

A CITY FOR ALL LONDONERS: COMMENTS BY THE LONDON FORUM OF AMENITY AND CIVIC SOCIETIES

The London Forum of Amenity and Civic Societies is a charity formed in 1988 to network, support, inform and represent community groups across the capital. We are an umbrella group for some 130 civic and amenity societies across London.

Overall Comments

The London Forum **welcomes** this document which sets out the Mayor of London's values and position with regard to a range of his forthcoming strategies, with particular reference to his proposed review of the London Plan. We consider that by setting out his values and aspirations for London he has introduced new dimensions that will shape the new plan and provided a vision for London that now needs articulating through the London Plan and the Mayor's other strategies.

This is a major challenge – to express the London Plan in terms of these aspirations, to paint a picture of what would be a successful outcome, set out the strategy and policies for getting there and to produce a more relevant set of key performance indicators that will measure its achievements. It will mean translating the current London Plan into a new plan that expresses the Mayor's values and aspirations, communicating them clearly and breathing life into what has been seen as a primarily technical/legal document.

Link with Local Plans: The link between the London Plan and London Borough Local Plans is essential. The new London Plan should contain for each appropriate Mayoral policy clear guidance to Boroughs both for local policy making and for decisions. The GLA should ensure that Local Plans do use the London Plan to shape their plans, should ensure general conformity and, where appropriate, should ensure the London Plan is used in assessing proposals for development.

Key Issues:

London Forum's key issues include:

- ensuring that in accommodating growth and raising densities we create a city where local communities are comfortable with the scale and nature of change in their neighbourhood. This may set limits to the scale of intensification and the acceptability of new tall buildings
- exploiting "good growth" with higher densities to be used creatively to make more sustainable neighbourhoods, more accessible and affordable housing and able to support a wider range of accessible local services
- making inclusive, accessible, walkable, resilient neighbourhoods the building blocks for supporting London's local communities

- planning for objectively-assessed need for employment land in the right locations, especially offices
- delivering enough homes to rent at prices each section of the communities can afford

Our short paper describing this is attached as Annex 1 to this submission.

Mayor's Foreword

This section emphasises creating opportunities, tackling inequalities and the strain that growth has placed on housing, transport, health and education. Creating a better city for all means not only providing access to jobs and culture, **but** also strengthening local neighbourhoods by creating access to essential social infrastructure – primary schools, GP surgeries, local shops, local open spaces. There must be greater equality of access to opportunities and essential day-to-day services and opportunities for participation will be crucial. The Mayor must provide the lead – the boroughs need to deliver sustainable, accessible neighbourhoods.

Executive Summary

The rate of change – growing population, increasing diversity, the uncertainty of Brexit and the effects of climate change – are major challenges that set the tone and the direction of travel. The need is to bring all of the Mayor's strategies forward as an integrated response.

Context

The policies of the London Plan and its targets will need to be phased through the period it covers due to the current backlog of housing need and the uncertainties caused by the EU referendum result and the Government's options for exit from the EU. Changes in the economy could be as important as changes in population and they are related.

Part 1: Accommodating Growth

London Forum **supports**:

- accommodating as much of London's growth as possible within London
- protecting land for employment across the city, especially in the central area – **but** we also need to plan for objectively-assessed need for employment land in the right locations, especially offices.
- intensifying development around stations and well-connected town centres, **but** not just for housing – these are preferred locations for employment, especially offices
- mixed-use development
- better access to affordable housing, jobs, culture and social infrastructure, to support local communities and strengthen neighbourhood and town centres
- the environment being protected and enhanced

Part 2: Housing

London Forum **recognises** that:

- the failure of housing completions to meet both need and demand for housing
- this is a perennial problem to which there is no quick solution
- developing TfL and other public sector land could help, **but** it must be at existing land values, not sold to developers for profit.
- there is need for a variety of affordable housing types, **but** the Mayor's wish to approve all developments delivering 35% affordable housing would make it difficult for boroughs with a 40% or 50% target of their own

to achieve their aims on some new developments. Also, the Mayor must define the descriptions and sizes for the three types of affordable housing he has indicated as a requirement and set targets for each

Part 3: Economy

London Forum supports:

- preserving and enhancing London's global competitiveness
- delivering world-class transport infrastructure, **but** also much better and imaginative management of demand
- protecting our environment and world-class culture
- promoting economic activities across London, day and night and, in particular, to take account of the needs of small businesses

to encourage businesses to choose London, **but** also to increase opportunities for all Londoners.

We **support** all that is proposed for London's Economy, **but** light industrial land must be better protected than in recent times. The introduction of housing into such business areas too often results in displacement of remaining industries that cause any noise, traffic or odours.

