **New SD1 A9** – there should be a new policy that requires Opportunity Areas to consider, at an early stage of development, how infrastructure requirements should be managed to accommodate the long-term sustainable development of the areas.
- **Policy SD1, Opportunity Areas, supporting text (page 30)** – needs amendment to reflect the fact that greater partnership working is needed in the planning of the Opportunity Areas (see paragraphs 3.14 and 3.15 in the section below).

Add cross-reference to text on "early engagement with local people leads to better planning proposals" as set out in **Policy GG1**.

3.1   Opportunity Areas are the capital's most significant locations with development capacity to accommodate new housing, commercial development and infrastructure, of all types.

3.2   Opportunity areas (and Intensification areas) were introduced in the first London Plan. Opportunity Area Planning Frameworks (OAPF) set out planning, regeneration and design guidance for major growth centres in London. Once drafted (in partnership between the Mayor, boroughs and

other strategic partners), consulted on and published, they form supplementary guidance to the London Plan.

3.3   The Planning Committee has noted that some Opportunity areas, such as Kings Cross, are well regarded, while others have been criticised for being over developed and not adhering to the published principles.

3.4   Many of the Opportunity Areas rely on significant infrastructure investment (particularly transport) to allow them to support the number of new homes at the densities London needs. However, the approaches to securing the planning and funding needed have been variable in their success and timescale.

3.5   Construction of the Northern Line Extension (NLE) at Vauxhall took nine years to start after the original transport options study. The full cost of the NLE is expected to be up to £1 billion, which is being funded entirely through contributions from the developments in the area benefitting from the extension. An innovative funding package has been agreed between the Mayor of London and Government, which includes the creation of an Enterprise Zone from 2016, for a period of 25 years.

3.6   This approach can be contrasted with the London Riverside Opportunity Area that contains Barking Riverside and has planning permission for up to 10,800 new homes.[vi] Here, significant delays in providing the necessary infrastructure have prevented delivery of a significant housing site.

3.7   Previously, the Planning Committee has concluded that the Mayor needs to push hard on getting the infrastructure needed to support new homes in London's Opportunity Areas. More innovative thinking is required to bring forward funding proposals speedily as in Vauxhall as opposed to the example of Barking Riverside.

3.8   Opportunity Areas have the capacity for higher density housing, but only where they are supported by adequate infrastructure and where the proposals are properly consulted on and adhered to.

3.9   The Opportunity Area Planning Frameworks (OAPFs) have not, unfortunately, been effective in bringing forward sustainable development, as demonstrated by the impacts of development at Vauxhall Nine Elms and at Waterloo on surrounding heritage assets. While this is partly an implementation issue it is also reflective of the quality of engagement. Looking at alternative options through OAPFs can provide the evidence needed for a local plan, without pre-empting the statutory process.

[vi] As well as healthcare, shopping, community and leisure facilities

3.10 The new Plan needs to focus on better ways of involving the community to ensure the required intensity of development is positively welcomed rather than feared or opposed if the Opportunity Areas are to play a full role in accommodating London's growth.

3.11 As indicated above (policy GG1. B) there is a need for a substantial and robust policy requiring community engagement. The Assembly suggests this policy is amended to seek to ensure proactive engagement of community and stakeholders in the planning process to ensure that they are empowered to engage and the outcomes take into account local aspirations and that they are on board.

3.12 This policy also requires amendment to provide specific protection to heritage assets and to reflect the emphasis on place-making elsewhere in the Plan. This is necessary in view of the well-documented concerns of UNESCO and others regarding the harm from tall buildings in Opportunity Areas affecting the Outstanding Universal Value of London's World Heritage Sites. Place-making must also be key to ensuring successful new communities are created.

3.13 A further concern is that the assumptions that have led to the figures are not clear and flexibility should be built in where there are sensitive historic environments within the settings of the Opportunity Areas.

3.14 For Opportunity Areas to be sustainable, long-term policy should require boroughs and private sector providers to anticipate future demand, deliver infrastructure ahead of later phases of development and stimulate investment that provides benefits to the range of stakeholders involved.[5]

3.15 The Olympic Delivery Authority is an excellent example of how to manage the delivery of complex long term projects. The Planning Committee heard how it planned in flexibility on the basis of providing resilience and in doing so could future proof infrastructure backed with a business case for relatively higher levels of spending than would normally seem economically viable.[6] Specific examples relate to the local energy system that is able to both adapt to the need for increased future demand and also unlock the development potential of surrounding sites.

Recommendations – Olympic Legacy

We recommend the Mayor makes reference to securing the regenerative legacy of the Games in the relevant policies in the draft London Plan, such as in Policy SD1 Opportunity Areas, SD10 Strategic and Local Regeneration, and elsewhere as relevant. The Mayor should also make explicit what the London Legacy Development Corporation's (LLDC) role is in supporting legacy work at a sub-regional level to achieve 'convergence'.

3.16 In November 2017, the Regeneration Committee published its report *Relighting the torch: securing the Olympic legacy*,[7] which looked at progress towards improving the life chances of people living in east London in line with the rest of London, a process referred to as 'convergence'. The report found that while progress has been made in some areas, more work is needed to achieve convergence. Some of the convergence targets, such as obesity levels, have actually worsened since the Olympic Games. To ensure convergence is achieved, the LLDC needs to provide leadership to support and strengthen the work of boroughs in improving the life chances of those living in east London.

3.17 The Regeneration Committee recommended that the Mayor 'keep the momentum going by ensuring that a commitment to convergence features in his new London Plan.'

3.18 Recognising the Olympic Legacy would give legitimacy for the future work at a sub-regional level (such as Growth Borough Partnership and Local London) to achieve convergence, and recognise the work carried out to date. The Mayor should also consider what resource and support can be made available to boroughs to secure the legacy of the Games.

Policy SD2: Collaboration in the Wider South East

Recommendations

The Assembly strongly supports the recognition of the need for constructive engagement with the wider south east to manage London's growth in a regional context.

Policy SD2 E should therefore be amended to establish a more formalised arrangement that might provide confidence to authorities outside London that taking some additional growth would be supported by the Mayor in terms of assistance with new infrastructure provision.

3.19 While, overall, the London Plan has identified sites for additional housing capacity to meet the housing need for the next 10 -20 years, for a variety of reasons some of this notional capacity may be unrealistic.

3.20 Not all of these sites might come forward for development. For example, sites in Inner London may be better allocated for supporting infrastructure; brownfield sites may be unviable without transport infrastructure for which there is no funding; or suburban town centres and sites might deliver insufficient density due to issues of accessibility or damage to existing character.

3.21 The Inspectors Report into the current London Plan recommended that the Mayor should engage local planning authorities beyond the GLA's boundaries

in discussions regarding accommodating sufficient numbers of new homes.[8] This would require a shift in the strategy of managing growth within London's boundaries.

3.22 Directing London's growth away from its current boundaries might require a joint strategic plan on a regional level covering London as well as the Home Counties.[9] The Government does not intend to re-impose regional plans[10] but there is a clear expectation, through the Duty to Co-operate as set out in the Localism Act 2011, to ensure that all of the bodies involved in planning work together on issues that are of bigger than local significance.

3.23 The Mayor must therefore build the case and convince sceptical authorities outside of London.

> **Recommendations – engagement**
>
> We would like to see a greater focus on ensuring local people are engaged in planning and during development. As such we would like to see the following wording changed on Policy SD1 A1c: "support regeneration **through genuine engagement with local residents and stakeholders to ensure economic vitality and development of relevant social infrastructure**".
>
> We would also like to suggest the following addition policy as SD1 B2: "**support local stakeholders to meet local aspirations in Opportunity Areas, including providing guidance and ensuring effective engagement during development**".

3.24 The Regeneration Committee has been consistent in its support for engaging with communities on major regeneration projects. This has been a recurring theme that the committee has heard throughout its investigations, most recently in its 21 November 2017 meeting on town centre regeneration[11] and at an informal roundtable on the OPDC on 17 January 2018. In particular, the committee's meeting on 1 March 2016 on public consultation and its impact on regeneration projects highlighted how a failure to properly consult with people lead to uncertainty for communities and resistance to development proposals at Brent Cross Cricklewood.[12]

3.25 By highlighting the importance of community engagement in the London Plan, developers in Opportunity Areas are more likely to consult with local people. This could help improve the quality of proposed developments and improve relations between developers and communities.

Policy SD6: Town centres

3.26 We are concerned that Policy SD6 part I on social infrastructure is insufficient to ensure both adequate and accessible provision of social infrastructure in London's town centres, which is needed in light of the intensification of housing development in town centres.

> **Recommendations – social infrastructure**
>
> **Policy SD6** should state that "the provision of social infrastructure should be enhanced, **particularly where it is necessary to support identified need from town centre and local residents. Facilities should be located in places that are easily accessible to all users, taking into account accessibility by public transport, walking and cycling (Policy S1 Developing London's social infrastructure) and accessibility to meet the needs of all Londoners (Policy D3 Inclusive design).** Facilities should also be located in places that maximise surrounding town centres uses".
>
> **Policy SD6** also makes no reference to the engagement of local communities and stakeholders in the provision of social infrastructure. Policy SD6 should therefore be further amended to: "Facilities should also be located in places that maximise surrounding town centres uses. **Local residents and stakeholders should be engaged with on plans for new social infrastructure in town centres**".

3.27 In the National Planning Policy Framework (NPPF) it is unclear how far social infrastructure is an appropriate town centre use. Paragraph 23 states that Local Plans 'should allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres'[13]. However, the glossary in the NPPF guidance[14] does not define social infrastructure as a type of town centre use.

3.28 Policy SD6 part D which argues that town centres are particularly suitable for smaller households, renters, older people and students, needs to be connected more strongly to policies on social infrastructure. These new uses and intensified residential development are likely to increase demand for social infrastructure.

3.29 If residential development is to be intensified in town centres, there needs to be appropriate social infrastructure to support these new communities. As recognised in the Plan itself "Social infrastructure plays an important role in developing strong and inclusive communities."[15]

3.30 Using the sequential test in the NPPF, main town centre uses such as retail may be prioritised above the provision of social infrastructure. This approach takes precedence over the current 'enhancement' of social infrastructure in town centres in Policy SD6 part I meaning that social infrastructure may

instead be forced onto sites away from the town centre and the Plan may not achieve town centres that are the "strong, resilient, accessible, inclusive and viable hubs for a diverse range of uses" it aspires.

3.31 With greater housing intensification and specialist needs, this could place increased strain on existing social infrastructure in town centres and also create access problems for less mobile groups.

> **Recommendations – impact of intensification**
>
> We welcome the recognition of the social value of town centres and high streets (2.1.6) and in Policy SD8 B1. The Regeneration Committee further suggests that **Policy SD8 B1** Development Plans, is reworded to recognise this social value better and make a clearer reference to high streets and areas and high streets immediately outside of a town centre boundary, as town centre intensification is likely to impact on them.
>
> **SD8 B3** should also be amended to read:
>
> "Develop policies for the edge and fringes of town centres, to support thriving high streets at the edges of and outside town centre boundaries, revising the extent of shopping frontages where surplus to forecast demand and introducing greater flexibility, permitting a range of non-residential uses particularly in secondary frontages taking into account local circumstances".

3.32 In a letter to the Mayor, dated January 2016, the Regeneration Committee recommended that in the next London Plan, the GLA should take greater account of the impact that development and intensification has on neighbouring areas. While this recommendation was made in the context of Intensification Areas, the same lesson applies to intensification in town centres, and particularly its impact on surrounding high streets as well as the wider town centres network.

3.33 'High Streets for All', a study commissioned by the GLA, noted the importance of London's high streets as accessible sites of economic activity, particularly providing affordable business space for smaller businesses.

3.34 Without the protection of a town centre designation, high streets are more vulnerable to pressures from development, such as that of permitted development rights.

Policy SD10: Strategic and local regeneration

3.35 By definition, areas of strategic and local regeneration are generally deprived[vii] and the necessary level of community involvement in policy development needs borough support and resourcing.

3.36 It is widely recognised that a lack of control over local decision-making is a cause of dissatisfaction and alienation, so it is vital that these areas are resourced.

3.37 While some Strategic Areas for Regeneration fall within Opportunity Areas, many do not and in those areas there will be no specific involvement by the Mayor. Although the Mayor identifies these as Strategic Areas for Regeneration, he is not giving himself a role in supporting and resourcing them, nor directing boroughs to do so.

3.38 See comments above for recommended amendment to SD1 B9. The new Plan needs to focus on better ways of involving the community to ensure the required intensity of development is positively welcomed rather than feared or opposed if areas for strategic and local regeneration are to play a full role in accommodating London's growth.

3.39 The Plan's objectives for 'Good Growth' depend on effective and early community engagement in development choices. Neighbourhood Forums have become an important tool in increasing public participation, community engagement and local influence in shaping neighbourhoods. The Mayor should explicitly recognise the role of neighbourhood forums in helping

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[vii] Those areas covered in SD10 Strategic and local regeneration are amongst the bottom 20 per cent most deprived areas in the country.

deliver the London Plan's objectives. Challenging objectives to increase housing numbers and develop more small sites will depend on securing community consent through effective local engagement.

4. Design

Context

4.1   Design quality is fundamental to Good Growth. To accommodate this growth, London is seeing much more complex and denser schemes than in the past: some planned developments will build over 1,000 units per hectare. Making a success of these types of densities will require careful attention, guidance and scrutiny of design.[16]

4.2   Design review by independent professionals can be a powerful way of ensuring that the design of new buildings enhances London's cityscape as well as meeting users' needs, and is recommended in the NPPF. But there are differing approaches with varying results. This risks undermining Good Growth.

4.3   London needs more extensive and consistent use of design review. In line with the forthcoming Design Review Charter, existing design review panels that are delivering well should not be duplicated, and arrangements should be proportionate to the scale and impact of the scheme in question.

4.4   Good Growth calls for an active approach to shaping the changing character of places, rather than simply a reactive response to proposals. This process of 'place-shaping' requires a wide range of skills – including planning, urban design, architecture, landscape architecture, engineering, conservation, project management, community engagement. But 91 per cent of London Boroughs say they need more of these skills in their planning departments and the proportion of architects working in the public sector has fallen from 50 per cent in the mid-70s to less than one per cent today.[17]

4.5   Whilst most local authorities have clear visions for their areas, planning and regeneration departments have been depleted at a time of constrained funding. Many lack the resources and skills – coordinating investment, shaping development, galvanising communities and strengthening the character of a place – needed to achieve their ambitions.

4.6   This Plan provides the framework to address the key planning issues facing London. This allows boroughs to spend time and resources on those issues that have a distinctly local dimension and on measures that will help deliver the growth London needs. This includes area-based frameworks, action plans and Supplementary Planning Documents, site allocations, brownfield registers and design codes.

4.7   The Assembly again notes the introduction of a number of proposals that will require significant investment in a range of studies, reviews and assessments

that can put the strategic London Plan policies into a local context.[viii] This, in itself, is a welcome contribution to the sustainable development of the capital through the plan-led system, but serious concerns remain that the boroughs have insufficient resources to undertake this work – and there is no indication of alternative funding resources that might deliver this capacity for local authorities.

Policy D1: London's form and characteristics

Recommendations

Policy D1 should be cross referenced to **H2 B2** (area-wide design codes)

Policy D1 should be cross referenced to **GG1** that is itself amended to emphasise the importance of design for accommodating increased density

4.8   The Planning Committee fully supports the need identified in Policy D1 B1 for development to respond to local context 'that respond successfully to the identity and character of the locality' – however, it is unclear about what this means in policy terms. For example, paragraph 3.1.2 sets out that it 'should complement the existing streetscape and surrounding area'.

