

Towards a new London Plan



A response to the Mayor's *A City for All Londoners* document
from Sian Berry AM on behalf of the Green Group in the London Assembly
December 2016

Towards a new London Plan

London could not be at a more critical moment for making a new spatial plan. Housing costs are creating existential problems for the city. People on low incomes and those on average salaries in key public sector professions are now struggling to live here at all. With a strong evidence base that housing affordability is in crisis, the new London Plan needs to make fundamental policy changes that will affect whether our city can function in the future.



The global crisis of climate change has never been more crucial either. With the Paris Agreement now ratified and clear goals in place, the London Plan must provide the practical framework needed for action to secure, not just our city, but a habitable wider world for future generations. To achieve this, the plans London puts in place up to 2025 are the most critical and the Mayor needs to ensure we 'frontload' our plans and don't leave any loose ends for the next Mayor.

Problems on our transport network are made worse by the housing crisis and a growing daytime population of workers who live outside our city. Integrated planning, housing and transport policies are needed more than ever from this London plan. We need to plan the new homes we require in concert with new transport, workplaces and new services, so that the need to travel is reduced and so that the lowest impact ways to travel are put first in both spatial planning and investment choices. This new plan offers the Mayor a chance to remove the counterproductive traffic-inducing road-building projects of the past and make better choices for how we invest.

On the economy, culture and social cohesion too, London has to build resilience. Small and medium-sized businesses, our remaining industry and our emerging heritage all call out for support and protection from our new planning policies.

This document responds to the publication in October 2016 of the Mayor's vision, *A City for All Londoners*. More detailed comments will be needed when each of the Mayor's proposed strategy documents and the new London Plan itself are published.

These ten chapters represent my views on behalf of the Green Group of Assembly Members, and contain key policy ideas that I believe will make the most difference to improve Londoners' daily lives and secure a better city for all our citizens in the future.

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The London Plan must be consistent with the policies set out by the Government in the National Planning Policy Framework.¹ The ideas in this document can all be justified with reference to this framework and its goals.

Where evidence is needed to support a stronger or more innovative policy in London, this document indicates where this should be sought, and which Londoners, organisations and community groups may be able to provide information and advice.

1. Create an inclusive process for developing the plan

I recently asked the Mayor to ensure that all Londoners were able to play a meaningful part in developing the next London Plan,² and wrote to the Mayor in December 2016 with the following requests:³

For community events that help develop the plan to be held in public, with webcasts and transcripts produced, and for these to involve a full range of participatory activities – workshops, conferences, technical seminars, sounding boards – aimed at listening to the views of community groups and citizens.

That accessible formats are provided for all consultation materials, including accessible webpages, e-books, audio versions of pdfs, and an Easy Read summary of all major documents published.

That the Mayor should set up a continuous liaison process for community groups, such as a sounding board, to ensure that community groups have a direct line into the process for feedback and comments, which are responded to and acted upon.

For the Mayor to write a Statement of Community Involvement. Although not required by legislation, the process of developing the London Plan would benefit hugely from such a document from City Hall, published early in the process and used to set out and guide community involvement throughout.

The community organisation, Just Space, has produced a document *Towards a Community-Led Plan for London* which sets out principles they have developed with Londoners. Their advice should be followed.⁴

Supported by the NPPF:	69 – “create a shared vision with communities”, “Involve all sections of the community in the development of the plan and in planning decisions.” 155 – “early and meaningful engagement and collaboration.”
Sources of further evidence:	Evaluation of previous London Plan processes has been done by Just Space.

2. Assess the social impact of planning decisions

In a dense, interdependent and highly unequal city like London, the social impact of a development should be given as much weight in planning decisions as its economic or environmental impact. This can be hard to assess, but great strides have been made in evaluating social impacts of policies in recent years.

A City for All Londoners sets out high-level goals to tackle inequality and increase social integration but does not yet say how assessing these impacts will be included in planning policy.

A duty to assess the social value of investment is now applied to those commissioning public services. The Public Services (Social Value) Act 2013 ensures that value for money calculations in public services also assess how investment secures wider social, economic and environmental benefits.⁵

The next London Plan is the right place to embed these standards in London’s planning. For large developments, a detailed analysis of the social impact on people in the local area and the wider city should be produced using a methodology defined by supplementary guidance. This should include the impact on public health.