Part 4: Environment, Transport and Public Space

London Forum supports:

- tackling threats from climate change
- improving the health and wellbeing of Londoners, especially by greatly improving air quality
- protecting and enhancing London's environment;
- reducing traffic and encouraging cycling and walking on "Healthy Streets", **but** securing parity of support for pedestrians and cyclists
- protecting the city's heritage and culture
- promoting good design in public spaces, **but** giving more emphasis to creating places that people can enjoy

Part 5: A City for all Londoners

London Forum supports:

- promoting social integration through addressing inequalities, tackling disadvantage and discrimination
- promoting full participation in the life of our city, particularly at the local community level
- providing affordable, accessible transport, improvements to health to reduce health inequalities
- ensuring the city's cultural offer continues to thrive

- promoting social cohesion

In summary, this will be a challenging agenda for translating into planning policies, especially at the neighbourhood level.

London Forum **strongly welcomes** the Mayor's initiatives to date on air quality, fares, the night tube and Hopper bus ticket.

London Forum looks forward to commenting on the Mayor's detailed strategies.

Main Text

Part 1: Accommodating Growth

London Forum recognises that the Mayor, through the London Plan, can decide where in London development should take place, can identify locations in which to concentrate development and will consider the tangible effects of planning on the way Londoners experience the city as part of his vision for "good growth".

Competing and Interrelated Land Use

We consider that there must be policies to reduce the use of land for properties for overseas investors and to address unimplemented permissions. The targets for homes should be for each type that is required in each borough. Sites used for large units which do not make the best use/optimise the development potential of the land **and** do not meet the objectively-assessed need by Londoners for a home should not count toward meeting the Mayor's housing targets.

Growth Locations

We recognise that there will be considerable growth, and that there will be a need to intensify development, especially in well-connected locations that are well-served by existing or planned transport capacity. Plans of for transport and housing and other land uses must be co-ordinated to make the best possible use of space - to get the right things built in the right places.

We would remind the Mayor that there has been a London Plan Policy 2.16 for Strategic Outer London Development Centres and Table 2.1 which identifies locations for potential consolidation/break-bulk facilities, which do not seem to have been progressed. The Mayor must take a more positive role to ensure that such facilities are developed.

We consider that higher density development will be acceptable where it is suitable in the local context. The London Plan should promote site allocations and land assembly in order to be able to build higher density developments at

medium heights to avoid harm to local character and views.

One of the strongest statements in this part is that the Mayor wants to "get the right things built." London Forum **strongly supports** this and the London Plan should help boroughs to resist schemes that are for developers' profits rather than meeting the needs of Londoners and businesses.

London Forum **welcomes** the Mayor's intention to resist permitted development of offices to housing unless it can be justified. A lot of harm to London's economy has been caused by that Government diktat and the Mayor should negotiate exceptions for London to Government policies where necessary.

Employment land in Central London

We recognise that the City of London, Canary Wharf, the West End and parts of the Central Activities Zone will remain the primary places of work for many people.

London Forum **strongly supports** the Mayor's commitment to resist moves to convert offices to housing in Central London unless this can be justified, but is disappointed that there is no similar commitment to London's major town centres.

London Forum also **strongly supports** public transport improvements in Central London, and, particularly, the Mayor's commitment to improve streets for pedestrians and cyclists.

Employment land across the city

We **welcome** the commitment to foster a fairer, more accessible city by encouraging development in non-central locations with good public transport, and specifically to promote viable strategic locations for office space, including Outer London. We would, however, prefer a specific commitment to devolution of offices to major suburban centres.

London Forum **supports** the use of transport investment as a catalyst for regeneration and development in Outer London.

We **strongly support** a compact and connected city of identifiable neighbourhoods with more cycling and walking (i.e. walkable neighbourhoods) and public transport use to reduce our dependency on cars. We advocate strengthening neighbourhoods as the building blocks for a more sustainable city.

London Forum is, however, **unconvinced** by the concern about the "absence of river crossings", **but** welcomes any that focus on pedestrians, cyclists and public transport. New East London river crossings must be designed to avoid creating additional areas of congestion and any temptation for long-distance lorry drivers

to divert to use them to cross London.

The Bakerloo Line extension and Crossrail 2 may need further assessment of how their extremities serve the needs of key development zones and which other transport routes they would help to make less overcrowded.

London Forum **supports** improved bus services in outer London to connect people to where they work and where social infrastructure and town centres are located. Some of those new routes may need to be limited stop type to ensure fast journeys and tempt people away from use of their cars.

Housing and mixed-use land

London Forum **supports** using land intelligently, and releasing for housing industrial land that is unlikely to be needed for future employment use, **but** wherever possible, to retain employment uses alongside housing.

Relocating industry to other areas of London must be done carefully to avoid separating businesses from their clients, partners and suppliers and to limit any increase in traffic movements. We are **concerned** that more new development in and around town centres should be done in a way that recognises the value of 'back-street' small businesses and does not force them out by redevelopment or increased rents.