4.9   However, it is not clear how this relates to Policy H2 B1 that requires boroughs to recognise that 'local character evolves over time and will need to change in appropriate locations to accommodate additional housing provision and increases in residential density'. This confusingly suggests that development should complement the existing streetscape but also that it should change the local character.

Policy D2: Delivering good design

Recommendations

The Mayor needs to review mechanisms for effective implementation of **Policy D2**: Delivering good design. The principles of **Policy D2** are sound, and a necessary condition for delivering Good Growth, but it is questionable whether such requirements are realistic, affordable and implementable for local authorities.

The Mayor needs to clarify policy to guide boroughs, applicants and the community as to how development proposals would be dealt with in the absence of the conditions required by **Policy D2 A-H.**

[viii] For example, area design codes, evaluations of growth capacity, growth forecasts, character analyses, development management plans and open space needs assessments

> The Mayor should update the **Strategic Housing Land Availability Assessment (SHLAA)** character map and the **London Plan Character and Context SPG (2014)** in order to support boroughs to undertake a more active approach to considering good design and capacity for a local area's growth.

4.10 Delivering good design is essential in ensuring the Good Growth principles are adhered to in the management of growth at the higher densities required by the Plan.

4.11 Understanding an area's capacity for growth (D2 A) and determining an area's capacity for growth (D2 B) will be crucial to ensure the most efficient use of land is made 'so that the development on all sites is optimised'.[18]

4.12 Supporting text in paragraphs 3.2.1 – 3.2.10 sets out guidance for undertaking the requirements of Policy D2: this includes the use of area evaluation, evidence gathering, digital modelling and the use of design review and design scrutiny. Paragraph 3.2.6 sets out the role of the Mayor's Design Advocates in assisting in design review, capacity building, commissioning and advocacy.

4.13 However, local authorities may not have the skills to effectively review and scrutinise design. The Mayor's publication "Good Growth by Design" notes that: 'Good Growth calls for an active approach to shaping the changing character of places, rather than simply a reactive response to proposals. **This process of 'place-shaping' requires a wide range of skills – including planning, urban design, architecture, engineering, conservation, project management, community engagement. But 91 per cent of London Boroughs say they need more of these skills in their planning departments and the proportion of architects working in the public sector has fallen from 50 per cent in the mid-70s to less than one per cent today'.**

4.14 Supporting boroughs to undertake this more active approach should be a priority for the Mayor.

4.15 We suggest the Mayor should update the current SHLAA character map (it is now somewhat out of date, being based on 2001 UK Census data). As noted in the Mayor's own evidence base[19], there may be a number of ways in which the Character Map can be updated to provide a more appropriate approximation of notional housing capacity for use in local policy.

4.16 The Mayor needs to update the London Plan Character and Context SPG (2014) that outlines the principles of character, its defining features and guiding principles for considering the character of an area that also highlights that character is about people and communities, and that places are connected and overlap.

Policy D4: Housing quality and standards

Recommendations

Policy D4 should contain a presumption that larger flats (suitable for families) should be located no higher than the fifth floor of all buildings. Where possible, larger units should be located in the portions of the building or site overlooking common outdoor play areas and recreational amenities.

The Mayor should amend **paragraph 3.4.2** to remove the guidance implying boroughs should resist dwellings with floor areas that are significantly above those set out in **Table 3.1** – particularly for family sized homes to mitigate the impacts of potential future overcrowding.

Policy D4 G, should be amended to change "should" to "must" in relation to design with adequate and easily accessible storage space. The Draft Plan (**paragraph 3.4.12**) sets out that a guidance document on housing standards will be produced. We therefore recommend that this guidance should reflect effectively, and in detail, the London Waste and Recycling Board's advice on provision for recycling in flats.

4.17 The Assembly has long been concerned to ensure the provision of larger, family housing in London.

4.18 Existing policy and guidance recognises the inherent benefits of larger family housing being provided at relatively low densities. The Housing SPG states that in broad terms, higher densities will be more suitable for households without children and will require less open space and play provision.[20]

4.19 Previous Planning Committee work has concluded that to work effectively in the long term, family homes need to offer levels of amenity approaching those provided by single-family houses at ground level.[21] Key considerations include providing:

- private open space of sufficient size for the whole family and visitors

- a child-friendly environment and appropriate levels of play space.

- limits to the number of dwellings sharing each floor and each access core

- good circulation spaces above the third floor

- adequate levels of visual and acoustic privacy

4.20   The overall shift to higher density development will provide a challenge for family homes in developments with a mix of sizes. Policy D4 should contain a presumption in favour of building larger flats (suitable for families) on the fifth floor or below of tall buildings. Where possible larger units should be located in the portions of the building or site overlooking common outdoor play areas and recreational amenities.

4.21   This would lead to more scope for families to be housed on the lower floors of tall buildings. This is important as evidence shows that children fare better where there is opportunity to play independently (Evans et al 2003) and that parents are happier to allow children to play where they can overlook the space at a comfortable distance to allow informal supervision.

4.22   The Assembly supports the Mayor's view that ensuring new homes are of adequate size and fit for purpose is crucial in an increasingly dense city.

4.23   We note the retention of the current Plan's minimum space standards, and support the Mayor's statement that the "space standards [in Table 3.1] are minimums which applicants are encouraged to exceed."

4.24   Confusion arises, however, with the subsequent guidance in paragraph 3.4.2 that "boroughs are encouraged to resist dwellings with floor areas significantly above those set out in Table 3.1".

4.25   This is a confusing signal that does not sit comfortably with the ambitions in, for example, GG1 E (ensuring new buildings are resilient and adaptable to changing community requirements), GG3 (in terms of recognising the impact of overcrowding on health) and the general objectives of GG4 (providing the kind of mixed and inclusive communities that provide for identified needs – in this case larger family households).

4.26   The Assembly is concerned that Policy D4 does not adequately address the issue of growing overcrowding in London. The Assembly notes that a third of children in social housing and a quarter of children in private rented housing live in overcrowded conditions, and notes the devastating impact that overcrowding can have on children and families. The Assembly is concerned that a failure to provide sufficient family-sized homes, of three and four bedrooms, will make this problem worse and not better.[22]

4.27   The Environment Committee welcomes the provision for recycling storage in policy D4 G, and in paragraphs 3.1.8 and 3.4.11, and particularly the reference in the last paragraph to the London Waste and Recycling Board's Waste Management Planning Advice for New Flatted Properties. The committee's work on recycling has identified that having sufficient storage internally to comply with local recycling separation policies is an important factor in successful recycling, especially for flats. The Committee would wish to see Policy D4 G made stronger in this respect and recommends it should be

amended to change "should" to "must" in relation to design with adequate and easily accessible storage space.

4.28 The Draft Plan (paragraph 3.4.12) sets out that a guidance document on housing standards will be produced. The Environment Committee therefore recommends that this guidance should reflect effectively, and in detail, the London Waste and Recycling Board's advice on provision for recycling in flats.

> ### Recommendations – family housing
>
> Policy and guidance should clearly reflect how to address the need for family housing to be accommodated adequately in the higher density development of the future – including the need for and access to open and play space.[23]

4.29 Policy D4 provides a range of guidance on internal and external space. This is welcomed. However, we would wish to see this go further in relation to the particular needs of family housing. Previously, the Planning Committee has identified the special needs of family homes.[24] To work effectively in the long term, family homes need to offer levels of amenity approaching those provided by single-family houses at ground level. Please see paragraph 4.19 above.

4.30 We note that the Mayor intends to produce a single guidance document. This will clearly set out the standards needed to implement Policy D4 Housing quality and standards for all housing tenures, as well as wider qualitative aspects of housing developments. This will build on the guidance set out in the 2016 Housing SPG and the previous London Housing Design Guide.[25]

Policy D6: Optimising housing density

> ### Recommendations
>
> We recommend that the density matrix be restored and linked to **Policy D6**. It should be refined by adding a further dimension that addresses access to services and local infrastructure, along the lines of the TfL density report. A refined matrix would then serve its original purpose and fit more appropriately across the varied local character, accessibility and infrastructure provision found across London. Applications would therefore more likely fall within the matrix and with what communities can reasonably expect to be delivered over time.
>
> An updated **SHLAA** character map and the **London Plan Character and Context SPG** (see recommendation and justification on **Policy D2** above) should assist boroughs and communities to come to an agreed view on local development density.

4.31 The 2008 London Plan had a policy to maximise housing potential and was specific that the Mayor would refuse permission for strategic referrals that, taking into account context and potential transport capacity, under-used the potential of a site.

4.32 Policy changed in the 2011 version of the Plan with a focus on optimising housing potential. Existing London Plan policy 3.4 (Optimising housing density) seeks to ensure housing output is optimised according to different locations and recognises the inter-relationship between the local character of an area and the relative accessibility of sites.

4.33 The intention of this policy is to ensure that land is developed to the fullest amount consistent with all relevant planning objectives, and to ensure that the quality of housing output is not compromised by the need to make the most efficient use of land.

4.34 The Planning Committee supports the continued focus on 'optimising' density and would not wish to see any weakening of policy that led to inappropriate and unsustainable increases – or a return to maximising policy.

4.35 The committee is therefore concerned that the Draft London Plan removes any reference to the sustainable residential quality (density) matrix.

4.36 The Mayor's justification for removal is that the density matrix is not being followed, 50 per cent of development is above the matrix maximum for its location, 25 per cent is double the maximum and 15 per cent is below the minimum, i.e. only 35 per cent of development is within the appropriate density matrix range.[26]

4.37 The fact that final density has been delivered above the matrix in 50 per cent of schemes does not necessarily provide an adequate justification for its abandonment. The density matrix, for all its faults, provided a useful starting point for understanding the most appropriate locations for high density development in relation to accessibility and local context.

4.38 The matrix also provided a tool for the community to understand the general levels of development density they could expect in their areas over time. Scrapping the matrix removes a starting point for the community to debate the future of their neighbourhoods – which will be a vital factor in accommodating growth at higher densities that the Plan advocates.

4.39 The Planning Committee has previously recommended that the Mayor should review the London Plan's sustainable residential quality (density) matrix. An assessment should be made of the need to include capacity for supporting infrastructure alongside the current factors of transport accessibility and urban character.[27] Advances in geographic information systems e.g. webcat[28] – should allow appropriate density thresholds for any site in London.

4.40 TfL has worked with the GLA to identify additional measures that could help establish whether a location is suitable for higher density housing.[29] TfL identified a list of connectivity measures that could be used to complement PTAL. This reflects people's primary needs:

- Access to jobs within 45 min by public transport

- Access to a rail station by walking

- Access to services (represented by walk distance to a town centre)

Policy D7: Public realm

> **Recommendations**
>
> **Policy D7** should be amended to reflect the Assembly's view that the Mayor ensures that the aspirations set out in his Public London initiative are enshrined in the London Plan so that transparent, accountable and uniform guidance can be provided across London.
>
> **Policy D7 B** should be amended to read:
>
> 'Be based on an understanding of how the public realm in an area functions and creates a sense of place, during different times of the day and night, days of the week and times of the year. In particular, they should demonstrate an understanding of the types, location and relationship between public spaces in an area, identifying where there are deficits for certain activities, or barriers to movement that create severance for pedestrians and cyclists. **This should be achieved through engagement with the local community and future users in the design of the public realm.**'
>
> **Policy D7 G** should also be amended to read:
>
> 'Ensure appropriate management and maintenance arrangements are in place for the public realm **in consultation with users, including members of the local community,** which maximise public access and minimise rules governing the space to those required for its safe management in accordance with the Public London Charter'.
>
> The Mayor should remove shopping malls, sky gardens, viewing platforms, museums or station concourses from the definition of 'public realm' in **paragraph 3.7.1.**

4.41 The Committee is pleased that Policy D7 is promoting a more inclusive and better managed approach to providing public realm in London. However, we

are concerned that there is a lack of reference to community engagement in the design and management of public realm.[ix]

4.42 The Planning Committee's 2011 report *Public life in private hands: Managing London's public space* found that London's public realm needed better management. It argued that private and public spaces alike can be neglected without a comprehensive management plan agreed during the design and planning stages. It urged the Mayor to emphasise the importance of management plans in development and of ensuring access to all users. We are pleased that this is now included in Policy D7.

4.43 The report also considered the role that community involvement can play in public realm, finding that 'early community consultation on development proposals, particularly where they include open space or other public space, is vital to a successful outcome for public space management'.[30]

4.44 As the Planning Committee noted in its report, privately owned spaces are often heavily monitored by security and CCTV, have restrictive rules and can be unwelcoming to certain users. For example, it is difficult to see how an indoor shopping mall can function without imposing some restrictions against access and certain activities and users, such as walking pets. With the current definition, there is little to stop a shopping mall development from not providing any public spaces or squares. Indoor shopping malls and sky gardens are not the same as outdoor public squares and open spaces where restrictions on activities and users are minimal.

Policy D8: Tall buildings

Recommendations

The Mayor must adopt a much tougher stance on tall residential buildings and should, in revised **Policy D8:**

- Establish a 'skyline commission' to advise on the design impact of tall buildings.
- Adopt more detailed and rigorous master planning process in relation to tall buildings, especially within Opportunity Areas.
- Draw up a London Plan policy that formalises the 'clusters' policy for tall buildings.
- Undertake a review of existing protected views, with the intention of adding new viewing corridors.

[ix] This is reflected in an Assembly Motion agreed by a majority of Members on 7 September 2017 https://www.london.gov.uk/press-releases/assembly/privately-owned-public-spaces-need-new-london-plan

- Support the development of a 3D computer model of London's emerging skyline – and ensure this is made freely available to boroughs to ensure a consistent approach.
- Adopt a requirement for all developers with proposals for tall buildings to consider other building configurations — specifically that "alternative methods of achieving the same goals and densities should be demonstrated, shown and considered, as a prior condition" so that tall buildings are not immediately seen as the answer.

Policy D8 should be further amended:

Clause D8-C.1 Visual impacts. Add sub-clause at I, or ideally after D8 C2): Appropriate long term mechanisms must be established and demonstrated to ensure that tall buildings will be well-maintained and regularly upgraded for the duration of their design life as well as when they reach the end of their design life.

Clause D8-C.3 Environmental impact. Add sub-clause: Buildings should not have a larger whole life carbon balance, per useable square metre, than a lower building would have.

Clause D8-C.3 Environmental impact
Note: The assessment of these and the minimum standards are not well defined. For example, requiring wind 'assessments' does not consider wind chill factors of as much as 6°C or local gusting.

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

4.45 The Planning Committee, and Assembly, have consistently recommended that Mayoral planning policy is strengthened to restrict the location of London's tall buildings and improve their design. As such, we welcome the improvements in this area as set out in proposed Policy D8, for example those that require local definitions of what 'tall' means and the locations in each borough in which tall buildings would be acceptable. But the Assembly wishes to see the Mayor go further.

4.46 As New London Architecture has noted, in total, 455 tall buildings are currently in the pipeline with the potential to deliver an estimated 100,000 new homes, up from 436 in 2015.[31]

4.47 The committee notes the ongoing impact of these tall buildings on the skyline, that also affect London's heritage through the cumulative impact of inappropriate development. For example, UNESCO has issued warnings about

the threat to Westminster's World Heritage status. Questions remain as to the sustainability of tall buildings, particularly in relation to their residential, as opposed to commercial, use.[32] The first London Plan policy on tall buildings[33] was never intended to apply to residential buildings and so the Mayor needs to take the opportunity of this full review of the Plan to ensure policy on tall buildings works for the community through much stronger guidance.

4.48   In its January 2016 report *Up or Out: A false choice. Options for London's growth* the Planning Committee highlighted that London is seeing an explosion of tall buildings. Tall residential buildings are not an answer to London's real housing needs and as such should not be encouraged outside of a few designated and carefully managed areas of London.