Like viability assessments under the proposed new guidance from the Mayor, these assessments should be scrutinised and amended by experts, independently of the developer, and published in full to ensure transparency.

This evaluation should be available at the earliest possible stage of public consultation, produced for different options where these are being presented to the public, and be part of evaluating the costs and benefits of proposals in final funding and planning decisions.

Supported by the NPPF:	7 – the three dimensions of sustainable development. 8 – “economic, social and environmental gains should be sought jointly and simultaneously through the planning system.” 192 – requiring supporting information that is “relevant, necessary and material.”
Sources of further evidence:	Just Space’s document <i>Towards a Community-Led Plan for London</i> outlines a suitable process for social impact assessment. ⁶

Evidence for the social harm of recent developments should be sought and learned from. One example is the displacement of residents of the former Heygate estate in Southwark, conducted by Professor Loretta Lees of Leicester university.⁷

3. Ensure we build the housing Londoners need and can afford

3.1 Housing Londoners can afford – no compromise on providing what we need

The crisis in London’s housing is as much one of real affordability as it is of supply. The Mayor can look to cities such as Berlin and Copenhagen to see effective policies that could help dampen the speculation on London homes that has done so much to reduce the ability of Londoners to afford to live here.



With more transparency from developers, stronger policy expectations for the provision of truly affordable homes (which persist beyond a single sale), support for new community-led forms of housing and better protection for the social rented homes we already have, the next London Plan is able to pull a range of levers. Done right, these will combine to achieve real change in the policy landscape for building new homes and an effective nudge to the wider housing market in our city.

A City for All Londoners notes the need to increase supply of homes: “both for sale and for rent, including a range of different sorts of affordable housing. For people on low incomes, we need more low-cost rented homes.” However, recent documentation from the Mayor sets a low bar for the various kinds of ‘affordable’ homes (including shared ownership, which is a highly unsatisfactory solution) in private developments. It does not set clear targets and does not ensure that London Living Rent homes will be available for the long term. All new GLA-funded homes falling under his Rent to Buy scheme will come with a time limit of three to ten years for conversion to shared ownership.

The new London Plan must rectify these failings with new policies to achieve more homes at social and living rents within new developments.

Stand by the Mayor’s 50 per cent target

There is no reason why 50 per cent truly affordable homes in private developments, without public funding, should not be a realistic goal of policies under a new London Plan.

We support many of the measures in the proposed new Supplementary Planning Guidance (SPG) on housing – in particular those around transparency and the improved methodology for viability assessments.

However, the London Plan must increase the 35 per cent 'affordable' housing threshold in the current SPG and define this concept better, based on evidence of the need for more homes within the means of average Londoners and drawing upon results of viability assessments conducted under its new methodology. It is concerning that, under the new SPG, secrecy will be maintained for developments exceeding 35 per cent, as this may serve to hide important evidence that will show more is possible.

The NPPF requires flexibility and attention to be given to viability, but this should work both ways in policy for London. If a viability assessment shows that more than 50 per cent truly affordable housing is viable then that should be required. Where a developer has already owned the existing building or land for a number of years, as is common in the public sector and with many housing association sites, land values cannot be regarded as a cost to the project and should not be counted as part of viability, enabling a higher than 50 per cent contribution to be sought if the site is redeveloped.

No lower limit

Many boroughs currently start to require 'affordable' housing only for developments of 10 or more homes, which can incentivise artificially low numbers of homes on suitable sites. There should be no lower limit to contributions expected from developers to truly affordable housing. Preference for on-site provision should begin at a suitable level, but even small developments should be expected to make some financial contribution to this provision.

Protect existing social housing

Development that removes homes at social levels of rent should not be allowed if it does not replace these homes like for like. Replacements should be let at truly social rents and on the same terms and leases to existing residents who must be able to return.

Prohibit 'Buy-to-Leave' for new builds

On the growing tendency for second homes and 'buy to leave' purchases in new developments, the new London Plan should require developers to apply lease conditions to the homes they build which make sure these are the primary residence of the new owners.

The need for new housing for Londoners is the basis of housing targets, and homes that are not lived in or used only infrequently do not contribute towards these goals, so a condition that newly-built homes should be lived in is justifiable. Those wishing to buy a second home in London will not be prohibited from buying older stock under this planning policy, but it will help to prevent waste in new housing supply from pure speculation.