We **support** focusing development in town centres, which are hubs for economic and community activity, and close to a wide range of facilities and social infrastructure. The potential should be explored for significant and much higher-density housing around a number of stations.

Intensifying development in and around town centres, often through significant redevelopment, could cause long-term disruption and even result in the loss of small-scale economic activities that rely on affordable workspace and are fundamental to the local economy. Avoiding such damage will require a commitment to reprovisioning space. The real issue, however, is how well and how sensitively we deal with the scale of this development.

We, therefore, **endorse** the Mayor's concerns that current residents should feel comfortable with the scale of change at the local level and **strongly welcome** the Mayor's commitment to new developments that are desirable places to be. It is essential that we build desirable places to live with a range of environmental and social infrastructure, access to jobs and leisure, and resilient, housing-led, mixed-use developments.

We believe it is possible to increase the density of our neighbourhoods without sacrificing their character and "feel". This will, however, require sensitivity and a commitment to improving access to a range of day-to-day local facilities.

Housing and infrastructure investment

London Forum **welcomes** the use of new transport infrastructure to stimulate new housing developments, **but** is concerned that a feature of many Opportunity Areas is limited public transport accessibility and capacity.

London Forum **accepts** the concept of Opportunity Areas, **but**, in the light of the Mayor's aspirations for types of homes and businesses, we suggest the current Development Frameworks for those areas should be re-examined to ensure they will meet London's needs.

Some form of Local Plan should be prepared for each of the main Opportunity Areas, as is being done now for Old Oak and Park Royal. If that is not done, their development will be led by applications for schemes that might not be appropriate. The problem of the Crossrail train depot at Old Oak is an example of the kind of hurdle that may prevent optimising growth in other Opportunity Areas unless they are re-assessed. The transport improvements in some of them will have to be phased with the development.

Good Growth

London Forum **agrees** that accommodating rising population and economic growth will change our experience of the city, and we **share concerns** about the pressures this could put on local services, changes to the community and to the character of areas and the potential damage to the local environment.

We **agree** that we need to learn lessons from our past mistakes – including developments in the last decade – and make sure we do not repeat them. We, therefore, **strongly endorse** the principles of “good growth”.

London Forum **considers** that these principles underpin the concept of sustainable, walkable, resilient neighbourhoods. The current London Plan, after having identified this as one of the Plan's six strategic objectives for a more sustainable, more equitable city, singularly failed to articulate the concept.

Good growth can and should be used to support accessible, sustainable and resilient communities which provide people with greater access to a wide range of opportunities.

Green growth

London Forum **strongly supports** ensuring that London remains green and healthy through improving air quality, ensuring easy access to green space, greater use of cleaner energy and building resilience to the impacts of climate change. However, there is no mention of the use of sustainable urban drainage

(SUDS). London Forum believes the Mayor should ensure SUDS is built into all developments. This should embrace the use of permeable tarmac for all roads and hard surfaces and the use of soak-aways into subsoil in those areas of London where they would be suitable. Boroughs may need further guidance about such areas so they can apply the most appropriate conditions to planning permissions.

Cultural capital

London Forum is **concerned** that the quest for more sites for housing has put pressure on London's community and cultural assets. We **welcome** the Mayor's determination to protect these assets which enrich our lives, yet are vulnerable to development pressures.

We **support** the proposal for a cultural infrastructure plan and the proposed SPG on the night-time economy. We particularly **welcome** the 'agent-of-change' principle, which could help to prevent the loss of premises for small businesses and cultural purposes. This should include the need to keep low the rents for use of TfL and Network Rail arches under rail viaducts.

Infrastructure for people and communities

London Forum **strongly supports** the strong emphasis on planning for social infrastructure – childcare, healthcare, community spaces and places to meet –in order to ensure that we shall have the range of local services to support the needs and priorities of communities and neighbourhoods. This will need elaboration of the support that neighbourhoods will need as the basic building blocks of the city.

We **welcome** the positive emphasis on the requirements for social infrastructure. We **propose** that land is reserved for new schools or the expansion of existing ones. In the absence of such allocations, boroughs are permitting new schools or extensions on Metropolitan Open Land or on existing schools' playgrounds and playing fields.

Changing the way we travel

London Forum **endorses** the need for a new transport strategy that will rely less on new infrastructure and more on managing demand in a way that will lead to less car use. We agree that existing road space needs to be used more innovatively as well as giving greater priority to walking and cycling.

London Forum **supports** the intentions for reducing the use of cars, and believes that more road pricing should be introduced and levies applied to workplace parking spaces. London Forum **supports** reduced car use in Outer London through the provision and promotion of more cars for rent by the hour. This has

been demonstrated to lead to some people giving up their own vehicle.

We **strongly support** the “healthy streets” initiative which will greatly contribute to our quality of life, especially in the “places” that matter – town and neighbourhood centres. We hope that the Mayor’s Transport Strategy will give equal priority to both the cycling and pedestrian environment.