4.49   High densities can be achieved by approaches that are more suitable for families, more in keeping with London's traditional form and less intrusive on the skyline.[x]

4.50   The Assembly is therefore unanimous in call for the Mayor to get a tighter grip on the issue through tougher planning policy and better control of design approaches.[34]

4.51   An improved consultation process should be set up to provide residents, Londoners or statutory consultees the opportunity to block, or amend, inappropriate development applications. Tall buildings must face more thorough and meaningful assessments by independent commissions than smaller developments, particularly in relation to preserving the intrinsic character of historic London.

4.52   All proposals for tall buildings must be subject to independent peer Design Review Panels at several key stages of planning and design, including at pre-application stage, in order to evaluate the quality of proposals, and assess their strengths and weaknesses. Developers of tall buildings must prove to the Design Review Panels that they have previously considered alternative low or mid-rise massing configurations (alternative configurations) that do not have negative impacts on the skyline and streetscape, and that their buildings meet exemplary standards of architectural quality, materials and sustainability.

4.53   When considering building tall or large scale developments, the use of a 3D virtual reality (VR) model must become a compulsory tool used by applicants, boroughs and the Mayor's office to realistically assess the cumulative and individual impact of the development on the city in terms of views, environmental harm (including daylight and sunlight, shadowing, overlooking

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[x] For example, see Chapter 4, Up or Out: A false choice. Options for London's growth, Planning Committee, January 2016 https://www.london.gov.uk/about-us/london-assembly/london-assembly-publications/or-out-false-choice-options-londons-growth

and to microclimate) and impact on amenities. Such a 3D VR tool must be made available by the Mayor to the boroughs.

4.54 Stronger tests ensuring the highest standards of extra longevity and sustainability must be introduced to vet all tall building proposals, as these are often less sustainable than buildings of lower height and create adverse microclimates at ground level. Applications must analyse environmental impacts using dynamic models to understand, for example, overheating, vertical sky views, daylight and sunlight/shadow impacts, energy demands. A post- occupancy evaluation must also be made a compulsory requirement.

Policy D11: Fire safety

4.55 Navin Shah AM is currently leading a review on behalf of the London Assembly Planning Committee into the feasibility of requiring automatic fire suppression systems (AFSS), such as sprinklers, in London's residential buildings. As the review focusses on fire safety, the final report of the review will include comments on Policy D11 Fire safety.

Policy D12: Agent of change

4.56 The London Assembly Regeneration Committee report *Creative tensions: Optimising the benefits of culture through regeneration* recommended that the Mayor include the Agent of Change principle in the new London Plan. We are therefore pleased that it has been included in Policy D12 in the draft London Plan.

> **Recommendations**
>
> However, we would like to see provision made in **Policy D12 part B** for boroughs to consult with local cultural venues on the best approach to managing the sensitivity of new development to noise or other issues.
>
> **Policy D12 D** should be revised to include the word 'dust' as well as established 'noise generating' uses.

4.57 The report recommended that local authorities should consult with the list of identified venues before assessing the likely impact of new planning applications on these venues. For example, London Councils refers to art and culture taking place in community venues and wants such informal culture to also be considered during regeneration.[35]

4.58 Without this consultation, it is unclear whether and how boroughs will work with cultural venues to identify the right provision of soundproofing and/or other protections in noise-sensitive development. Such an approach could also miss ancillary or temporary uses, or smaller and informal venues, which may also be noise-generating.

4.59 This policy is linked to Policy HC7 Protecting public houses. This policy should also include provision for consulting with public houses to identify any special mitigation in nearby development proposals.

4.60 The Planning Committee further suggests that Policy D12 D should be revised to include the word 'dust' as well as established 'noise generating' uses. This would ensure greater protection for established industrial uses particularly as the Draft Plan suggests there should be a move towards co-location of industrial and residential uses.[36]

5. Housing

5.1   The Assembly has already addressed some of the Plan's content in the Housing Committee's response to the Mayor's Draft Housing Strategy, sent in January 2018. Some of the points from that response are reprised or built on below.

5.2   The Housing Committee would like to highlight strong concern over whether the right balance has been struck between London-wide strategic prescription and delegation to the boroughs. The Assembly supports empowering the boroughs to make local decisions where appropriate and where they are properly equipped to do so. However, the boroughs also need the Mayor's support in setting pan-London standards, especially when resources are stretched. For example, the Mayor has chosen to establish a London-wide 35 per cent benchmark for affordable housing within market schemes, which has now been extended to different types of development, such as build to rent and student accommodation. The rationale for this is, in part, to bring consistency, and support the boroughs to resist pressure in their negotiations with developers. However, the Mayor has left for determination by the boroughs other areas of considerable strategic importance, such as the preferred tenures for affordable housing for a substantial proportion of new development and the size mix of schemes, where they will doubtless come under equally significant pressure.

Policy H1: Increasing housing supply

5.3   The Assembly acknowledges the ambition of the much-increased delivery targets for housing London-wide and we agree that London needs to see a step-change in the volume of additional homes delivered if we are to house our growing population adequately. However, as noted in the Housing Committee's response to the Mayor's Draft Housing Strategy, we are concerned about the capacity to supply, for ten years, some two thirds as many new homes again as we delivered last year.[xi]

Recommendations

The Assembly would encourage the Mayor to work with London Councils and other relevant parties to promote peer-support and capacity-building activities among the boroughs, to ensure good practice is shared by those boroughs who have recent experience of significant development, including infill. The Mayor will also need to work closely with the boroughs to identify funding for, and support them in developing, the infrastructure (including social infrastructure, such as schools and GP surgeries) which underpins the success of new housing development.

[xi] In 2016-17, London supplied 39,560 net additional homes. This was already a 30 per cent increase over the previous year, when 30,390 homes were supplied. Source: Live Table 122, Ministry for Housing, Communities and Local Government

5.4 Savills' recent analysis of the market and industry estimates that actual London delivery is expected to peak at around 46,000 units in 2017 before tailing off over the next few years to an estimated 35,000 units in 2021.[37]

5.5 The challenge to improve on this is particularly acute for the outer London boroughs (whose net completions targets have doubled in this new Plan), and especially over the short-term, as change on this scale does not happen overnight. Many boroughs are likely to need substantial support to ensure they can deliver, but it is not clear that the Mayor has the capacity to provide this support through the GLA. Those boroughs who have been the most active developers in recent years may have knowledge to share on how best to approach this significant challenge. The Housing Committee heard in January 2018 from Havering about how vital securing infrastructure will be to unlock housing development. They told us, for example, that new residents in Romford cannot get their children into primary schools, and that north-south transport connectivity in the borough is very poor. Only with the right infrastructure in place at the right time, will development on this scale be acceptable to local communities, but this is a long-term endeavour.

5.6 Without the right support, many boroughs may struggle to deliver on the housing targets the Plan has set, in terms of their own capacity, of attracting and funding infrastructure, and of securing local support.

Offsite manufactured housing (OSM)

> **Recommendations**
>
> The supporting text in the Housing chapter, and elsewhere, needs to make reference to the role that offsite manufactured housing can play in increasing London's housing supply.
>
> For example, **paragraph 4.1.4** could be explicit in the role this kind of housing can contribute.
>
> There should be a new policy drafted that refers specifically to the role of offsite manufactured housing in accelerating London's housing supply that is cross-referenced to **Policy GG4**.

5.7 The London Plan needs to acknowledge the role that offsite manufactured housing (OSM)[xii] can play in increasing London's housing supply.[38] London needs 65,000 new homes per year to meet its growing needs. Despite recent improvements in housing output, traditional housebuilders and developers

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[xii] Offsite manufactured housing is an umbrella term for a system of house building that relies on individual components being 'manufactured' in a factory, transported to a site and mostly, or entirely, completed and assembled on location.

continue to deliver between 50 and 60 per cent of what the Mayor wants for London.

5.8   In the short to medium term London's construction industry is facing ever stronger challenges to deliver increased supply through potential labour shortages and rising costs of materials.

5.9   There are now some very encouraging signs that a more positive future for housebuilding in London is emerging in the form of the potential of offsite manufactured housing. The Government continues to stimulate the growth of this sector through a variety of policy and funding programmes.

Policy H2: Small sites

Recommendations

The Assembly's biggest concern with this policy is uncertainty over how it will work on the ground. For many boroughs this represents a big change over a short space of time. It is not clear that there is enough support for the boroughs, or sufficient capacity in the industry, to deliver on very challenging targets.

Policy H2 D2 should add a new element to exempt low-cost business premises and light industry from the presumption in favour of development.

The Planning Committee suggests **Policy H2 E** is amended to reflect unacceptable harm created by the loss of small areas of open space used as play or community leisure space.

Policy H2 D and E should be amended to reflect that offsite manufactured housing, or precision manufactured housing, is particularly suitable for use in small or constrained sites.

Special attention will be required within conservation areas to ensure that increased housing provision is accommodated in a way that also complements and enhances an area, taking into account conservation area character appraisals and management plans.

Policy H2 E and F should be amended to remove the presumption in favour of development in small sites in conservation areas. See also reference in Policy E4 in relation to non-designated industrial sites.

New Policy H2 E1 Ensure that increased housing provision in conservation areas is accommodated in a way that also complements and enhances an area, taking into account conservation area character appraisals and management plans.

5.10 In January 2018, the Housing Committee heard that intensification on small sites will be a hard sell for planners and councillors in some boroughs; this is especially true for outer London, where two thirds (68 per cent) of the planned small sites development is targeted. Local people are accustomed to a different kind of development model and have different expectations. They deserve clear and thorough explanations as to what this new focus will look like for them and how any negative implications (increased demand for services and social infrastructure development, changed local character and feel, loss of green space) will be managed or mitigated. Havering emphasised the protection of place and design, in stark contrast with the Draft Plan which specifically moves the emphasis from "preserving what is there at the moment towards encouraging and facilitating the delivery of well-designed additional housing to meet London's needs."[xiii] People will need to have input at design code stage to ensure local codes suit local needs, though it may be difficult to gain agreement for this.

5.11 In January 2018, we also heard from Tower Hamlets about the additional burden of managing many small sites, compared with a few larger ones, and the burdens that this places on planning authorities, as they are much more difficult to plan for. The presumption in favour of development where schemes conform with a local design code may help with this. However, unless boroughs develop design codes at local level, which itself may require significant resource, their ability to refuse permission on small sites will be limited, so getting this process right will be important.

5.12 There is also concern over the capacity of the industry to ramp up production to these levels. Smaller builders have been in significant decline over the last few decades.[39] Yet it is these same businesses who are often best suited to delivering homes on smaller sites. Whether they are able to deliver on such challenging targets (and if so, at what cost to commissioners) is questionable, especially given the Mayor's active encouragement of cash in lieu of affordable housing contributions on sites of under ten homes. An example that Croydon Council has developed involved a package of 80 separate sites, a process the council managed themselves, due in part to the complex community engagement requirements. We wonder whether smaller house builders, Housing Associations and others will have the capacity to take all stakeholders through such complex processes in ever denser inner London, with smaller batches of sites or single sites.

5.13 There are multiple risks associated with this policy around the boroughs' and smaller builders' ability to deliver, yet more than one third (38 per cent) of an already testing housebuilding target is reliant upon them doing so. It is

[xiii] GLA, Draft London Plan 2017, December 2017 para 4.2.5

important that sufficient support and appropriate incentives are in place to stimulate the development we need.

5.14 The Planning Committee understands the Mayor's intention that small sites will significantly increase the supply of housing in London. Small sites are defined as developments of 25 units or below on sites with an area of 0.25 hectares or below.

5.15 However, the Planning Committee has a number of concerns about the potential impact of this policy:

- **H2 D2** applies a presumption in favour of development on small sites through conversions and demolition – which may work against the policy objective of retaining family sized housing in London.

- **H2 E** provides for refusing development that otherwise has presumption in favour, where it gives rise to unacceptable harm in terms of residential privacy, designated heritage assets, biodiversity or a safeguarded use.

5.16 The Planning Committee has concerns that such development will lead to the unacceptable loss of non-designated green space and gardens (running against the objectives of **Policy G4** that aims to aim to protect and enhance small open spaces including gardens). The Committee therefore recommends that **Policy H2 E** is amended to reflect unacceptable harm created by the loss of small areas of open space used as play or community leisure space in addition to those instances in the draft policy.

5.17 Low cost business and industrial premises are at a premium in London and already under threat from speculation and permitted development rights. They are very important to London's local economy, jobs and the mixed-use nature of its high streets and town centres.

5.18 We accept that small sites should play their part in conservation areas, however, a) not if they are 'harmful'; and, b) this must not be at the expense of London's character. That is why an area design code is required.

Offsite manufactured housing (OSM) and small sites

5.19 Small and 'infill' sites abound in London, but are normally surrounded by existing homes. OSM has much lower construction impacts in terms of noise, vehicle movements and faster build times. All of these advantages make OSM particularly suitable for the capital, particularly in terms of increasing densities on existing housing estates.

5.20 In terms of infill sites, the potential opportunities can be considerable. Barnet Council, for example, indicated that up to 1,000 homes could be delivered on infill sites across its borough. In Brent over 1,100 empty garages could be

suitable for conversion to new homes. Boroughs such as Harrow, Greenwich and Lambeth have all either delivered or identified capacity for over 150 homes on infill sites.

5.21 Less disruption to residents will make acceptance of infill development and estate intensification considerably more acceptable. London has capacity for at least 100,000 homes on infill sites, and many of these are currently unviable for development through conventional means.[40]

5.22 The Planning Committee therefore recommends **Policy H2 D** and **E** should be amended to reflect that offsite manufactured housing, or precision manufactured housing, is particularly suitable for use in small or constrained sites.

Suggested changes – Table 4.3- 2017 SHMA findings

Recommendations – Table 4.3- 2017 SHMA findings

The findings of the SHMA as outlined in **Table 4.3** needs to be reassessed, by the next Alterations to the Plan, 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.

5.23 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 per cent to 30 per cent)."[41]

5.24 While we understand that population projection is a complex science, however, the fact that this projection has almost halve over two surveys seems to indicate that there is significant uncertainty in the data.

5.25 The SHMA acknowledges that Brexit is likely to cause changes to the economy and migration flows – thus impacting housing need. We don't know what these changes will look like yet but the SHMA data will need reassessing in light of them.

5.26 The plan measures over-crowding via the English Housing Survey (EHS) by the bedroom standard. The bedroom standard is pretty good but it doesn't take into account space. We would like the Mayor to begin to measure bed-space in London and to use this as a measure of over-crowding.

5.27 Concealed households are also measured in the SHMA by the EHS. It is argued that the value of using the EHS is that it not only tells you who is concealed but what their needs are. However, there seems to be a flaw in the data as it reports that there are no concealed families in need of 3 or 4 bed housing. We know from the 2011 UK Census that there are roughly 68,000 concealed

families in London.[42] Meanwhile, there appears to be excessive reliance on the apparent 'need' (as expressed in survey responses to the EHS) for adult children to move into one-bedroom low-cost rented units, without consideration of alternative options. This data must be reassessed.

Policy H4: Meanwhile use

Recommendations

Policy H4 should be amended to explicitly refer to the suitability of offsite manufactured housing for meanwhile use of sites for housing.

Paragraph 4.4.2 should be amended to strengthen the encouragement of offsite manufactured housing for meanwhile uses. The Mayor needs to provide a clear and strong leadership role in the development of awareness of the sector's potential.

5.28 There are many potential housing sites in London that are not delivering the new homes the capital requires. Often these sites are temporarily 'stalled' through funding problems, or have been earmarked for development as part of a wider regeneration strategy that is phased over many years. OSM enables these sites to be used almost immediately.[43]

5.29 The Planning Committee recommends that Policy H4 should be amended to explicitly refer to the suitability of offsite manufactured housing for meanwhile use of sites for housing.