Ensure new 'Buy to Let' homes are rented at a London Living Rent

Planning conditions should also be placed on new private homes so that, if they are rented out privately, the rents charged are at or below the London Living Rent for that area. This form of rent control on new developments has the potential to be an effective nudge to the housing

market. It would apply only to new homes but will help ensure an additional supply of lower cost rented homes where homeowners have to move away temporarily, and discourage pure 'Buy to Let' investors from crowding out Londoners from the private sale market.

Ensure homes at a London Living Rent are permanent

Planning policy should ensure that homes at both social rents and the London Living Rent make up the affordable housing component of private developments so that the term 'affordable' is meaningful and so that homes within Londoner's means remain available. Where possible, and without subsidy, covenants should be sought to ensure the permanent availability of London Living Rent homes, without them being part of the Mayor's rent to buy scheme or subject to the right to buy.

Ensure social lettings are at social rents

Homes built as social rented homes should be subject to the national rent regime, as defined in the glossary of the NPPF. The implementation plan for the London Plan should ensure that resources are available so that the enforcement of social rents in planning agreements is carried out effectively.

Make provision for key workers

More than half of emergency 'blue light' workers in London are now unable to live within the city. Resilience and preparedness for emergencies means that the London Plan must include specific policies and a clear strategy to ensure homes earmarked for (and genuinely affordable to) key workers are built. This was a key recommendation of the Harris Review into London's preparedness for attacks and emergencies.⁸

Provide support for community-led housing models

Both planning policy support and practical help for community-led housing models, including co-ops, co-housing and community land trusts, are needed. Planning policies should set out how weight should be given to the social and community benefit of such homes when making decisions. An assessment of the potential demand for these homes among Londoners should be carried out, and the right level of practical support for putting together proposals, finding land and negotiating the planning system should be part of implementation plans.

Define and apply a living rent for students in London

Students are a very important group of London's citizens, and it's disappointing that *A City for All Londoners* doesn't mention how their needs will be supported, especially as student rents are rising far beyond what can be paid with even the maximum financial support available. A Student Living Rent should be defined by the Mayor, based on the average income of students in London, including a reasonable amount of paid work on top of loans. A high proportion of homes at or below this rent should be required from developers of student housing.

Make better use of Compulsory Purchase Orders for empty homes

The London Plan should set out a clear set of conditions for when councils and the GLA will use CPO powers for empty homes in order to provide new social and living rent homes.

Supported by the NPPF:

47 – meeting housing needs.

50 – "sustainable, inclusive and mixed communities", "the needs of different groups (such as... people wishing to built their own

homes)”.
51 – preventing empty homes and CPOs.

Justification for planning conditions, paragraphs 203-206 –

“Where obligations are being sought or revised, local planning authorities should take account of changes in market conditions over time and, wherever appropriate, be sufficiently flexible to prevent planned development being stalled”, “Planning conditions should only be imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects.”

207 – enforcement of planning agreements.

Sources of further evidence: We urge the widest possible search for evidence among different groups affected by these policies, in particular private renters, students, older people, groups monitoring social rents, and those seeking to create community-led homes.

Islington Council’s supplementary planning document on ‘preventing wasted housing supply’ is a good example of a policy intended to prevent ‘buy to leave’ in new developments.

3.2 Public participation principles for new housing developments

The Mayor’s new guidance for the process of estate regeneration will only be applied initially to developments with an element of public funding. The London Plan is an opportunity to give such principles full weight and ensure they are applied to all new housing on larger sites, and especially where existing homes are proposed to be demolished.



A consultation draft of new guidance from the Mayor was published in December 2016. So far this does not follow these principles, which were set out in a letter I sent to the Deputy Mayor for Housing in September 2016:⁹

- No residents excluded from involvement in making plans for the area.
- Full transparency for information on the current state of estates and the basis for new plans.
- Early and wide engagement with residents, when the goals of the regeneration are still open to change.
- Expert support for residents to develop their own plans for their areas.
- A meaningful final say and real decision-making power over the final options, ideally with a ballot for all residents.