Increasing transport capacity

We are particularly pleased to see the reference to a north-east to south-west link in the context of Crossrail2. We wholeheartedly agree that London needs this, rather than another north-south link. Thameslink 2000 is at last nearing completion and will meet the immediate need for that.

Whilst increasing capacity is seen as essential to tackle overcrowding, it is also needed to cope with intensification. Major intensification around the mainline termini – Victoria, Waterloo, London Bridge, etc – and especially the City of London which are already above their present capacity.

Conclusion

London Forum **agrees** that a judicious balancing of needs is required. There will have to be a significant behavioural change – to prioritise quality of life, protect the environment and promote social integration. A greater emphasis on demand management and placemaking will be required.

Part 2: Housing

Impact of housing in London

London Forum **agrees** that there is a serious problem, in that housing costs are driving key workers from Central and Inner London and subjecting them to increased travel costs which may force them to give up their essential jobs in the capital. Specialist housing for key worker groups will be necessary.

A Complicated Challenge

The 270,000 homes in London with planning permission must be analysed by boroughs and the GLA. It has to be clear when approval will expire and what negotiations will then take place based on the Mayor’s aims and targets. Landowners may need to be introduced to developers and support might be needed with land preparation or negotiation on legal agreements.

Homelessness

Temporary accommodation is a large cost to boroughs. Hounslow Council has formed a development company 'Lampton 360', and it is buying properties for conversion to house those without a home. The Mayor should consider advising other boroughs on doing that. Further centres like Centrepont may be needed in London.

London Forum **strongly agrees** that a shortage of truly affordable housing is a drag on the attractiveness of London as a place to live and work, and that delivering better, genuinely affordable homes for Londoners who need them is one of the biggest challenges that London faces.

London Forum **agrees** that a bold, ambitious approach is needed tailored to London's needs.

Affordable housing

We **support** the long-term target that 50% of new homes built should be affordable. We recognise that this is aspirational, but agree that this should be the ambition. We **support** the need to deliver a range of types of affordable housing, as well as market housing to buy or rent.

The Mayor's wish to approve all developments delivering 35% affordable housing would make it difficult for boroughs with a 40% or 50% target of their own to achieve their aims on some new developments. Also, the Mayor must define the descriptions and sizes for the three types of affordable housing he has indicated as a requirement and set targets for each.

London Forum is **concerned** that S.106 contributions to provide affordable housing away from the development site are not being spent. In some cases, such as Westminster, there is no land for using the funds and building affordable homes in other boroughs with funds provided by developers in Central London will require complicated revisions of legal agreements and could result in lower contributions. The GLA should assist in that process. The amounts of S.106 funds that are about to lapse should be monitored and reported.

Building more and increasing housing supply

London Forum **agrees** that intensification around town centres and stations will be needed, including more intensive use of TfL land.

London Forum **proposes** that TfL land may need to be used for mixed-use development of offices in town centres.

Land adjoining that owned by TfL should be considered with the aim of assembling development areas that would deliver more homes at appropriate densities as determined by the density matrix and include any necessary infrastructure. The same should apply to all publically owned land in London.

The involvement of small and medium builders should be developed by partnership working.

London Forum **welcomes** the review of the Old Oak and Park Royal Development Corporation's progress and plan. The planning frameworks for all OAs should be examined to ensure they will meet the Mayor's new policies, aspirations and targets.

Private rented sector

'Build-to-Rent' development will need controls on tenancies, fees, rents and maintenance. The Mayor should advise local authorities how they can best implement licensing schemes for the private-rented sector.

Housing in a global city

London Forum is **concerned** about the development of a significant amount of new housing that is sold overseas as investments or "second homes" and remains empty for all or most of the year. These are often large units and the developments fail to optimise the development capacity of the sites. These sites are "wasted" in the sense that they provide too few units and because these units are not occupied as primary residences they fail to meet the "objectively-assessed need" of Londoners. We question whether they should count toward meeting borough targets.

London Forum **strongly supports** the comments on empty and second homes, and looks forward to the Mayor's "appropriate policy responses".

Part 3: Economy

London Forum **supports** the Mayor's commitment to protecting and enhancing London's global competitiveness through the use of his planning and transport powers.

We **support** greater connectivity in support for growth of housing and jobs, but are very concerned about Government choices relating to HS2 and airport expansion. If HS2 were to terminate at Old Oak there would be no need to carry the line through to Euston because Crossrail 1 would disperse arriving passengers from Old Oak. An HS2 terminus at Euston would overload the Underground services there and cause the destruction of a lot of social housing. The money that would be spent on tunneling into Euston could be spent on Crossrail 2. The Mayor should make this case to the Government.

We are **concerned** about London's future ability to attract talent as Brexit proceeds.

We **support** the Mayor's commitment to maintain London's competitiveness by improving the quality of life that London offers.