Policy H7: Affordable housing tenure

Recommendations

The definition of what is affordable in the London Plan needs to be tightened, to ensure there is no ambiguity.

Without reducing the flexibility of the policy text and more clearly setting out affordability and tenure mixes there, boroughs may find themselves heavily pressured into accepting proposals with affordable housing that falls outside the Mayor's preferred tenures, especially where they face extremely challenging development numbers. A clear definition of affordable would obviate this problem.

5.30 The Mayor does not consider 80 per cent of market rent affordable.[44] However, the definition in the Plan glossary mirrors that in the National Planning Policy Framework, including rents at up to 80 per cent of market level (while also setting out the Mayor's *preferred* affordable tenures). Policy H7 of the draft plan deals with affordable housing tenure, and says it will be

for the boroughs to agree the tenure of 40 per cent of affordable homes arising through s106 agreements based on need and "provided they are consistent with the definition of affordable housing". The supporting text in section 4.7.2 indicates a *presumption* that this 40 per cent will focus on social rent or the new London Affordable Rent. But it goes on to offer more flexibility, leaving it open for schemes to be proposed with a large proportion of 'affordable' homes at up to 80 per cent of market rent levels. The Housing Committee's January 2018 meeting heard from Havering that developers "default to the London Plan" to get what they want, using it to trump local decision-makers.

Policy H10: Redevelopment of existing housing and estate regeneration

Recommendations

This policy is welcome but the Assembly would like to see it made clearer or more explicit in places. The policy requires that proposals where there is a loss of existing housing should always reprovide the same amount of housing (defined in terms of floorspace) and in section B the same requirement is applied to existing affordable housing. This asks for replacements to be of equivalent or better quality. Section C applies to 'estate regeneration schemes' and asks here for equivalent tenures to be provided.

The Deputy Mayor clarified in our meeting in January 2018 that there is no lower limit to the requirement that the viability tested route will apply, where there is any loss of affordable housing. We feel that this could be made clearer in the wording of the policy.

Part B does not include the requirement to replace affordable housing at equivalent tenures, and leaves open the definition of affordable, as mentioned in our response to **policy H7**. Alongside this, part C does not provide a definition of 'estate.' We are concerned that without a clear definition of an 'estate' this has the potential for schemes that remove reasonably large numbers of social rented homes to argue that only part B applies, and thus require less affordable tenures in replacements. The policy should be clearer that parts B and C apply wherever any redevelopment of existing affordable housing is proposed.

Policy H12: Housing size mix

Recommendations – Larger homes and overcrowding

The Plan needs to set targets for the development of larger homes and to alleviate overcrowding. The Mayor and London Councils should agree a

common method for measuring overcrowding London-wide, enabling more accurate and more readily comparable data collection. The wording in **paragraph 4.12.3** needs further work to clarify that the Mayor is not condoning the overcrowding of families into unsuitable two-bed homes.

The Planning Committee also recommend that:

H12 A1 should give equal weight to the SHMA and local assessment of needs

H12 D1 should give priority to evidence of local housing needs which should include evidence of over-crowding and under-occupying, and the strategic requirement for affordable family accommodation

5.31   The Strategic Housing Market Assessment (SHMA) projecting housing need is based substantially on the limited data available through the English Housing Survey, along with demographic projections. It indicates that most (55 per cent) of the homes needed in London over the coming 25 years are one-bed homes. Although the Assembly acknowledges that the SHMA is evidence, not policy, it is included in the plan as supporting text for policy H7. Boroughs "should have regard" to it "and, where relevant, local assessments" [xiv] when making decisions on the size mix of new developments. The way this policy is written indicates clearly the primacy of the London SHMA, so boroughs would need to be confident in the robustness and currency of their local assessment to counter development proposals favouring one- and two-bed homes. Indeed, David Montague, the Chief Executive of L&Q, told the Housing Committee in December 2017 that three quarters of L&Q's 3000 currently planned London homes are one- and two-bed properties.[xv] Yet, for example, the Housing Committee heard in January 2018 from Havering that 80 per cent of their assessed need last year was for homes of three beds or more. Tower Hamlets also told the Housing Committee in January 2018 that it would like to require developers to build family homes, both market and social.

5.32   The Outer London Commission in 2016 found 730,000 London homes which currently have two or more bedrooms were under-occupied.[45] The Assembly appreciates that we need to provide attractive options for people interested in downsizing in order to incentivise more efficient use of our stock. In our experience, older downsizers are often looking for at least two-bed, rather than one-bed homes (although we recognise that smaller homes can be attractive too as they are cheaper to rent, heat and so on).

[xiv] Policy H12A1
[xv] 72 per cent of the 3,136 homes identified on schemes funded through the Mayor's Affordable Housing Programme 2016-21

5.33 While acknowledging the advantages of a fixed grant rate to support affordable home-building, the Assembly notes that the Mayor's fixed rate of £60k for a unit at social rent, irrespective of size, means that the odds are stacked against building larger homes (which cost more to develop).

5.34 The Assembly is concerned that, via the range of incentives and mechanisms above, the large stock of homes proposed in the Draft Plan may end up being too inflexible to accommodate the inevitable fluctuations which will occur in the needs of London's population over the 25-year period it covers. Setting targets for larger homes would help support boroughs in ensuring an appropriate and sustainable size mix for new development.

5.35 The Planning Committee notes that boroughs know their local needs best. While the SHMA provides an evidence base – it is not without its flaws (as argued above) – 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. This strategic requirement, as previously discussed, will now be found in the housing strategy.

> ### Recommendations – meeting identified local needs
>
> We question the apparent inconsistency between **H12 A1**, where decision makers should have regard to the range of housing need and demand identified by the London Strategic Housing Market Assessment; and H12C which indicates that boroughs should not set prescriptive dwelling size mix requirements (in terms of number of bedrooms) for market and intermediate homes. The **2017 SMHA** set out at Table 4.3 indicates that 15 per cent of requirement is for housing with more than 3 bedrooms and 14 per cent with more than 4 bedrooms.
>
> **Policy H12D** sets out a more detailed consideration of criteria to assess whether affordable housing meets identified local needs. We suggest that this level of consideration should also be made for market and intermediate homes.

5.36 Housing is a key factor in health inequalities. The Health Committee is particularly concerned about the effects of living in overcrowded housing. Living in overcrowded conditions has a number of potential negative impacts on both physical and mental health and wellbeing, not least implications for child health and development. In its recent investigation into healthy early years the Health Committee heard that living in overcrowded conditions could have a 'devastating' impact on the health and development of young children.

> "It is devastating in for the families and in terms of child development. I have been in many homes where they could not put the baby on the floor because there is nowhere to put the baby, so that has an impact

in terms of the baby's physical development…I have been in homes where they do not have room to put a cot up, so the baby goes into bed sharing, and that puts the baby at risk of cot death… when you sit there and parents tell you about rats that run out while they are looking after their children, it is really quite shocking".[46]

Policy H14: Supported and specialised accommodation

Recommendations

We support the requirement for boroughs to undertake assessments of the short and long-term needs for supported and specialised accommodation. We suggest two additional categories be included within this policy:

- Accommodation for people being treated for communicable diseases, notably tuberculosis.
- Accommodation for people recently released from prison

Tuberculosis

5.37 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.

5.38 The Mayor has committed to action on tuberculosis in the Health Inequalities Strategy. During its investigation into tuberculosis in London, the Health Committee heard that improving access to good quality housing was one of the single most useful things the Mayor could do to contribute to better TB outcomes for London. The benefits extend not only to the health of the individuals concerned, but more widely to the health of the city as a whole, by:

- making it easier for people to manage and complete a complex treatment regime, therefore reducing the wider risk of drug-resistant strains emerging.

- lowering the high costs to the NHS of admitting patients to hospital because they have nowhere else to go.

- reducing onward transmission of cases between people who live in overcrowded conditions.

5.39 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.

Prison release

5.40 Having stable accommodation is vital to both good mental health and to preventing reoffending. But many people leave prison without it: the Centre for Social Justice reported in 2010 that up to a third of people left prison with "nowhere to go", and the Health Committee's recent investigation into mental health and offenders saw little evidence that his has substantially improved.

5.41 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 H16: Gypsy and Traveller accommodation

Recommendations

The Assembly would like to see the policy include encouragement for boroughs to provide a single point of contact for Gypsies and Travellers. Provision of a single point of contact would facilitate dialogue between the Gypsy and Traveller community and the boroughs.

5.42 The Housing Committee carried out an investigation into Gypsy and Traveller site provision in London in 2014/15, where we heard that Gypsy and Traveller residents in those boroughs who had a single point of contact felt much more engaged.

Policy H17: Purpose-built student accommodation (PBSA)

Recommendations

The Assembly welcomes the encouragement in this policy, as we advocated in 2015, for new student accommodation focused on locations outside of central London. This is often more affordable, offering a greater range of price points to students. We have previously suggested that PBSA

developments should require an affordable element, so we cautiously accept the inclusion of PBSA in the threshold approach. We would also like to see in the supporting text the need for a diversification of room types on offer to students, including non-en-suite rooms or shared rooms, which are generally cheaper to rent.

5.43   In 2015 the Housing Committee met to examine the issue of providing PBSA in London. We heard from a range of experts, including students, and visited a variety of different types of student accommodation. The committee heard concerns from universities and students' unions about the impact that rising rents are having on students from middle-income backgrounds and students with siblings, as well as the increasing lack of affordability of student accommodation. A large percentage of new rooms were en-suite (over half in 2012/13) meaning that rents for these rooms were high.

5.44   Including affordable accommodation is likely to lead to increased costs for developers or reductions in quality of accommodation, particularly in inner London. This requirement should encourage wider dispersal of PBSA to outer London. However, we would suggest that this decision is kept under review, in case it detrimentally affects the provision of student accommodation in London as a whole.

6. Social infrastructure

Policy S1: Developing London's social infrastructure

Recommendations	
Policy S1	Should be strengthened with reference to policy GG1.
	Should be cross referenced with policies D2 and D6 – development should only be permitted where there has been an assessment that the range of supporting social infrastructure is adequate for the planned increase in density.
	Paragraph 5.1.1, that sets out the range of services and facilities that constitute 'social infrastructure' should be expanded to cover 'community infrastructure' such as meeting places, community centres and halls. These too contribute towards a good quality of life.
Policy S1 F1	Should reference 'an assessment that re-provision of social infrastructure is realistic and has a source of agreed funding in place prior to development'

6.1 We understand the concept of 'Good Growth' to mean growth that is socially and economically inclusive and environmentally sustainable and it is the Mayor's intention that these core policies should be taken into account for all planning and development in London.

6.2 Underlying policy GG1 is that new development should only take place where there is access to the full range of supporting social infrastructure.

6.3 Previously, the Planning Committee has identified that, to be sustainable, new homes and other development must be supported by a range of infrastructure. The current London Plan details these examples, such as health provision, nurseries, schools, play and recreation space.   The Infrastructure Plan suggests London may need: more than 600 new schools and colleges; workspace for another 1.4 million jobs; around 50 per cent greater capacity on the public transport system and local energy production to cope with a 20 per cent surge in energy demand; and community infrastructure such as open space, community and cultural facilities, and healthcare centres.

6.4 These facilities require land, and suitable sites, in close proximity to new homes. However, there is evidence that the increased housing targets are

putting pressure on some boroughs to make stark choices in prioritising infrastructure where sites are limited.[47]

> ## Recommendations – health equity impact assessments
>
> **Policy S1 F2** should be amended to read 'Development proposals that would result in a loss of social infrastructure in an area of defined need should be refused unless [...] the loss is **a) part of** a wider public service transformation plan which requires investment in modern, fit for purpose infrastructure and facilities in order to meet future population needs or to sustain and improve services **and b) a full health equity impact assessment for the local population has been conducted'**

6.5   The Health Committee is concerned that the Plan appears to allow for considerable intensification of development without identifying a mechanism for ensuring that adequate social infrastructure is in place or will be provided in a timely fashion. Access to social infrastructure is a key factor in health inequalities. We would welcome firmer commitments that development will not be permitted unless an accompanying needs assessment for social infrastructure has been undertaken and specific maximum timescales are in place for the delivery of the required infrastructure. This principle of timeliness should also be set out in relation to policy S2.

6.6   In particular, the Health Committee would welcome clarification on S1F2. As worded, we are concerned that the policy does not provide sufficient challenge to any loss of social infrastructure arising from sub-regional NHS Sustainability and Transformation Plans and associated reconfiguration. We are concerned that this could give rise to scenarios in which opposition to the loss of locally-valued social infrastructure is deemed to be mitigated by alternative provision elsewhere within the sub-regional STP footprint.

6.7   We suggest amended wording to strengthen the requirement to demonstrate mitigation of negative impact on health inequalities. This is in line with the Mayor's commitment to withhold support from STP plans unless they can demonstrate that **"**The impact of any proposed changes to health services in London must not widen health inequalities".[48]

Policy S2: Health and Social care facilities

6.8   We are strongly committed to ensuring that all possible steps are taken to ensure equitable access to health and care services, which is a key consideration in reducing health inequalities in London.

> **Recommendations**
>
> We agree with the supporting narrative set out at **5.2.7** with a minor wording change; that "boroughs have a key role to play in ensuring that the need for health and social care facilities is assessed, that sufficient and appropriately-located sites are allocated for such facilities, and that mechanisms are in place to secure their timely provision."

6.9   The Health Committee wishes to avoid scenarios in which residential development is permitted without clarifying the maximum permitted timescale for securing the necessary accompanying health and care infrastructure. **See our response to Policy S1 above.**

Policy S3: Education and childcare facilities

> **Recommendations**
>
> The Education Panel recommends that **Policy S3 A2** be amended to include reference to special schools. The policy should read:
>
> 'identify sites for future provision*, including for special schools*, through the Local Plan process, particularly in areas with significant planned growth and/or need'.

Other comments

6.10   The Health Committee strongly supports this policy.

Policy S4: Play and informal recreation

> **Recommendations**
>
> **Policy S4 B3** should make reference not just to accessible routes to play provision, but strongly recommend that this play provision has:[49]
> - Direct access to car-free shared space, preferably from the front door, that it is overlooked
> - Play space with clear sightlines which avoids single aspect housing
> - Doorstep play at every level of housing
>
> Policy S4, and the supporting text, needs to recognise the important role that non-designated play space (as opposed to formal space) plays in a city that is projected to grow denser.

6.11 The Planning Committee has heard that "unlike newts or bats we have no protection for children's play environment under the planning system."[50] The Plan needs to recognise that non-designated, or informal play space, needs to be protected and included in the requirement for a borough audit of play space.

6.12 This is likely to become more important as the presumption in favour of developing small sites could mean that children lose very valuable scraps of land for play and when boroughs do their needs assessment, this should be addressed in policy (see also comments on H2 above).

Policy S5: Sports and recreation facilities

Recommendations

Policy S5 Sports and recreation facilities should include a new policy that states that new stadiums should ensure that:

- new housing developed as part of, or around, a new stadium, is of mixed tenure, to include affordable housing and housing of three bedrooms or more (see Policy H1 Increasing Housing Supply, Policy H5 Delivering affordable housing, Policy H7 Affordable housing tenure, and Policy H12 Housing size mix).
- they have engaged with a diverse range of local community and stakeholder groups to:
  - identify effective uses of the stadium scheme as a community asset
  - communicate what social infrastructure will be provided
  - establish an ongoing relationship with the community
- where a stadium is financed or part-financed with public funds, stadium proposals should establish a community forum involving members of the public and stakeholders from the local community.

The Planning Committee recommends **Policy S5 4** is amended to read 'unless it can be demonstrated that there is no ongoing or future demand which has been established on a cross-borough or sub-regional level'.