I will be responding in more detail to the proposed draft, and recommend that much more detail is given in the final documents, as many of its terms and provisions are also too vague. The Government’s own suite of guidance documents as part of its estates strategy is much

more comprehensive and clear and, although it does not include support for residents' own plans, is a much better start than what the Mayor has published so far.¹⁰

Set a lower bar for 'large' developments

The current London Plan policy 3.7 B says:

B Those on sites of over five hectares or capable of accommodating more than 500 dwellings should be progressed through an appropriately plan-led process to encourage higher densities and coordinate where necessary provision of social, environmental and other infrastructure and create neighbourhoods with a distinctive character, sense of local pride and civic identity in line with Chapter 7. The planning of these areas should take place with the engagement of local communities and other stakeholders.

The new London Plan should refine this definition in a way that includes all types of council and housing association estates, as well as undeveloped sites that could make a significant contribution to the local community if new guidance on working with residents were followed. Supplementary guidance should be applied to all such sites.

Supported by the NPPF:

69 – “include all sections of the community in the development of local plans and planning decisions” (my emphasis)

188 – early engagement

The legal basis for consultation with tenants and leaseholders comes from section 105 of the Housing Act 1985 - Consultation on matters of housing management. However the processes set out for Local Development Plans and Neighbourhood Plans should also be consulted as a model for engaging local communities in a more thorough way.

Sources of further evidence:

The development of these policies should include effective public participation from a wide and diverse range of Londoners. Again I suggest working with Just Space and its network to develop these ideas in a collaborative way.

3.3 Support for community and neighbourhood planning

The new London Plan is a chance to increase the weight given to policies produced by local communities in Neighbourhood Plans, and to encourage more communities and a more diverse range of Londoners to participate in these processes.

Policies should be clear that weight will be given to preferences expressed by local communities and that developments that fit with the vision set out in a Neighbourhood Plan will be supported by the Mayor, while proposals that ignore the wishes of local communities when written into their plans will be considered unfavourably when other planning issues are equal.

The plan should also encourage the use of Neighbourhood Development Orders and Community Right to Build Orders by communities as a positive way of speeding up developments that fit with the vision of local residents.

As also stated in section 7 of this document on the economy, the new London Plan should add weight to protections given by Asset of Community Value status, and set out strict conditions under which developments can change the use of land or buildings from what the community has sought to protect with these listings.

Supported by the NPPF:	183-185 – Neighbourhood plans 198 – Neighbourhood Development Orders 201-202 – Neighbourhood Development Orders and Community Right to Build Orders
Sources of further evidence:	We recommend any responses to <i>A City for All Londoners</i> received from London’s Neighbourhood Forums are given a high level of consideration. The Just Space document <i>Towards a Community-Led London Plan</i> is also a good source of evidence for stronger neighbourhood support.

3.4 A presumption against demolition

The Mayor’s manifesto says “demolition is only permitted where it does not result in a loss of social housing, or where other all options have been exhausted, with full rights to return for displaced tenants and a fair deal for leaseholders.” However, there is not yet any mention of new policies on demolition in *A City for All Londoners*.

Demolishing existing homes and buildings has a wide range of negative impacts and too often demolition is chosen for weak or marginal economic reasons, not because the existing buildings are beyond repair.

Demolition projects – as compared with refurbishment – have a huge impact in terms of materials used and their impact on carbon emissions (through ‘embodied carbon’) but they also have other impacts that are also not taken into consideration in individual planning decisions, except by asking for reasonable mitigation.

However, combined, these additional impacts of demolition provide a strong strategic basis for a much stronger policy against demolition in the new London Plan. They include:

- Extra construction traffic and construction impacts, including noise and air pollution, caused by the demolition and rebuilding process.
- Loss of heritage value, and ‘sense of place’ due to the existing architectural form and merit of many older buildings, including most residential estates and many buildings now in a state of dereliction.
- In the case of homes in residential blocks and estates, the social impact of the decanting and temporary rehousing of existing residents, especially if not all of them can return at the end of the process.
- The potential permanent loss of social cohesion, and a reduction in health and wellbeing due to the demolition and replacement of existing communities.

The current London Plan does not caution against demolition, or include any consideration of embodied carbon, but there is a basis in the NPPF for this and some boroughs have already introduced policies that do seek to ensure alternatives are explored.¹¹

I have written to the Deputy Mayor for Housing asking for new guidance on existing policies and for stronger policies against demolition in the new London Plan, including adding the embodied carbon of buildings demolished as part of development to the impacts considered in current policies 5.2 and 5.3B.