We **support** the provision of more childcare and school places.

Economic opportunity across London

London Forum **supports** increasing hotel provision in Opportunity Areas and town centres in Outer London with good connections to Central London.

Night-time economy

London Forum **agrees** that London's night-time economy needs to be supported and better managed. The cultural offering needs to be developed and protected from the effects of redevelopment and rising rents for small businesses and places of entertainment. The night-time economy needs just as much management as the day-time management of town centres.

Each town centre needs an active town centre partnership and a town centre manager to bring together all 'players' in partnership.

Small and medium-sized businesses

London Forum **strongly supports** the Mayor's priorities for small and medium-sized businesses, especially by protecting existing workspace, identifying new workspace areas and including workplaces in new housing developments. We are, however, **concerned** that major redevelopments in town centres and the continuation of permitted development rights to change use to housing could reduce the supply of such premises and may have damaged the local economy.

The conversion of offices to housing has also driven out social enterprises and voluntary groups. Their services are part of local infrastructure and premises for them must be created at prices they can afford in new developments. Affordable workspace is a critical element for both SMEs and the voluntary sector.

Part 4: Environment, Transport and Public Space

London Forum **strongly supports** the Mayor's commitment to make London the greenest of all global cities – a healthy, resilient fair and green city.

Integration

We **support** the proposed comprehensive appraisal which will appear in the forthcoming environmental strategy, dealing with biodiversity, green space, air quality, noise, flooding, drainage, sewerage, water quality and supply, climate change resilience, energy, landfill, recycling and waste.

We **support** a more integrated approach and expect the London Plan to set an example for other strategies.

London Forum **welcomes** the intention to plant trees in roads. Contributions towards a fund for this purpose should be sought from Government, large organisations, local businesses and donations by residents for their own street. Some coordination will be needed for planting trees in London's worst pollution areas and that could include more hedges and bushes wherever suitable.

Enhancing the environment

Nature-based approaches to alleviate flood risk should be coupled with full implementation of sustainable urban drainage methods in all new developments, and the resurfacing of existing large areas of hard surfaces, such as car parks, with permeable tarmac.

A healthy, resilient, fair and green city: Air Quality

London Forum **strongly supports** the Mayor's recent initiatives to tackle air quality and **strongly welcomes** the proposed introduction of:

- an emissions surcharge in 2017 for high-polluting older vehicles in Central London
- the Central London Ultra-low emission Zone (ULEZ) in 2019
- potentially enlarging this to cover the area within the North and South Circular Road for all vehicles and London wide for the most polluting heavy vehicles.

We also **support** the commitment

- only to procure green buses by 2018 and all double-decker buses to be hybrid by 2019.
- to tackle building emissions that affect air quality
- to lobby the Government to introduce a 21st century Clean Air Act
- to introduce a significant diesel scrappage scheme.

Reducing air pollution should be a major project of the GLA, boroughs and the users of commercial vehicles. The announcement by the Mayor on 7th December 2016 of doubling expenditure on cleaning up London's air is **welcomed**, as are the emissions surcharge and the ULEZ zone, **but the boundary of that should be extended beyond the North and South Circular Roads to embrace existing areas of high air pollution and particulates.**

The Mayor's call to Government for a 21st century Clean Air Act and changes to excise duty and a diesel scrappage scheme is supported strongly. London Forum does not, however, support the introduction of a diesel scrappage scheme, as this would reward people who own high polluting diesel vehicles at the expense of those who do not, so contravening the 'polluter pays' principle.

A resource –efficient city: Zero carbon by 2050

London Forum **strongly supports**:

- reducing our reliance on fossil fuels;
- developing the circular economy to reduce waste; and, especially
- reducing our dependency on cars.
- drawing up a road map toward a zero carbon city by 2050.

We would also press the Mayor to recognise that we must reduce the need to travel.

We **support** the use of locally-produced energy, the promotion of energy efficiency and the use of new technologies.

Cycling and walking

London Forum **strongly supports** the creation of “Healthy Streets” which seek to:

- reduce traffic, pollution and noise
- create more attractive, accessible and people-friendly streets

We recognise that this will require at least a decade of consistent application of this priority to bring about the scale of change that London needs.

London Forum **strongly supports** a pedestrianised Oxford Street, subject to it not discouraging existing through bus services. There should be a programme of schemes to transform other streets/places into places for people. This programme will need to receive the same degree of priority and funding as the Mayor has given to encouraging cycling to make it easier and safer.

We **support** Quietways, but are concerned that Cycle superhighways, although helping cyclists, may adversely affect buses.

Public Space

London Forum **strongly supports** the creation of an open and accessible network of well-designed and functional spaces to improve London's

attractiveness as well as providing a high quality of life and promoting social integration for existing residents.