6.13 The Regeneration Committee made the case for a Stadium Charter in its March 2015 report *The Regeneration Game: Stadium-led regeneration*.[51] The Charter called the Mayor to commit to:

- a clear vision and policies for place-making around the new (or expanded) stadium, including public transport connectivity and permeability between the stadium and surrounding area.

- undertake a skills mapping exercise to assess local capacity to take advantage of new jobs. The results should inform a skills and employment strategy, including measures to prepare and upskill local communities in order that they can access the new jobs.

- pay the London Living Wage to all stadium employees.

- support the Mayor's housing targets in all stadium-led regeneration schemes, where practical. Any new housing developed as part of, or around, a new stadium, should aim to be mixed tenure, to include both family and social rented affordable housing.

- demonstrate how they have consulted with a diverse range of local community and stakeholder groups to:

- identify effective uses of the stadium scheme as a community asset

- communicate what social infrastructure will be provided

- establish an ongoing relationship with the community.

6.14 In addition, in cases of a stadium financed or part-financed with public funds, the Mayor should: require a community forum to be set up to involve the public and communities in a stadium before the new venue is built. This would give communities a say on how the stadium is used, and what social infrastructure is provided.

6.15 With the ongoing issues facing the operation of the London Stadium and the redevelopment or proposed redevelopment of stadiums such as Stamford Bridge and Loftus Road it is timely and appropriate to introduce a more rigorous approach to stadiums in the draft London Plan. Since stadium planning applications are typically referred to the Mayor, it is appropriate that there is clear policy in the London Plan on this matter.[52]

6.16 Policy S5 Sports and recreation facilities is the only place where stadiums are mentioned in the Plan. This policy is clearly aligned towards the provision of smaller facilities and makes no differentiation between larger developments such as stadiums and smaller developments, such as playing fields. Stadiums place significantly higher demands on local communities and bring with them opportunities for regeneration and new development that require careful consideration.

6.17 The Planning Committee also considers **Policy S5** inadequate in protecting London's playing fields. The London Playing Fields Foundation has noted the progressive loss of playing fields in the capital, for example: 40 per cent of London's cricket pitches over the past 20 years.[53]

6.18 It cites two main reasons why so many sites are vulnerable:

- Playing fields are loss-making operations and it is difficult to justify their ongoing maintenance, modernisation and management from an economic point of view.

- The pressure to deliver more homes means selling off a playing field can provide local authorities (who own 85 per cent of London's playing fields) with the triple benefit of realising a significant capital receipt, meeting Government housing targets and removing a huge recurring maintenance obligation.

6.19 The Draft Plan notes that sport and recreation facilities are important components of social infrastructure as they encourage physical activity and deliver a range of social, health and wellbeing benefits to communities. Further, Policy S5 Sports and recreation facilities requires boroughs to regularly assess the need for sports and recreation facilities at the local and sub-regional level and secure sites for a range of sports and recreation facilities.

6.20 Some boroughs have very limited access to playing fields within their boundaries and are reliant on provision in adjacent authorities. A borough that concludes it has 'over provision' needs to make its assessment within a cross-boundary or sub-regional context – recognising that neighbouring boroughs may have insufficient provision and little prospect of securing new provision within their boundaries.

6.21 Given the projected scale of London's growth, and the role that existing playing fields play as a cross borough resource, the Planning Committee recommends **Policy S5 4** is amended to read 'unless it can be demonstrated that there is no ongoing or future demand which has been established on a cross-borough or sub-regional level'.

7. Economy

7.1 The draft London Plan should more clearly define what is meant by the terms 'low-cost business space' (Paragraph 6.2.2), 'affordable workspace' (Paragraph 6.3.1), and 'affordable business space' (Paragraph 6.3.3), the distinction, and relationship between the three.

Policy E2: Low cost business space

Suggested changes

7.2 We support the inclusion of a new policy to ensure "a sufficient supply of business space of different types and sizes…at an appropriate range of rents". The pressure on affordable workspace supply in London is increasing, exacerbated by a declining trend in industrial land stock, coupled with the relaxation of planning rules for Permitted Development Rights.[xvi]

7.3 The interests and needs of micro and small businesses, which make up the overwhelming proportion of SMEs in London, must be properly considered and reflected in this new policy. This could be achieved by including a commitment to provide specific support to these businesses, in addition to the Mayor's commitment to "encourage the delivery of new workspace for SMEs", and similarly to his commitment to specifically support artists and creative businesses.

Recommendations	
Policy E2 A	We believe there is scope for a more precise definition, or as a minimum, an indication, of how low-cost business space is defined for the purposes of the draft London Plan, and how it differs from the term 'affordable business space'.
Policy E2 B	We welcome the requirements for a loss of existing low-cost B1 business space to be justified in new development proposals, and for either an appropriate equivalent space to be 're-provided', or a suitable alternative offered, as proposed by Policy E2B.
Policy E2 C	We note the requirement in this policy for development proposals for new B1 business floorspace greater than 2,500 sqm, to consider the scope to provide a proportion of flexible workspace suitable for micro, small and medium-sized businesses. However, we believe that there is scope to provide an indication of the proportion of flexible space that should be provided in new developments.

xvi Rules for Permitted Development Rights were relaxed from May 2013 and made permanent in October 2015.

Paragraph 6.2.6	There is also scope to reflect the need for innovative use of alternative spaces to support business start-up hubs, incubator projects and co-working in paragraph 6.2.6 of the draft London Plan, and to consider incorporating this aspect into policy. We would argue that premises categorised as planning use D1would be suitable for this purpose, and could help provide greater flexibility in the type of building that can be used. [xvii]

7.4   The Economy Committee investigated access to workspace, focusing on SMEs, in 2017. The committee's findings, set out in its report *Helping SMEs to thrive,* published last November, demonstrate that the lack of affordable workspace is impeding the growth of micro and small business in the capital.[54] The Committee heard that the challenges and needs of micro-businesses differ considerably to SME businesses employing large numbers of people. This can mean that the voice of smaller business is lost in conversations to develop policy and practice.

Policy E2 B

7.5   The Economy Committee heard that the SME sector, particularly micro and small businesses, often directly impacted by local regeneration and development, may be locked out of the conversations that lead to fruition of the plans. Some can feel that they are often consulted at the end stages of the planning process, when little or no influence can be achieved.

7.6   The committee's investigation found that better alignment of local planning policy and local business early on, to minimise the displacement that can occur following new or re-development, is key to ensure that SMEs remain firmly embedded in local communities across the capital.

7.7   The Hackney Wick mixed-use development is an example of where more closely aligning planning policy and local business could have worked better. Prohibitive costs for new work spaces in Hackney Wick have left them mostly empty and unused by the local artist population for whom they were intended. The committee also heard that workspaces designed as part of the redevelopment in Elephant and Castle seemed more suited to occupancy by large corporations, with units being predominantly geared to retail rather

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[xvii] According to the Town and Country Planning (Use Classes) Order 1987 (Statutory Instrument 1987 No. 764), Class D1 premises include clinics, health centres, crèches, day nurseries, day centres, schools, art galleries (other than for sale or hire), museums, libraries, halls, places of worship, church halls, law court, and non-residential education and training centres.

than to the existing SME population, largely featuring micro and small businesses with very specific needs.

7.8   The changes suggested will help to preserve the wellbeing of smaller businesses and better recognise the contribution they bring to communities. The Mayor must embed the key principle of opportunity and economic fairness for all, as set out in his vision document 'A City for all Londoners'. The diverse mix of businesses, both in type and size, is particularly characteristic of the London economy. The SME sector covers a broad spectrum of businesses, and the voice of smaller business is often lost in conversations to develop policy and practice.

Policy E2 C

7.9   The market for flexible workspace in London has grown in recent years. The Economy Committee heard how flexible or co-working models can help combat the high cost of workspace, particularly for start-ups and micro businesses. They allow for shared space and resources offered to firms on a flexible basis. Models, such as those adopted by Wimbletech Community Interest Company in the London Borough of Merton, are helping to alleviate the high premises overheads, including rent, lease and business rates costs, that these businesses would struggle to meet by themselves.

Paragraph 6.2.6

7.10   Wimbletech is one example of alternative use of space. Working with organisations such as local authorities, Wimbletech has made smarter use under-utilised libraries and public spaces into affordable co-working hubs for entrepreneurs, startups and small businesses. These spaces are accessible 24 hours daily.[xviii]

Policy E3: Affordable workspace

Recommendations – definition of affordable workspace

We note the definition of affordable workspace as set out in **paragraph 6.3.1**. We consider that it should go further, to: a) indicate a maximum rate that could be charged for affordable workspace; and b) identify young adults as a specific group needing support, in bullet point 3 of **Policy E3 A**, so that it reads "dedicated for disadvantaged groups and **young adults** starting up in any sector".

[xviii] Wimbletech transform under-utilised public spaces into affordable accessible co-working hubs for entrepreneurs, start-ups and small businesses. See https://www.coworkinglondon.com/directory/wimbletech-cic/ for more information.

7.11 Data show that young people in London aged between 18 – 24 years old are less likely to be in employment. Unemployment rates for this group are almost three percentage points higher than the UK average rate (17.1 and 14.3 per cent respectively).[55]

> ### Recommendations – live-work spaces
>
> The London Plan **Policy E3** should include a policy to provide dedicated affordable 'live-work spaces' as a form of affordable workspace. This is likely to require the addition of 'including live-work spaces' in the **Policy E3 part A paragraph 2**: "dedicated for specific sectors that have cultural value such as artists' studios and designer-maker spaces".

7.12 The Regeneration Committee's report *Creative tensions: Optimising the benefits of culture through regeneration* noted that finding affordable workspace is particularly challenging for artists. Artists are among the lowest earners, making under £10,000 per year from their work.[xix] Given this low income, the report found that artists would benefit from more live-work spaces since they often cannot afford to pay two rents.

7.13 There is a risk that without ensuring that there are sufficient affordable spaces for artists to live and work that Creative Enterprise Zones (CEZs) and cultural quarters could become unsustainable. There needs to be a long-term vision for sustainable zones where affordable workspace is created alongside the significant amounts of affordable housing London needs.

7.14 Policy HC5 does not mention the provision of affordable workspace for sectors that have cultural value in CEZs. The policy should either make specific reference to **Policy E3** in part C3, or it should include an additional paragraph that outlines how affordable live-work spaces should be encouraged in CEZs.

Policy E4 Land for industry, logistics and services

> ### Recommendations
>
> New policy requirement to be inserted between existing **E4 A and B**: Boroughs should carefully audit industrial activity and map industrial accommodation across their area, and their Development Plans should clarify the planning status of all industrial sites, refining policies maps and introducing designation where appropriate.
>
> **There should be no presumption in favour of development of non-designated industrial land on small sites.**

[xix] National median wage for artists in 2010 according to the Artist Salary Research, Design and Artists Copyright Society, quoted in Artists' Workspace Study, GLA, September 2014, p 7.

7.15 Paragraph 6.4.1 of the Draft Plan rightly acknowledges that London depends on a wide range of industrial, logistics and related uses that are essential to the functioning of its economy and for servicing the needs of its growing population, as well as contributing towards employment opportunities for Londoners.

7.16 Policy E4 A requires that a sufficient supply of land and premises in different parts of London to meet current and future demands for industrial and related functions should be maintained.

7.17 As a necessary part of the plan-making process boroughs should be encouraged to carefully audit industrial activity and map industrial accommodation across their area, and their Development Plans should clarify the planning status of all industrial sites, refining policies maps and introducing designation where appropriate.

7.18 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. This seems an anomaly and should be amended in Policy E4 C.

Policy E5 Strategic Industrial Locations

Policy E6 Locally Significant Industrial Sites

Policy E7 Intensification, co-location and substitution of land for industry, logistics and services

Comments

We believe the Mayor's approach to protecting industrial land needs reviewing in the light of increasing pressures on this land use. Strategic Industrial Land (SIL), which has the most protection under the existing London Plan, is still being lost at a faster rate than envisaged through the 'managed release' approach.

Locally significant and non-designated sites receive much weaker protection.

The Assembly would wish to seek protections for all forms of industrial land remain until a more rigorous assessment of demand, including that coming from new and emerging industrial sectors is made.

7.19 There is no definitive guidance as to what is the right amount of industrial land: as London continues to grow there are increasing pressures on all forms

of land use activity to demonstrate that they are contributing efficiently to London's needs. Industrial land in London is under particular pressure given the high demand for housing land and the much higher land values that residential development commands, compared to industrial.[56]

7.20 Current London Plan policy distinguishes between three categories of industrial employment land:

- Strategic Industrial Locations (SIL), which accounts for 50 per cent of industrial land.

- Locally Significant Industrial Sites (LSIS), which represent 14 per cent of industrial land.

- Non-designated industrial land – the remaining 36 per cent of industrial land.

7.21 In the past, land designated as SIL had received a strong measure of protection under the London Plan, but in the last five years a significant part of the land release has come from SIL. The area of industrial land in SILs fell by 7 per cent between 2010 and 2015.[57]

7.22 The 2016 Annual Performance Monitoring report highlighted this potentially concerning discrepancy, as follows:

"The rate of loss of industrial land is significantly higher than in the previous two years and is more than 2.5 times above its monitoring benchmark. This trend will be monitored particularly closely."[58]

7.23 A report for the Mayor in 2015 noted that if this trend continued, the total stock of industrial land in London will decline by 33 per cent by 2041 – exceeding the SPG land target significantly by 2031.[59]

7.24 Industrial land is vital for London's economy. Given the pressure on industrial land from competing uses, specifically housing, it is important to recognise that once land changes from industrial use it is, most likely, lost forever.

7.25 It is important to take into account that demand for industrial land will in future also come from emerging industrial sectors.

7.26 There are a number of emerging activities, or sectors, that make demands on industrial land. For example, renewable energy generation, data centres, life sciences, clean technology and low carbon activities. Such activities tend towards lower density land use and are more likely to be located in Outer London locations.[60]

7.27 The potential for industrial land to accommodate new uses is demonstrated by the Mayor's recent announcement of a feasibility study (to be undertaken

by Film London, London Local Enterprise Panel and London Borough of Barking and Dagenham) into the creation of a major new film studio on a seven-hectare industrial site in Dagenham East.[61]

7.28　Not only are new employment sectors emerging, existing sectors are using land and buildings in new ways. The Mayor's Industrial Land Demand Study notes:

> "Some activities that might be considered as traditional activities have themselves undergone dramatic change, often involving a switch from mass production to niche production. For example, printing no longer involves vats of ink and large mechanical printing presses: it is now digitised. Similarly, in the food and drinks sector: while very large manufacturers of very high volume foodstuffs have largely relocated away from London, much activity in this sector is now driven by SMEs making and selling specific and more customised products. The same dynamics hold in the clothing and furniture sectors, where 'artisan' and small-scale manufacturers are increasingly common."[62]

7.29　The study further highlights the need to frame policy in the light of these changes, their implications for new forms of accommodation and the blending of uses in mixed developments and 'hybrid' buildings.

7.30　We believe the Mayor's approach to protecting industrial land needs reviewing in the light of increasing pressures on this land use and pressures on such uses highlighted in his own industrial land evidence base.[63] SIL, which has the most protection under the existing London Plan is still being lost at a faster rate than envisaged through the 'managed release' approach. Locally significant and non-designated sites receive much weaker protection.

7.31　We would wish to seek protections for all forms of industrial land remain until a more rigorous assessment of demand, including that coming from new and emerging industrial sectors is made.

Policy E9: Retail, markets and hot food takeaways

Comments

We support **Policy E9 C** as a welcome step to tackling London's obesogenic environment. The Health Committee notes, however, that unhealthy, energy-dense food is also available from a range of other businesses and would welcome additional guidance for boroughs on how to undertake a more comprehensive assessment of this issue.

Policy E11: Skills and opportunities for all

Recommendations

Policy E11 B should be amended in section c that refers to increasing under-represented groups in the construction industry.