New policies should include clarification of the Mayor's energy hierarchy and require an energy impact assessment that considers the carbon emissions of a development, including:

A cost-benefit analysis of the embodied carbon in any buildings that are to be replaced and the carbon cost of a new construction should be calculated.

A comparison of up-front carbon emissions with those saved from future energy costs, should be reported and assessed as part of the planning decision. This will calculate a more accurate 'return on investment' and show the time lag before savings begin.

In cases where a development site has existing buildings, these calculations should not only be compared with a 'do nothing' scenario. A plausible refurbishment alternative should be presented and cost-benefit calculations completed for this scenario.

The social impact of any such plans should also be considered via a new Social Impact Assessment, as described in section 2.

To help prevent demolition in future and encourage the design of adaptable buildings, policies should mandate that new homes should be built to last a minimum of 125 years. They should wherever possible be designed for simple maintenance (for example to allow the replacement of the heating system) and adaptable layouts so that retrofit and re-arrangement of internal spaces can occur when the needs of residents and the local area change.

Supported by the NPPF:

17 – Core Planning Principles: "encourage the reuse of existing resources, including conversion of existing buildings."

The Greater London Authority Act gives the Mayor of London a statutory duty to contribute towards a significant reduction in climate change emissions.

Sources of further evidence:

The Institution of Civil Engineers has many resources on how to measure embodied carbon, for example:
<https://www.ice.org.uk/disciplines-and-resources/briefing-sheet/embodied-energy-and-carbon>

Other sources of expertise include WRAP and the Green Buildings Council.

One example of a successful retention and retrofit project is Catlemaine Tower on the St Johns Grove estate (LB Wandsworth).

4. Support better ways to travel and access the services Londoners need

4.1 Set a clear goal for development to reduce traffic

In July 2016 Caroline Russell AM wrote to the Mayor with a list of transport experts who could help advise him on effective ways to reduce traffic in London.¹² The Mayor wrote back saying “I look forward to working with you to reduce traffic across London”. This is a positive response and must be reflected in the new London Plan.



A City for All Londoners says the London Plan will aim for “Intensifying development around well-connected transport nodes,” and talks about modal shift but doesn’t specifically say the Mayor will aim for reduced traffic over time. The new draft Transport for London business plan similarly aims for a shift in percentage terms between modes, alongside rising numbers of journeys, but estimates that the number of trips by car will not reduce but remain constant up to 2021.

This won’t be enough: plans to shift road space from private motor vehicles to prioritise cycling, walking and public transport will cause increased congestion if the goal of development policies, as well as transport policies, are not clearly to reduce the need to travel and cut levels of motor traffic overall. Reducing the number of vehicles on the streets will also help to cut particulate matter in the air and support the Mayor’s clean air plans.

Trips by light goods vehicles and vans are increasing, and this phenomenon needs to be further studied. Policies aimed at reducing these trips should be included in the London Plan, for example requirements for freight, waste and recycling consolidation plans, delivery consolidation for retail developments, and support for zero-emission ‘last mile’ deliveries to homes and businesses.

Supported by the NPPF:

17 – Core planning principles say make “fullest possible use of public transport, walking and cycling.”

29 – recognises that urban areas can set their own priorities for sustainable transport.

34 – concerns minimising the need to travel.

37 – “minimising journey lengths for employment, shopping, leisure, education and other activities.”

Sources of further evidence:

The Government’s former Planning Policy Guidance note 13, is a useful guide to effective policies that reduce the need to travel – and see section 4.3 of this document.

Careful study should be made of the long-term trend for reducing car use and car ownership in London, in particular by Londoners themselves. It is important that the rise in light goods vehicles is

better understood. Both small and large businesses, as well as logistics companies, should be contacted as a potentially valuable source of data, now that tracking of commercial vehicle movements via GPS is commonplace.

4.2 Car-free new housing throughout London

With Londoners voluntarily reducing their levels of car ownership for many years, any policies for new developments should include zero car parking levels except for people with disabilities that mean a car is required. This would not be a draconian move. In any area where car-free development is planned, existing homes with parking spaces and/or access to on-street parking will still exist and be available to other people who believe a car is essential.