Good architecture and design

London Forum **agrees** that the London Plan has a key role to play

We **welcome** the London Plan seeking to maintain high standards in the built environment, but **strongly regret** that the existing London Plan policy for tall and large buildings (Policy 7.7) sets too low a bar for quality. It merely suggests that that they “ should not have an unacceptably harmful impact on their surroundings.” The policies in the plan will need to be robust and not open to alternative interpretations.

We **strongly support** the Mayor’s commitment that we should respect the distinct character of different parts of the city, recognising that London’s villages and quarters have developed along their own lines over the centuries and have come to form a hallmark of London’s character. This ticks both the box of being sensitive to the character of a neighbourhood and that of neighbourhoods being the building blocks of the city.

Higher density (See also Annex 2)

London Forum **strongly supports** the statement that “higher density does not necessarily mean high rise” and that greater densities can be achieved through a range of designs, including mid-rise buildings. We are, however, concerned that this has not been observed in the buildings produced over the last decade – indeed densities have frequently exceeded the top of the appropriate density range, with little justification.

The London Forum **strongly supports** the density matrix and its use to determine the appropriate density and capacity of a site. We are **concerned** that densities have been greatly exceeded in Opportunity Areas where existing or even future public transport accessibility levels would not support it.

London Forum **strongly supports** the use of the density matrix both for assessing the capacity of housing sites and for determining the appropriate density range for sites in particular locations. We are, however, **concerned** about how the matrix is being “stretched” to widen the “context areas” by extending them to 1km walking distance

Tall Buildings

We are **very concerned** that the Deputy Mayor for planning under the last Mayor encouraged, and was indeed an advocate of tall buildings. This has left us with a legacy of some 400+ tall buildings that belie the mantra that “higher density does not necessarily mean high rise”. Although the policy for tall buildings could and should be improved, the key issue is what message the new London Plan gives to the development industry and whether expiring consents are renewed or not in the light of changing concerns.

We are, therefore, **concerned** by the statement that the Mayor sees “tall buildings continuing to play a role in the future of London.” Given that higher densities do not necessarily mean high rise, we are **strongly sceptical** as to what role tall buildings might play and in what circumstances.

However, we **welcome** the statement that tall buildings will only be permitted if they can add value to the existing community, that they must make a positive contribution to the streetscape and skyline and that careful account must be taken of the way the building relates to activities at ground level, as well as the effects it would have on local daylight, wind turbulence, glare and noise. In addition, where appropriate tall buildings will need to provide affordable housing and workspace.

We **are not convinced** that there is a continuing role for tall buildings in the future of London. Few make a positive contribution to the character of London – too many have been allowed which now need to be reassessed against a tougher set of tests to assess their appropriateness for London and their impact on the character of London’s neighbourhoods

We consider that there needs to be a culture change in the approach to tall buildings which will require developers to demonstrate why a tall building is the most appropriate solution. At present the London Plan appears to ask why not rather than why we need more tall buildings. If tall buildings are not essential to achieving higher densities, proposals need to demonstrate both the need for and the appropriateness of high-rise/tall buildings. The onus of proof should be on justifying why they are the preferred solution.

London Forum **considers** that this forms the basis for a more demanding set of “tests” for assessing new proposals and reassessing schemes seeking renewal of consent.

Basements

The London Forum **welcomes** the Mayor’s proposal for a policy on basements. This would elevate the issue beyond the current Housing SPG.

London's heritage

We **welcome** the Mayor's support for London's historic environment and protected heritage assets. London's image is based on its character **not** on tall buildings, which mostly detract from its image.

We **support** Historic England's views on this document set out in "Keeping it London: Putting Heritage at the heart of London's Future".

Inclusive neighbourhoods

London Forum **strongly supports** the Mayor's proposal to include an inclusive neighbourhood principle in the London Plan.

We **propose** that the concept of inclusive neighbourhoods should be the basic building block for supporting London's local communities.

This is so much more than the current London Plan's "lifetime neighbourhoods" (Policy 7.1) – it is not just about a better mix of adaptable, lifetime housing, **but** about an approach which embraces all the ingredients is needed to support and maintain accessible, walkable, sustainable, resilient neighbourhoods.

It will mean harnessing the additional density associated with "good growth" to support a wider range of local services within easy walking distance, to ensure that communities are strengthened by reinstating lost facilities and providing better access to social infrastructure (childcare, primary school, open space, GP surgery, local shops, meeting places)

We **propose** that the revised London Plan should embrace neighbourhoods as the building blocks with which build to create more sustainable, more accessible, more inclusive and more resilient communities. It also needs to encourage active participation of the communities themselves in shaping their own future.

We **propose** that neighbourhoods should be presented as a key part of London's geography, with a policy of encouraging London Boroughs to make these their units for delivering greater access to the day-to-day services they need, not only by protecting existing facilities, but also by planning for future provision. This will involve making more facilities available within walking distance, and changing communities from being socially-excluded to being more inclusive and cohesive, such as supporting the development of facilities such as places to shop, places to meet, open spaces, childcare, GP surgeries, all contribute to that.