The specific potential of offsite manufactured homes as a source of employment for under-represented groups in construction should be made explicit.

7.32 The Planning Committee's report on offsite manufactured housing (OSM) has identified that moving production from the construction site inside to a factory environment has many other benefits, especially in attracting a new demographic to the industry and diversifying the workforce.[64]

> "The stereotypical image of the construction workplace is pretty unappealing to younger generations: hard labour, bad weather, noise and dirt, limited opportunities to broaden experience and progress […] While this might not be the reality, there is at least a grain of truth to it. So, it's hardly surprising we've got a skills issue."[65]

7.33 Being able to offer professional careers in a permanent place of work should help the industry attract a broader pool of talent - especially women and young people.

7.34 OSM housing opens up a wide range of STEM employment opportunities, specifically to groups that have not been attracted to traditional construction work, such as women, and across a whole range of skill levels, which should be more attractive to young people in a way that differs from 'traditional' house building. There is potential for demand for homes to fuel employment opportunities in the rest of the country. London's demand for homes could stimulate job growth and rebalance the national economy. This is something the Mayor may wish to discuss with Government for London to play a leading role in an emerging national industrial strategy.

8. Heritage and Culture

Policy HC1 Heritage conservation and growth

Recommendations

Policy HC1 needs to strengthen its language to reflect the importance of 'preserving' and 'enhancing' London's heritage, to better reflect the intentions set out in the 1990 Listed Buildings and Conservation Areas Act that is still the principal legislation reflecting heritage assets. An equivalent level of protection for London's heritage should be given alongside that accorded to open space in **policies G1-G4,** for example.

The Mayor should consider retaining the essential policy objectives expressed in the current London Plan policy 7.9 (Heritage led regeneration). This would be of particular assistance in achieving the intensification of suburban areas of London that the Mayor is seeking.

The Mayor needs to commit to producing a Heritage SPG. This will assist hard-pressed local authorities and bring the Plan in line with the intention set out in paragraph 126 of the NPPF.

The Plan's **glossary** (sustainable development, page 526) should reflect that the historic environment is an essential part of sustainable development and growth

8.1 Paragraph 126 of the NPPF states that local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. In doing so, they should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance.

8.2 We recommend the production of a Mayoral Heritage Strategy for London as a free-standing document. This will assist hard-pressed local authorities and bring the Plan in line with the intention set out in paragraph 126 of the NPPF.

8.3 Historical and archaeological matters should be read through to both natural environment policies and to polices covering other features, such as canals, whose historic component is an essential part of their character and importance. This is because the historic and archaeological environment is potentially very broad, including such places as ancient woodland, canals, rivers and their riparian areas, commons and parklands, and previously industrial and military sites.

8.4 The definition of sustainable development for the purposes of plan-making and decision-taking is in the NPPF (paragraph 7). This identifies three strands, economic, social and environmental, as contributing. The historic

environment is identified within the environmental dimension, and is one of the core planning principles (paragraph 17). The Plan's glossary (sustainable development, page 526) should reflect that the historic environment is an essential part of sustainable development and growth.

Policy HC5: Supporting London's culture and creative industries

Recommendations

We welcome the fact that the new London Plan Policy HC5 part A5 now requires Opportunity Areas and large-scale developments to include cultural venues and/or space for outdoor cultural events.

However, we would like to see the Plan include a more prescriptive definition of 'large-scale mixed use development' in **Policy HC5 part A5**. Alternatively, we would like to see a requirement for developments of over 100 dwellings to produce a Culture Action Plan. The policy should also include reference to protecting and enhancing cultural facilities in outer London specifically.

8.5   The London Assembly Regeneration Committee report, *Creative tensions: Optimising the benefits of culture through regeneration*, asked the Mayor to assess the value of requiring "a robust Culture Action Plan" for new developments over 100 dwellings, as is the practice of the London Borough of Wandsworth.

8.6   It is not clear what kinds of development Policy HC5 part A5 should be applied to. While major and minor developments have a planning definition, what is meant by 'large-scale mixed use developments' is open to interpretation. A clearer definition would ensure a more rigorous application of this policy.

8.7   For example, a more commonly used term is 'large-scale major development', which has a more widely accepted definition.[66] A large-scale major development is defined as a development of over 200 residential units, or over 4 hectares in size where the number of residential units is not given. For other uses a floorspace of 10,000 square metres or more or where the site is over 2 hectares in size or more, constitutes a large-scale major development.

Policy HC6: Supporting the night time economy

8.8   We welcome the inclusion of this new policy. London's night time economy (NTE is a key driver of economic and cultural activity, contributing two-fifths

to the overall value of the UK's night time economy.[xx] We therefore consider it appropriate to take a strategic approach to developing London's future NTE, and to make the requirement to support diversification intrinsic to future planning at a local level.

8.9 A strategic overview will be vital to ensure coherence across London's NTE as it develops. Stakeholders contributing to the Economy Committee's investigation into the NTE, firmly support the need for some form of overview.[67] One contributor noted "from (our) perspective, that sort of infrastructure and that sort of clarity of partnership and focus is what we push for all over the country."[68]

> ### Recommendations – Policy HC6B inclusive access and safety
>
> We believe there is scope for a more precise definition, or as a minimum, guidance on what is meant by the phrase "inclusive access". The Economy Committee's investigation found the term can cover a range of access issues: gaining physical access to a venue, if you are a wheelchair user for example; the ease with which you can access a chosen activity by public transport; the affordability of the activity; and ultimately the availability of a chosen entertainment or leisure activity.

8.10 Written evidence to the Economy Committee highlighted the challenges faced by disabled individuals on a night out.[69] NTE venues can often be inaccessible and the management of crowds outside of venues not necessarily conducive to allowing easy access for disabled people who need to pass by. The Committee's findings consider the option for developing a 'gold standard' for how venues and events are managed and run, which would involve training workers to be exemplars of good practice across the entertainment industry.

> ### Recommendations – Policy HC6B diversify the range of night-time activities
>
> London's NTE needs to diversify as it develops. The Economy Committee notes the requirement to consider the diverse ways in which this might be done, including exploring the possibility of extending the opening hours of existing daytime facilities. However, we believe that boroughs will also need to be: creative about content, welcoming of different genres of music and appeal to more Londoners. These are crucial to boosting footfall and creating a vibrant, sustainable NTE.

[xx] London's 24-hour economy, the economic value of London's 24-hour economy, London First/Ernst and Young, August 2016; The total UK night-time economy is currently estimated at £66bn

8.11 The Economy Committee visited the London Borough of Croydon in September 2017. Several examples of innovative and creative approaches to developing content were shared. One example included an Andy Warhol exhibition spread around the town centre to encourage visitors to explore the area beyond their original destination and hopefully encounter new businesses along the way. The exhibition featured tributes to Andy Warhol from a host of local contemporary artists, which were displayed at prominent locations throughout Croydon. A greater focus on the quality of content, coupled with innovative design of the complex to include an event space helped attract more, and a greater variety of visitors to Boxpark Croydon.

8.12 Also at its visit to Croydon, the committee heard the experiences of participants in the GigBuddies initiative. The initiative gives people with learning disabilities the opportunity to experience and contribute to the NTE. A further visit to Hull, UK City of Culture 2017 in October the same year, highlighted ways to involve whole communities. For example, as part of the Hull UK City of Culture 2017 'Made in Hull' celebrations, social enterprise Goodwin Development Trust is working with residents across Hull housing estates on over 60 projects to promote arts and culture. In one such project, *I Wish To Communicate With You,* residents of the Thornton Estate worked closely with an international artist to turn their homes into an awe-inspiring art installation.

> ### Recommendations – Policy HC6B protect and support evening and night-time cultural venues
>
> There is scope to require boroughs to consider a dedicated space to regularly showcase and celebrate new artists and musicians, as part of **Policy HC6**. The requirement for boroughs to provide at least one dedicated "anchor venue" music performance space could usefully be incorporated in the Mayor's Supplementary Planning Guidance for Culture and the Night-Time Economy, published in November 2017.[xxi]

8.13 The Economy Committee's investigation found that dedicated "anchor venues" are needed, to regularly showcase and celebrate new artists and musicians. But finding such spaces may well be an issue for many boroughs as music venues continue to decline. GLA estimates indicate that 40 per cent of music venues have been lost across London since 2007.[70] The Committee heard that in Croydon, for example, there is no such space, although some capacity is provided through Boxpark Croydon.

[xxi] The Mayor published the final version of the Culture and Night-Time Economy SPG on 3 November 2017

> **Recommendations – Policy H6B Address the cumulative impact of high concentrations of licensed premises**
>
> We welcome the requirement for a coordinated approach to managing and mitigating the cumulative impact of licensed premises. However, we consider that this policy could usefully be amended to reflect the fact that the areas in question may not always sit neatly within a borough boundary, and that sometimes working across borough boundaries will be needed.

> **Recommendations – Policy H6B ensure night-time economy venues are well-served with safe and convenient night-time transport**
>
> We welcome this inclusion. A well-served transport network will be vital to ensuring a spread of night-time activity across the whole of London, and will help ensure the safety of workers in the night time economy as they travel to and from work.

8.14 Good transport links to and from work are essential. Access to transport to enable safe travel at night, and particularly to make connections for onward journeys travelling back from work, could be better. NTE workers represented at the committee's round-table event spoke of the challenges of finding transport for the whole of their homeward journeys, and of feeling unsafe at times.[71] Transport challenges can also affect individuals not typically considered to be working in the NTE such as cleaners, who, following a late shift, might also struggle to access safe, affordable transport.[72]

Improving transport connections

8.15 The launch of the Night Tube in 2016, followed by a night service on the London Overground network last December has helped earn London the right to be considered a 24-hour city. Further extensions to Overground services from spring 2018 are welcome.[73] However, according to London First, London is only just "catching up with international competitors in its support for the night economy".[74] And outer London boroughs remain underserved by public transport, especially at night. The Mayor's draft Transport Strategy acknowledges this problem and the inequity that comes with it. It says: "parts of outer London are cut off from opportunities the rest of the city has to offer by poor Tube, rail and bus links. Poor transport connections compromise economic fairness."[75]

9. Green infrastructure and natural environment

Policy G2 London's Green Belt

Recommendations

We fully support the Mayor's continued protection of the Green Belt. As London becomes more intensively developed the Green Belt will become ever more important. Policy should enhance as well as protect the Green Belt. The Mayor might wish to signal how a "21st Century Green Belt" could offer more strategic benefits to London.

Policy G2 could outline how the Green Belt is fulfilling valuable functions in relation to London's strategic challenges and relevant Mayoral strategic objectives. These might include more food production, better contributions to climate change mitigation and adaptation, a source of sustainable water storage, and so on.

9.1 The Assembly fully supports the Mayor's continued protection of the Green Belt in Policy G2.

9.2 The Green Belt comprises 22 per cent of London's total area. The London Plan strongly supports the protection, promotion and enhancement of London's open spaces and the protection of the current extent of London's Green Belt and Metropolitan Open Land.

9.3 The National Planning Policy Framework (NPPF) consolidates the Government's view on its planning priorities and guidance. It attaches great importance to Green Belts, but recognises that they are capable of being reviewed in exceptional circumstances, through the review of the Local Plan. The Assembly has noted that a number of London boroughs have reviewed, or are reviewing, their Green Belts.

9.4 Some commentators have recently called the role of the Green Belt into question,[76] and have pointed to areas where it may have failed to adequately perform its functions as set out in legislation.[77] To resist this pressure, supporters of the Green Belt need to ensure that its original purposes are being served.[xxii]

9.5 More significantly, if a 21st Century Green Belt could offer more strategic benefits to London it might be able to resist pressure for development. Counter arguments could then be made that it is fulfilling valuable functions in relation to London's strategic challenges. These might include more food

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[xxii] The original purposes of the Green Belt are to: Check the unrestricted sprawl of large built-up areas; Prevent neighbouring towns merging into one another; Assist in safeguarding the countryside from encroachment; Preserve the setting and special character of historic towns; and assist in regeneration, by encouraging the recycling of derelict and other urban land

production, better contributions to climate change mitigation and adaptation, a source of sustainable water storage, and so on.[78] By performing a new range of strategic functions, as well as its original purpose, it may be easier to justify its retention in the face of housing demands.

G4 Local green and open space

Recommendations

Policy G4 C and D need to consider whether loss of local green and open space should be considered outside areas deemed 'deficient'.

Table 8.1 (Public open space categorisation) needs to be reviewed and incorporate categories of open space such as playing fields and small scale open areas used as community resources which are distinct in function and scale to pocket parks. These spaces should be part of the needs assessment specified in G4 C and subject to the same level of protection as set out in G4 1.

9.6   Policy G4 D only resists proposals that include loss of local open and green space in areas of deficiency. There is no similar policy for areas that are not areas of deficiency making them vulnerable to speculative proposals to remove their local open and green spaces. Indeed, the policy appears to sanction the loss of local green and open spaces in areas that are not areas of deficiency, if there is equivalent provision in the local catchment area.

9.7   This policy overlooks the "local" aspect of local green and open spaces as the most important aspect of such spaces: the need to walk further, cross a road or the risk of being outside of the sight line of an adult makes all the difference to access, use and appreciation of local green and open spaces particularly by vulnerable groups such as older people, children and those with mobility challenges.

9.8   The Planning Committee has heard compelling evidence[79] for reviewing the Draft London Plan Table 8.1 to incorporate categories of open space such as playing fields and small scale open areas used as community resources which are distinct in function and scale to pocket parks. These smaller, local, open spaces should be accorded protection too under Policy G4 1.

Policy G5 Urban greening

Recommendations

Policy G5 should be applied to all developments, not just major developments.

> The Urban Greening factor (UGF) of 0.4 for residential developments should be strengthened to 0.8, or it will not have any impact, and may result in loss of biodiversity.
>
> **Policy 3.5 from the existing London Plan should be retained**, if necessary in a form that makes it more effective in the context of permitted development rights.
>
> The current Mayor should refer to the Environment Committee's recommendations, made to the previous Mayor, that some London-wide resource of biodiversity expertise be provided or facilitated for boroughs to help them assess planning applications.

9.9   The Deputy Mayor told the Environment Committee that protections for green space are still strong, especially around designated sites such as Metropolitan Open Land and the Green Belt. He said that protections have in fact been strengthened around small sites.

9.10   The Environment Committee welcomes the continuation and strengthening of protections for green space in the Plan. However, the plan still envisages a large expansion of London's population and economy. This will involve very significant redevelopment and new building, so there will continue to be pressure on green infrastructure and the natural environment. Therefore, the committee wishes to look carefully at the detail of the protection for green infrastructure from different kinds of development, and the other policies for enhancing the benefits and accessibility of green infrastructure.

9.11   Green spaces, including small open spaces, pocket parks and gardens, need greater protection, particularly in the following policies:

- Policy G4 Local green and open space

- Policy G5 Urban greening

- Policy H2 Small sites

9.12   Policy G4, 'Local green and open space', is applicable only to smaller developments.

9.13   Policy G5 applies to large developments. We welcome the UGF, especially in areas of green infrastructure deficiency. However, the policy does not apply to smaller developments.

9.14   However, policy H2 is also applicable to many smaller developments and it establishes a presumption in favour of developments of up to 25 homes which meet criteria including infill, extension and building over gardens on vacant and underused sites, and sites near to transport links or town centres (policy

H2 D). The presumption applies when the developments meet a design code developed in accordance with policy H2 B (which makes reference to increased housing density but not to protecting green space) or, if there is no such code, when the benefits of additional housing provision outweigh the harm to biodiversity, even if that level of harm is at first sight unacceptable (policy H2 E). There also remains a nationally-imposed permitted development right to take up to half of a garden to extend a dwelling.

9.15 With this presumption in favour of small developments, which are exempt from the UGF, and with the expectation that the rate of delivery of housing on small sites will double (policy H2 A and table 4.2), there is a heavy burden on policy G4 D to protect local green spaces against infill development, extension, 'garden grabs' and other forms of housing densification. This is increased by the loss of policy 3.5 in the existing plan, which says:

> "Boroughs may in their LDFs introduce a presumption against development on back gardens or other private residential gardens where this can be locally justified."[80]

9.16 The Environment Committee heard that the effect of the Draft Plan would be that there should be no net loss of green cover in these cases, but that green space such as gardens might be replaced by other forms of green cover such as green roofs. It heard that the previous policy 3.5 was ineffective because of the permitted development right, at least in the case of extensions. We also heard that the Draft Plan would encourage boroughs to resist the loss of small open and green spaces, but that the Deputy Mayor for Planning, Regeneration and Skills, Jules Pipe, could not be sure that this encouragement would be successful.

9.17 If green spaces such as gardens (with UGFs between 0.4 for regularly mown lawns and 0.8 for trees in natural soil) can be replaced by green roofs (with UGFs as low as 0.3 for lightweight systems), there is a risk that the environmental benefits of green space, and access to it, will be reduced even if the area of cover is not.

9.18 In support of this concern, the Planning Committee heard from the London Wildlife Trust that further loss of gardens would have a negative effect on biodiversity. The same meeting heard that there was a lack of biodiversity expertise in the planning process at the local level, with 18 per cent of applications impacting biodiversity, but only one per cent being scrutinised for those impacts.[81]

Policy G6 Biodiversity and access to nature

> **Recommendations**
>
> The London Plan itself should include appropriate reference in its policies (**perhaps G4 and/or G6**) to other Mayoral biodiversity and green infrastructure policy, for example in the Environment Strategy or the All London Green Grid SPG, to ensure that this policy has force within the planning process.
>
> **Policy G6** should 'require' boroughs to take into account Biodiversity Action Plans.
>
> The revised All London Green Grid SPG and green infrastructure challenge maps should be produced urgently.

9.19 The existing London Plan says that development proposals should assist in achieving targets in Biodiversity Action Plans (BAPs) and should not have adverse impacts on species or habitats identified in BAPs (Policy 7.19 C). It also says that boroughs should use the Mayor's Biodiversity Strategy and BAP targets when drawing up local development frameworks (Policy 7.19 F).

9.20 The Draft Plan removes reference to BAPs. We heard that this is being replaced by borough green infrastructure strategies. These strategies are referred to in paragraph 8.4.2 rather than in a specific policy; we heard that the Mayor is promoting their production, and that they "can include biodiversity action planning targets". There are requirements on boroughs to take into account conservation, habitats and biodiversity (primarily in policy G6 Biodiversity and access to nature). The GLA argued that this amounts to the same provision but covers a broader range of benefits of green infrastructure.

9.21 The Environment Committee is not convinced that the biodiversity requirements on boroughs on the face of the Draft Plan are as strong as they are in the existing plan. The discussion at the committee's meeting referred to forthcoming Supplementary Planning Guidance (SPG) on matters such as the All London Green Grid (ALGG), and to the Environment Strategy biodiversity policies and a green infrastructure challenge map that will be produced under the Environment Strategy.[82] We heard that such secondary policies have less force than the London Plan, unless they are specifically referred to in a London Plan policy.

9.22 We welcome a broader view of the benefits of green infrastructure. However, the change of status of these provisions within the London Plan and the lack of specific requirements for the content of borough green infrastructure strategies, or requirement to produce them at all, raises a serious risk that

biodiversity and other benefits of green infrastructure will be equally neglected by resource-poor local authorities.

10.Sustainable infrastructure

Policy SI1 Improving air quality

> **Recommendations**
>
> **Paragraph 9.1.11** should be amended to include that the "further guidance on Air Quality Neutral and Air Quality Positive statements" make reference to the fact that offsite manufactured housing (OSM) can make a positive impact on air quality.

10.1 OSM has a small carbon footprint. Construction materials now make up around 50 per cent of a building's entire carbon footprint. As well as the improved environmental performance, OSM housing can be carbon neutral: "building in timber is carbon neutral, indeed these buildings sequestrate carbon - you can grow housing."[83] Dalston Lane is the world's largest cross-laminated timber building. It has been estimated that the building will save 2,400 tonnes of carbon compared to a concrete building of the same size. The embodied carbon is 2.5 times less than a concrete building. Overall, the structure of the building is carbon negative.

10.2 Transportation and waste in OSM housing are significantly lower. Traditional construction relies on significant numbers of vehicles to transport materials to site and heavy plant to build homes. OSM does not, and this is much appreciated by site managers and the reduced impact of traffic movements, low levels of construction noise and improved local air quality are being noticed by the mainstream media. A recent report suggests that large development sites, with dozens of diesel generators and diesel powered machines, are major contributors to breaches of air quality standards: "a single excavator can produce as much pollution as 14 or 15 double-deckers".[84]

10.3 Additionally, vehicle movements for the delivery of materials are significantly lower. Current, site-based construction involves the delivery of all the materials on an individual basis to one-off sites. With OSM, "the quantities delivered are typically more than one building at a time, therefore maximising the efficiency of transport for the raw materials… This reduces the overall site construction traffic by 90 per cent."[85] For Karakusevic Carson Architects, for example, buildings designed on a computer and built in a factory dramatically reduce the amount of waste needing to be removed from a site. Some commentators estimate the reduction in waste is 90 per cent.

10.4 We strongly support measures to tackle air pollution in London. In line with our response to policy GG3, we 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.

Policy SI2 Minimising greenhouse gas emissions

Recommendations

The Government should update Part L of the Building Regulations, and the Mayor should make it clear that this is necessary and lobby for it.

If the Government does not move quickly to update the Building Regulations, the Mayor should take the lead with London-specific energy efficiency standards. A suitable solution might be to require all developments in London to comply with the on-site energy efficiency standards currently required of large developments.

The Mayor should go ahead with reviewing the housing design guide, with a view to ensuring that all London's new housing is of the highest achievable energy efficiency standard.

The Planning Committee also recommends that the contribution of materials to embodied carbon should be included in the zero-carbon calculation for a development. The methodology for calculating zero carbon should be included in the SPG on Sustainable Design and Construction.

10.5 We welcome the provision in the Draft Plan for major developments to be net zero-carbon, both residential and other. This strengthens the provisions of the existing plan, which applied only to residential developments. There is guidance on energy efficiency in the Sustainable Design and Construction SPG and the energy assessment guidance.

10.6 However, there is no requirement for small developments to go beyond the national requirements of Part L of the Building Regulations. The Environment Committee heard that boroughs can choose to put greater requirements in their local plans, but may not find this feasible, because of the limited capacity of small builders to go beyond a standard specification and the limited capacity of boroughs to monitor the standards.[86] It also heard that Part L is out of date and requires improvement. For its part, the GLA is considering reviewing the housing design guide, and providing support to boroughs.

10.7 There is a serious risk that London will, in the coming years, build itself a heavy burden of buildings with mediocre energy efficiency. There will be many thousands of small residential developments which, on the proposed policies, will meet only Part L requirements, which are acknowledged to be inadequate. Being small developments, largely converting or filling in gaps among older housing and in many cases built to bespoke plans to do so, these will be difficult and expensive to retrofit to an efficiency level that supports London's mid 21st century carbon reduction goals. Experience shows that the building trade gears up successfully to deliver new standards. Establishing

higher energy efficiency standards nationally would drive economies of scale and enable all builders to deliver better energy efficiency. Even a London-wide standard would benefit from the enormous scale of home building expected in the capital over the lifetime of the new plan.

10.8   The Planning Committee notes that the contribution of materials to embodied carbon should be included in the zero-carbon calculation for a development. The methodology for calculating zero carbon should be included in the SPG on Sustainable Design and Construction.

10.9   This new policy is important in the transition to a low carbon resource efficient and circular economy. As an example, we would cite the role of certain materials for their thermal efficiency.

Policy SI5 Water Infrastructure

Recommendations

The Mayor's draft Environment Strategy (Proposal 8.2.1c) said policy on Integrated Water Management Strategies (IWMS) should be included within Policy SI5 Water infrastructure itself.

IWMS should be required for all major developments and Opportunity Areas where particular flood risks or water-related constraints apply, and encouraged for developments coming under any one of these criteria.

IWMS should be considered at the first stage of a development, as with energy master planning.

10.10 The Mayor's Draft Environment Strategy (Proposal 8.2.1c) says:[xxiii]

> "The Mayor will consider Integrated Water Management Strategies in areas where this is appropriate. These include where considerable new development will occur, where there are particular flood risks or water-related constraints such as limited sewer capacity on new development. This is a good way to integrate the provision of infrastructure to collectively manage all flood risks to a site and plan for water infrastructure, green infrastructure and improve water quality in London's rivers and canals."

10.11 We support this policy, having previously advocated integrated water management as the key approach to securing London's water sustainability as

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[xxiii] Proposal 8.2.1c The Mayor, through the London Plan will manage flood risk for new developments https://www.london.gov.uk/sites/default/files/london_environment_strategy-_draft_for_public_consultation.pdf

it continues to grow.[xxiv] The most effective way of minimising the use of treated drinking water will be maximising the use of rainwater and waste water (grey water) where appropriate.

10.12 The Draft London Plan (paragraph 9.5.12) says:

"Integrated Water Management Strategies should be considered for major development locations such as Opportunity Areas, where particular flood risk and water-related constraints such as limited sewer capacity require an integrated approach to the provision of infrastructure and management of risk."

10.13 This is considerably narrower in scope and weaker in effect than might be expected from a reading of the Environment Strategy. Rather than taking large developments, flood risks and limited sewer capacity as alternative criteria for IWMS preparation, it appears that a combination of major development and at least one of the other risk factors is required. Also, rather than the Mayor considering the need for an IWMS, it seems to be left to the consideration of developers.

10.14 The Environment Committee heard that the GLA is confident of securing IWMS when appropriate, by working with developers. However, with no stronger wording than that strategies "should be considered", and in supporting text rather than a policy, this seems to rely heavily on the goodwill of developers. It also heard that IWMS are envisaged only for large 'blank canvass' developments such as Old Oak Common and Park Royal, and not for Opportunity Areas where existing development is in the way of large-scale water infrastructure. However, we consider that the preparation of a strategy would be able to take into account constraints of existing development.

Policy SI6 Digital connectivity infrastructure

Suggested changes

10.15 In its 2017 report, *Digital Connectivity in London*, the Regeneration Committee found that London's economic productivity and international competitiveness face a significant threat in the form of poor digital connectivity.

10.16 The committee welcomes the addition of a new policy on digital connectivity infrastructure in the London Plan. The committee is pleased to see the provision of digital connectivity infrastructure recognised "as important for the proper functioning of development as energy, water and waste management services" which "should be treated with the same importance."

[xxiv] See the Environment Committee's 2016 report on London's long-term growth.

Recommendations

To reflect the spatially dispersed nature of London's connectivity, the committee suggests that **Policy SI6 A** highlights this, and that the wording in bold is added to the policy: "To ensure London's global competitiveness now and in the future, development proposals **in all areas of London** should…"

To reflect the role that Transport for London's infrastructure can play in supporting digital connectivity, we also suggest the wording in bold is added to **Policy SI6 A2**: "ensure that sufficient ducting space for future digital connectivity infrastructure is provided **using new and existing infrastructure, including transport infrastructure**".

Policy **SI6 A4** should be amended to ensure that new infrastructure respects local character. The following wording is suggested: "Support the effective use of the public realm (such as street furniture and bins) to accommodate well-designed and located mobile infrastructure **that takes into account special local characteristics, conservation areas and areas of special character**".

Given the importance of digital connectivity to London's economy, the committee recommends the policy is placed in the Economy section of the London Plan. The Sustainable Infrastructure section should make reference and signpost to Digital Connectivity Infrastructure policy in the Economy section.

Policy SI7: Reducing waste and supporting the circular economy

Policy SI8: Waste capacity and net waste self-sufficiency

Recommendations

Policy SI7 and the supporting text need to make reference to offsite manufacturing's contribution to reducing construction waste (Policy SI7 4 b) – see comments on Policy SI 1 above.

In **Policy SI8 C4** references to combined heat and power and combined cooling heat and power should be deleted.

In **Policy SI8 C3** the words 'renewable energy generation, especially' should be deleted to restrict its application to lower-carbon technologies such as anaerobic digestion.

> The Planning Committee recommends the following additional changes:
>
> In **Policy SI8 C4** references to combined heat and power and combined cooling heat and power should be deleted.
>
> In **Policy SI8 C3** the words 'renewable energy generation, especially' should be deleted to restrict its application to lower-carbon technologies such as anaerobic digestion.
>
> Anaerobic digestion should be actively promoted.

10.17 Both the existing and draft Environment Strategies are based on the waste hierarchy, in which waste reduction is preferred to recycling, recycling is preferred to burning waste for energy, and waste to energy is preferred to landfill or burning waste without recovering energy.

10.18 In the Environment Committee's discussions with the GLA on waste management, it repeatedly heard that the Mayor aims to raise London's household recycling rate to 65 per cent, to seek to minimise waste arising, and to eliminate landfill. It heard that, if these goals are met, London is expected to have approximately sufficient waste-to-energy incineration capacity to handle all its residual waste, but shortfalls in more sustainable forms of waste management capacity such as anaerobic digestion and recycling.

10.19 The Environment Committee has also heard that building new waste to energy incinerators involves the operators signing long-term contracts with waste authorities to feed the incinerator with waste, and pay a fee to the operator. This is how the income for the incinerator is assured and the financing secured. This also has the effect of undermining the business case for reducing residual waste or increasing recycling, since the payment for incineration is committed.

10.20 In the Environment Committee's meeting on the London Plan, it heard that the Mayor's preference is not to incinerate waste and that the lack of need for more incinerator capacity implied in the waste strategy is recognised. It heard that the Mayor does not wish to 'fetter his discretion' over potential future applications to build more incinerator plants.

10.21 The Environment Committee considers that the risk of the Mayor fettering his discretion is contained in the plan as currently drafted. Specifically, in Policy SI8 C3 and 4, the following are particularly encouraged—development proposals which:

- contribute towards renewable energy generation, especially renewable gas technologies from organic/biomass waste

- provide combined heat and power and/or combined cooling heat and power

10.22 These would appear to have the effect of specifically encouraging energy-from waste incinerators, as long as they use organic or biomass waste. Organic or biomass waste is considered to provide renewable energy when burnt. However, this category, in the field of municipal waste, comprises mainly:

- paper and card, which is recyclable if properly separated and so should not be incinerated

- food waste, which likewise should be separated for anaerobic digestion, providing lower-carbon energy than incineration and equally renewable

- garden waste, which can be composted, which again comes at a higher level in the waste hierarchy than energy from waste

Incineration in all three cases is to be minimised under the Mayor's Environment Strategy.

10.23 Moreover, the Planning Committee also notes that incinerators are carbon intensive even when the heat is taken off to provide CHP, incinerators only have to meet a carbon intensity floor of 400g of carbon per kWh, whereas the grid is now decarbonising very rapidly. There are ways to create CHP and CCHP which are low carbon, such as taking heat off data centres, tube stations and using fuel cells.

10.24 The effect of this deletion would not be to absolutely rule out giving permission to incinerators, but would avoid absolutely requiring it, giving the Mayor the discretion he seeks to act in accordance with his Environment Strategy.

10.25 The remaining parts of policy SI8 should encourage the provision of additional sustainable waste management facilities including recycling and anaerobic digestion; we emphasise again London's need for these in the near as well as medium term.

11. Transport

11.1 We welcome the fact that the Draft Plan contains a series of measures that will help to enhance London's transport network, by delivering our shared ambitions for achieving a mode shift to sustainable transport and delivering healthy streets across London.