We **propose** that the new policy in the London Plan should be supported by an SPG to elaborate how London Boroughs should approach this issue, which is fundamental to delivering more inclusive neighbourhoods.

Part 5: A city for all Londoners

A fairer more equal city

London Forum **strongly supports** the need to build strong communities and enable all Londoners to actively participate in the life of the city.

The last London Plan, having identified as one of its six detailed objectives (para 1.153) and Policy 1.1 for “a city of diverse, strong, secure and accessible neighbourhoods”, failed to bring forward any more detailed policies to implement this key objective or a delivery mechanism, such as an SPG or good practice guidance, to implement this key objective. Policy 7.1: Lifetime Neighbourhoods was too narrowly conceived as a design policy for neighbourhoods for ‘lifetime housing’ and considerations around access for the less able.

London Forum **proposes** that the new London Plan should:

- embrace neighbourhoods as the building blocks on which build to create more sustainable, more accessible, more inclusive and more resilient communities;
- be presented as a key part of London’s geography, with a policy of encouraging London Boroughs to make these their building blocks for delivering greater access to the day-to-day services they need, not only to protect the facilities that they have **but** to plan for the facilities they need; and
- be supported by an SPG to elaborate how London Boroughs should approach this issue, which is fundamental to delivering more inclusive neighbourhoods.

Active citizenship

London Forum **strongly supports** the need to make the most of opportunities to bring people together in communities – support for activities such as sport but also ensuring that the facilities are available as part of a community’s social infrastructure, including local parks, children’s playspace, childcare facilities, GP surgeries, meeting places and pubs.

However, just as important, London Forum **strongly supports** measures to encourage communities and civil society groups to participate actively in community and civic life. Our member societies across London exemplify this, **but** there needs to be a real drive to secure greater opportunities for and greater commitment to securing more active citizen participation, particularly engaging young people.

Healthy city

London Forum **proposes** that a much more proactive forward planning process is needed to plan for type and location of primary health facilities. Clinical Commissioning Groups are not capable of doing more than fire-fighting as surgeries close, NHS England is more interested in acute care, London Boroughs and the new groupings seeking to transform health provision may be the vehicle, **but** they are not ready to engage with the public.

The closure and downgrading of hospitals in London, particularly of those delivering A&E functions, should be resisted until it can be demonstrated that the benefits exceed the dis-benefits.

We **welcome** the Mayor's proposal for a London Health Board, **but** fear that what is needed is something more local to deliver changes that local communities need.

A Good Public Transport Experience

London Forum **supports**:

- an affordable transport service, including protecting existing concessions such as the Freedom Pass
- measures to increase capacity and reduce overcrowding
- an ambitious new programme to make many more stations step-free

[This section of the document seems to be light on content. Presumably the TfL Business Plan will add more information, as will the Mayor's Transport Strategy]

An affordable transport service and devolution

Increase in suburban rail charges are a problem which should be addressed by devolution of train operating companies' activities to the control of the London Mayor. The statements of the current Transport Minister about avoiding the rail services falling into the hands of a Labour Mayor and his decision not to devolve them is a disgrace and seems to be politically based, rather than a decision based on the needs of London's economy and its commuters.

Safer and more secure communities

We will await the Mayor's forthcoming strategy

Participation in culture

London Forum **supports** the Mayor's aspirations for giving culture a high priority, especially making it more inclusive, promoting a London Borough of Culture and hosting major cultural festivals.

ANNEX 1:

PAPER SUBMITTED TO DEPUTY MAYORS PIPE AND MURRAY: 10/11/2016

WHAT KIND OF LONDON DO LONDONERS WANT?

Looking back in 15 years time, will Londoners be happy with how their neighbourhood/community has changed?

London, particularly Inner London, is changing fast and there is a huge amount of development in the pipeline that we have inherited from the last administration – especially some 400+ tall buildings. This is going to be a major challenge and, from a community perspective, could leave a large unwanted legacy.

Having reviewed the Mayor's "A City for all Londoners" we are very encouraged by the key messages about how we can accommodate growth.

There is a golden thread that runs through the document which is about creating a London that ordinary Londoners are comfortable with and can benefit from the changes.

Recognising the need for "good growth":

We recognise that there will be considerable growth – the real issue is how well and how sensitively we deal with these pressures. Above all, we endorse your concerns that current residents should feel comfortable with the scale of change at the local level and that the Mayor is committed to new developments that are desirable places to be.

We can increase density without sacrificing the "feel" of these places.

But accommodating rising population, economic growth and other activities in London will change our experience of the city. We want to avoid the mistakes of the past, especially of the last decade. We must ensure that we do not repeat this.

We welcome and support the principles of "Good Growth".

We recognise the need for increased densities, but these need to be used creatively to make more sustainable neighbourhoods, with more accessible and affordable housing and able to support accessible local services. Good growth needs to be designed to include improved social infrastructure.

At present much growth is not planned as part of an integrated approach to creating or maintaining sustainable communities with a wide range of accessible local services, with places and space where people come together. We must

start building and supporting accessible, walkable, sustainable and resilient neighbourhoods.

Right kind of housing:

We fully endorse the aim of delivering more, better, more affordable homes for the Londoners who need them.

The scale of the challenge is huge, **but** it needs to be carefully tailored to special circumstances of London. Building more of the right kinds of housing – housing that will meet the needs of Londoners is essential. In Inner London many large sites, which should be a real opportunity for meeting this need are wasted on housing geared to an overseas investment market. This has dictated the type and scale of the products – large, unaffordable and making no contribution to meeting objectively-assessed housing need.

Good architecture and design:

Good architecture and high-quality design is essential, **but** must be responsive to place and respect the distinct character of the different parts of the city – the “villages” and urban quarters – which give these neighbourhoods and London its character.

Higher density does not necessarily mean high-rise – so what role should tall buildings play in the future of London?

At present the London Plan appears to ask why not rather than why do we need more tall buildings. If tall buildings are not essential to achieving higher densities, proposals need to demonstrate both the need for and the appropriateness of high-rise/tall buildings. The onus of proof should be on justifying why they are the preferred solution.

We welcome the statement that tall buildings will only be permitted if they can add value to the existing community, and that they must make a positive contribution to streetscape and the skyline, as well as their local impact at street level with regard to activities and the microclimate.

We are not convinced that there is a continuing role for tall buildings in the future of London. Few make a positive contribution to the character of London – too many have been allowed which need to be assessed against a tougher set of tests to assess their appropriateness for London and their impact on the character of London’s neighbourhoods.

Inclusive Neighbourhoods:

We believe that the concept of inclusive neighbourhoods should be the basic building block for supporting London's local communities.

This is so much more than the current London Plan's "lifetime neighbourhoods" – it is not just about a better mix adaptable, lifetime housing, but an approach which embraces all the ingredients needed to support and maintain accessible, walkable, sustainable, resilient neighbourhoods.

It will mean harnessing additional density to support a wider range of local services within easy walking distance, to ensure that communities are strengthened by reinstating lost facilities, providing better access to social infrastructure (childcare, primary school, open space, GP surgery, local shops, meeting places)

The London Plan needs to embrace neighbourhoods as the building block on which build to create more sustainable, more inclusive and resilient communities. It also needs to encourage active participation of the communities themselves in shaping their own future.

Summary

We support a more planned approach to securing higher densities which also secures the benefits of such growth for the local community and is of a scale and type with which the local community feel comfortable. Good growth needs to be embraced as a "win-win" for London's neighbourhoods.

Michael Bach And Peter Eversden
London Forum of Amenity and Civic Societies

ANNEX 2: CONCLUSIONS OF THE URBAN DESIGN LONDON DENSITY SYMPOSIUM: 22 SEPTEMBER

We need to be clear about what we want our city to be like and then develop the policies to help achieve this.

A difficult proposition, especially within the envelope of a housing target-led planning system, but robust policies that explain what will, and will not be acceptable in terms of form and quality would help.

- ***Should density be an input to, or output from, planning, or maybe both? In other words should particular site densities be created by meeting other planning requirements or should they be the starting point for any proposal.***

The density matrix should be used for establishing the capacity of housing sites **and** for establishing the appropriate density range for a site

- ***Residents like, or dislike, a place because of its design and intrinsic characteristics, not because of its density. Places that give people the opportunity to live well both inside and outside the home, which provide good access to a range of interesting things to do and space conducive to enjoying the company of neighbours, are most successful. In London, we need to improve how we deliver these characteristics at higher densities.***

The higher the density the less the design freedom to produce the kind of places that people like.

- ***New ways of understanding and mapping places should be used to enrich our density policies. This should include understanding of local movement patterns and barriers, jobs and land uses and the position and capacity of a range of services and infrastructure, not just public transport.***

There is a need to refine how accessibility is mapped

- ***Can one density matrix be both a strategic planning tool, and support the determination of individual planning applications? By combining the roles it may not be providing the best tool for either.***

Yes

- ***The existing density policy is used and useful but has limitations, and the way it is applied was questioned. It is seen as a useful***

element of SHLAAs, site appraisals and negotiations, but around half of permissions are granted for schemes outside its ranges, which greatly dilutes its effectiveness.

This not the fault of the matrix but the way the policy is applied. The matrix provides a broad “appropriate range” for any site based on its “context” and public transport accessibility (and public transport capacity). The London Plan is clear that exceeding the upper limit of the range needs to be robustly justified and that the key performance indicator (KPI) for the policy is that 95% of developments should be within the appropriate density range. This is not a failure of the policy but a failure to apply it.