11.2 We support the objective, as set out in Policy T1, for 80 per cent of all trips made in London to be made by walking, cycling or public transport by 2041. We have already commented in response to the Mayor's draft Transport Strategy that interim targets should be set before 2041, and hope this proposal will be reflected in the London Plan.

11.3 The London Plan is a vital tool in the effort to transform London's street environments. We support the Mayor's Healthy Street agenda, as set out in Policy T2. Transport for London has developed a Healthy Streets check for designers, which should be applied to new developments to ensure they improve opportunities for Londoners to use active travel modes. The Health Committee also strongly supports the evidence-based approach set out in the Healthy Streets model to improve health and reduce health inequalities.

Policy T3 Transport capacity, connectivity and safeguarding

Recommendations

Active travel and bus services should also be given priority alongside major rail schemes and river crossings.

Suggested wording:

D. In Development Plans and development decisions, priority should be given to delivering upgrades to Underground lines, securing Crossrail 2, the Bakerloo Line Extension, river crossings, an eastwards extension of the Elizabeth Line, **local walking and cycling routes and, outside the CAZ, bus network enhancement.[xxv,xxvi]**

[xxv] Caroline Pidgeon AM and Caroline Russell AM propose that road-based river crossings should not be given priority in Development Plans and development decisions. This would apply specifically to the Mayor's proposals for a Silvertown tunnel. Cycling and pedestrian crossings should remain as priority schemes, in order to encourage active travel options without inducing additional motorised vehicle traffic.
[xxvi] David Kurten AM of UKIP believes motor vehicle routes should also be prioritised in Development Plans and development decisions. The objective of this is to ensure the transport network is inclusive to people who have no alternative than to use motorised transport such, as disabled people, and those who use car clubs.

11.4   The Mayor has set several targets that are not adequately reflected in this policy. These targets cannot be met without enhancements to walking and cycling routes:

- For 80 per cent of journeys to be undertaken by walking, cycling and public transport.

- For all Londoners to undertake at least 20 minutes of active travel per day.

- For 70 per cent of Londoners to live within 400 metres of a high quality, safe cycle route.

11.5   The mode share of walking and cycling has not increased significantly in recent years:[87]

- Between 2010 and 2016, the mode share of cycling has increased slightly from 1.7 per cent to 2.2 per cent.

- Between 2010 and 2016, the mode share of waking has decreased slightly from 20.9 per cent to 20.8 per cent.

11.6   Following a decade of strong growth, bus passenger numbers are now in decline. Between 2014-15 and 2016-17, the number of passenger journeys made on buses fell by six per cent.[88] The causes for this include the rise in traffic congestion, which contributed to a 20 per cent increase in excess wait times for buses in the three years to 2015-16.[89]

11.7   The Transport Committee has called for an increase in bus capacity in outer London. Much of London's growth will take place in outer boroughs, which already tend to have poorer transport connectivity based on Public Transport Accessibility Level (PTAL) scores.[90]

11.8   Outer London should offer the most potential for mode shift from cars to public transport, as car use is significantly higher there. On average, Outer London residents make twice as many car journeys than inner London residents, and significantly fewer bus journeys.[91]

Policy T5 Cycling

Recommendations

This policy contains no reference to a target modal share for cycling.

A target model share for cycling should be added.

Suggested wording:

> **The Mayor will work with all relevant partners to bring about a significant increase in cycling in London, so that it accounts for at least seven per cent of modal share by 2041.**

11.9 The Mayor has set a target in his Transport Strategy to increase the combined modal share of cycling, walking and public transport to 80 per cent by 2041.

11.10 The Transport Committee is currently investigating cycling infrastructure, including cycle parking. The report will assess the Mayor's progress in delivering new infrastructure and recommend steps that need to be taken to increase cycling modal share. The report will be published in Spring 2018. The committee may have further suggested changes to this policy at that time.

11.11 Stakeholders engaging with the committee during this investigation have advised that specific targets for cycling are required. Specific cycling targets are necessary to help guide investment decisions, and to allow the Mayor to be held to account. It is also important to ensure that TfL prioritises cycling, rather than relying on public transport to meet the 80 per cent target.

Policy T6.1 Residential parking

> **Recommendations**
>
> This policy needs firmer requirements to provide car club spaces to ensure car clubs becomes a viable alternative to car ownership.
>
> Suggested wording:
>
> D. Outside of the CAZ, and to cater for infrequent trips, **new residential developments must include dedicated car club parking spaces, which are available for use by any car club.**

11.12 Car clubs offer the potential to decrease traffic congestion, by reducing private car ownership, and therefore reducing the number of unnecessary journeys made by car. A survey of car club members by Carplus has produced data to show reduced car ownership and car mileage among long-term members (over six months' membership):[xxvii]

- 26 per cent of respondents said overall car mileage had gone down in their household after joining a car club, while 19 per cent said it had gone up.

[xxvii] Annual survey of car clubs in London, Car Plus, March 2017. Among members of car clubs with fixed parking spaces requiring users to make a round-trip journey.

- 49 per cent owned at least one car before joining a car club, falling to just 23 per cent after joining.

- 11 per cent had sold or disposed of a car in the previous year. One in four stated that car club membership was the main reason or a major factor in their decision to sell or dispose of their car.

- 34 per cent said they would have bought a private car if they had not joined a car club.

11.13 Privately owned cars are parked for 97 per cent of the time.[92] This requires substantial parking provision. If car club vehicles are in more frequent use some existing parking space could be freed up, particularly if private car ownership declines.

11.14 The Mayor and Transport for London have a car club strategy, published in 2015. This set a target for a five-fold increase in car club membership in London by 2025, to one million members.

11.15 This level of membership will not be achieved unless the availability of car club vehicles is increased significantly, especially in Outer London. In 2015, there were 2,480 car club parking bays in London. This is an average of 75 per borough, although there were wide discrepancies. While there were over 200 bays in Camden and Lambeth, eight outer boroughs had fewer than 10 bays. Car clubs report difficulties in obtaining parking spaces on existing residential streets, where most spaces are reserved for use by residents to park.

Policy T7 Freight and servicing

Recommendations

The policy should refer to the Mayor's target for all of London to be within a 30-minute drive of a construction consolidation site.

F. Development proposals should facilitate sustainable freight and servicing, including through the provision of adequate space for servicing and deliveries off-street. Construction Logistics Plans and Delivery and Servicing Plans will be required and should be developed in accordance with Transport for London guidance and in a way which reflects the scale and complexities of developments. **Development proposals for construction consolidation centres should be located in such a way as to cover all of London within a 30-minute drive.**

The policy should seek to reduce the number of personal deliveries being made within central London.

> G. Developments should be designed and managed **so that the overall number of personal deliveries received on the site is minimised**, and so that deliveries can be received outside of peak hours and in the evening or night time. Appropriate facilities are required to minimise additional freight trips arising from missed deliveries and thus facilitate efficient online retailing.

11.16 After a period of stability, LGV traffic has increased by 11 per cent from 3.8 to 4.2 billion kilometres per year since 2012, while HGV traffic has remained stable at 1.0 billion kilometres per year.[93] Vans make up around 80 per cent of commercial traffic in London, and are responsible for almost all the recent growth in freight traffic.

11.17 The growth in freight traffic is a reflection, generally, of the growth of London's population and economy. But the fact that van traffic has outstripped lorry traffic suggests other changes are contributing to the trend, including the restrictions placed on lorries, and the increasing popularity of internet shopping.

11.18 Internet shopping has increased significantly in recent years. In October 2011, 9.4 per cent of all retail spending was online. In October 2016 this had increased to 15.2 per cent.[94] This changes traffic patterns as more vans are deployed, visiting more locations as they deliver packages to consumers and businesses. Traffic is also created by people returning items they have bought online.

11.19 Personal deliveries also cause an increasing amount of freight traffic. TfL has banned staff from receiving personal deliveries at work and urged other companies to do the same.

11.20 Freight consolidation has been effective at reducing delivery traffic. The Mayor is now promoting the use of consolidation centres. In his new Transport Strategy, he has set an ambition for all of London to be within a 30-minute drive of a construction consolidation centre. The London Plan should reflect this policy.

Policy T8 Aviation

> **Recommendations[xxviii]**
>
> The policy should specify that any expansion plans which lead to an increase in road traffic or severe overcrowding on public transport are unacceptable.

[xxviii] Caroline Russell AM would like to clarify that she is opposed to the expansion of Heathrow Airport under any circumstances.

E. **Notwithstanding the policy to oppose the expansion of Heathrow Airport if this results in any additional noise or air quality harm,** all airport expansion proposals should demonstrate how public transport and other surface access networks would accommodate resulting increases in demand alongside forecast background growth; this should include credible plans by the airport for funding and delivery of the required infrastructure. **All airport expansion proposals must demonstrate their delivery will not lead to an increase in road traffic or severe overcrowding on public transport.**

The policy should set a binding target for the proportion of staff and passenger journeys made by sustainable modes.

The policy should reiterate that any surface access measures in airport expansion proposals can only be considered in light of the opposition to Heathrow expansion if this results in noise or air quality harm.

H. Airport operators should work closely with airlines, Transport for London and other transport providers and stakeholders to ensure straightforward, seamless and integrated connectivity and to improve facilities and inclusive access. **They should ensure at least half of all journeys by passengers and staff are made by sustainable means such as rail, bus and cycling,** and minimise the environmental impacts of airport servicing and onward freight transport.

11.21 The Airports Commission projected a rise in the number of passengers using Heathrow from 73 million per year, to 148 million per year by 2050 if a third runway is delivered. This doubling of passenger numbers, in addition to the growth in freight traffic and the airport workforce, will mean that there needs to be a corresponding increase in the capacity of the transport network. To date there is no plan from the airport or the Government to fund and deliver new transport infrastructure to meet this demand.

11.22 The transport schemes identified as being required, if a decision is made to expand Heathrow, include an upgrading of the M4, M25 and other local roads, and an upgrading the London Underground's Piccadilly Line, Crossrail, High Speed 2 and the 'Southern Rail Access' scheme connecting Heathrow to Waterloo. It is likely that further schemes would be required to support a 'full utilisation' scenario by 2050, as set out above. This would represent a highly ambitious and costly programme of upgrades.

11.23 We understand that the Airports Commission has estimated that the cost of upgrading surface transport upgrades for an expanded Heathrow – for the 2030 scenario – is around £5.7 billion. This represents only a part of the total cost of the required upgrades, because the Commission has only cited the costs supposedly 'directly' attributable to Heathrow. The total cost of the

identified upgrades is likely to be around £15-20 billion, as estimated by Transport for London.

11.24 Proposals for airport expansion need to include clear guarantees that the required transport infrastructure will be delivered. Without new infrastructure, congestion on the road network around Heathrow will increase significantly, and overcrowding on public transport services to Heathrow will become severe.

12.Funding and monitoring

Funding

12.1 Paragraph 11.1.25 sets out how the Mayor will address the capacity constraints of the housing sector will be addressed, including through a new Construction Academy Scheme. This paragraph needs to be expanded and cross-referenced to Policy E11.

12.2 The Assembly is concerned that much of the Plan is predicated on additional funding being made available from Government. The London Plan notes that there is a 'significant gap' in the funding required and the funding currently committed to London's growth.[95] The Mayor outlines two main options for raising the funds needed: fiscal devolution and sharing in land value uplift. On the latter option, we are pleased that the Mayor is working with Government and Transport for London (TfL) on a Development Rights Auction Model. However, should this and further fiscal devolution prove unsuccessful, it will be extremely challenging to deliver the London Plan. As Jules Pipe, Deputy Mayor for Planning, Regeneration and Skills told the Planning Committee:

> "If we cannot either get fiscal devolution or if the Government, alternatively, does not step back into the space of subsidising social infrastructure to levels that it was previously or approaching those levels, if all we are left with is trying to tax developments to deliver all of this, then, no, I do not think we will deliver it".[96]

Monitoring

12.3 We are concerned about the reduction in the number of Key Performance Indicators (KPIs). **Paragraph 12.1.2. and 12.1.3** explains that there will be fewer strategic KPIs in the London Plan compared to previous years reflecting the Mayor's strategic priorities. Instead there will be comprehensive set of complementary and more detailed data and performance measures which sit alongside the KPIs in the Annual Monitoring Report. We are concerned that the removal of this information will pose significant challenges for ongoing scrutiny and would like more information on how this information can be accessed.

KPI: Provision of cultural infrastructure

Recommendations

We would like to see recognition of the difference in the nature of cultural infrastructure in different areas and neighbourhoods reflected in the KPI for cultural infrastructure (Policy M1 Monitoring, table 12.1, p.459).

12.4 The London Assembly Regeneration Committee's report *Creative tensions: Optimising the benefits of culture through regeneration* made several recommendations to the Mayor on how to support London's culture and

creative sector and the Committee is pleased to see several new policies promoting the culture and creative sectors in London.

12.5 We welcome the direction to use Community Infrastructure Levy (CIL) to support cultural infrastructure, as well as other uses such as health and education, alongside with more traditional CIL uses such as transport and housing (Policy DF1 D2 and D3). We would like to see this commitment recognise the difference in the nature of cultural infrastructure in different areas and neighbourhoods - for example, cultural infrastructure will be different in Outer London compared to the Central Activities Zone, yet of equal importance and value.

KPI: Health inequalities

Recommendations

We would strongly urge the Mayor to reinstate the KPI for reducing health inequalities in the final London Plan, with indicators aligned to those developed for the Health Inequalities Strategy.

12.6 The previous iteration of the London Plan included reducing health inequalities as a specific KPI. There is no corresponding KPI for reducing health inequalities in the current consultation. The Health Committee has expressed its concern over the lack of indicators by which to measure the Health Inequalities Strategy and reiterates this concern here: specific indicators are needed to monitor the delivery of the Plan and its objectives. We understand that indicators for reducing health inequalities are being developed.

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Other formats and languages

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Chinese

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ਜੇ ਤੁਸੀਂ ਇਸ ਦਸਤਾਵੇਜ਼ ਦਾ ਸੰਖੇਪ ਆਪਣੀ ਭਾਸ਼ਾ ਵਿਚ ਲੈਣਾ ਚਾਹੋ, ਤਾਂ ਕਿਰਪਾ ਕਰਕੇ ਇਸ ਨੰਬਰ 'ਤੇ ਫ਼ੋਨ ਕਰੋ ਜਾਂ ਉਪਰ ਦਿੱਤੇ ਡਾਕ ਜਾਂ ਈਮੇਲ ਪਤੇ 'ਤੇ ਸਾਨੂੰ ਸੰਪਰਕ ਕਰੋ।

Hindi

यदि आपको इस दस्तावेज का सारांश अपनी भाषा में चाहिए तो उपर दिये हुए नंबर पर फोन करें या उपर दिये गये डाक पते या ई मेल पते पर हम से संपर्क करें।

Bengali

আপনি যদি এই দলিলের একটা সারাংশ নিজের ভাষায় পেতে চান, তাহলে দয়া করে ফোন করবেন অথবা উল্লেখিত ডাক ঠিকানায় বা ই-মেইল ঠিকানায় আমাদের সাথে যোগাযোগ করবেন।

Urdu

اگر آپ کو اس دستاویز کا خلاصہ اپنی زبان میں درکار ہو تو، براہ کرم نمبر پر فون کریں یا مذکورہ بالا ڈاک کے پتے یا ای میل پتے پر ہم سے رابطہ کریں۔

Arabic

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Gujarati

જો તમારે આ દસ્તાવેજનો સાર તમારી ભાષામાં જોઈતો હોય તો ઉપર આપેલ નંબર પર ફોન કરો અથવા ઉપર આપેલ ટપાલ અથવા ઇ-મેઇલ સરનામા પર અમારો સંપર્ક કરો.

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