Stop using PTALs to measure accessibility

Current parking policies in the London Plan are less than ideal – they allow for up to two parking spaces per dwelling, and even more in areas with ‘low PTAL’ (Public Transport Accessibility Level) assessments for the locality of a new development.¹³

The methodology that calculates PTALs dates back to 1992, and Transport for London itself admits that it takes no account of:¹⁴

- The speed or utility of accessible services
- Crowding, including the ability to board services
- Ease of interchange (including, for example, the availability of services from a rail or tube station that is a short bus ride away)

The method also has arbitrary cut-offs in terms of distance from public transport stations and stops, beyond which no provision is assumed. For buses, this cut-off is 640 metres, and for rail, underground and light rail services, anything beyond a distance of 960 metres is ignored. In reality, people in London are prepared to walk small additional distances to reach good tube, train and bus services.

In contrast, ATOS (Access to Opportunities and Services) assessments do take account of what is at the end of journeys, take account of good walking and cycling provision and provide for a better assessment of whether measures to provide more local services or improvements to public transport might be needed in an area.

Boroughs such as Camden have found that using a combination of PTAL and ATOS measurements provides a strong case for access to services and transport being good throughout the borough, and this has enabled them to make the case for car-free housing in all new developments.¹⁵ It is recommended for this London Plan that PTAL assessments are no longer used to assess developments for parking purposes at all, but that ATOS is used instead.

Where accessibility levels are low in an area, the first consideration in planning decisions should be to ask for contributions from developers to help improve accessibility by foot, bike and public transport to acceptable levels. Only in the very rare cases where this is objectively

impossible should deviation from zero parking standards be accepted. Strategic planning should ensure that transport and homes are planned together – see section 4.3.

Supported by the NPPF:	39 – says parking standards should take account of accessibility but not what measure should be used.
Sources of further evidence:	Camden’s evidence incorporating ATOS and PTAL levels accompanies the borough’s new draft Local Plan. Robust evidence for the link between car parking and induced driving levels of residents is available. Developers have attempted to show this link isn’t strong, but their evidence has been shown to be selective.

Bring in higher bike parking standards

In most boroughs the level of cycle parking required is low – one secure cycle parking space for smaller homes and no more than two even for large houses. With households consisting on average of two or more people, this is not adequate and may lead to many Londoners being put off owning a bike if it has to be stored insecurely in the street.

Levels of bike parking required in the new London Plan should be reviewed to take better account of household sizes and the Mayor’s future plans for cycle use, not just current levels.

Forward-looking levels of secure bike parking should be included in all types of homes, including those intended for older people for whom cycling can be a lower impact form of exercise than walking. A higher level of bike parking still should be required for homes aimed at students.

All developments should have suitable visitor bike parking provided, to help with policies to increase deliveries by bike, and sustainable travel by public servants who visit homes, such as nurses, social workers and police officers.

Bike parking improvements should also be sought when homes are refurbished or extended. If constraints within existing developments make it impossible to provide this on site, contributions to secure on-street bike parking should be required, such as bike hangars..

Supported by the NPPF:	30 – facilitating the use of sustainable modes of transport. 35 – priority for pedestrian and cycle movements. 40 – “local authorities should seek to improve the quality of parking in town centres” – this does not specify it should be for cars.
Sources of further evidence:	Evidence on current bike ownership levels and the relationship with having secure parking available should be gathered.

4.3 Integrate transport and planning

Too often homes are built in areas where transport by sustainable methods is not easy, without timely investment in changing this. The Thames Gateway is still the major new development area for homes in London and much of this is poorly served by public transport, with existing residents very car dependent. Rather than focus on new roads and road-based river crossings for this area and other major development areas in London, we must do a better job in this London Plan at fully integrating planning with reducing the need to travel and sustainable transport.

A 'Masterplanning Checklist' was published by Campaign for Better Transport in 2008, aimed at the Thames Gateway area.¹⁶ Its principles provide a useful summary and a clear direction for how to integrate housing with local services and jobs to minimise the need to travel.

It proposes a high-level goal for new housing to be, on average, significantly less car dependent than current housing stock in an area, and sets out a number of detailed policies to achieve this.

On transport, the checklist recommends – among other things – segregating parking from residential homes, filtered permeability by default, minimum distances and direct routes by foot and cycle to transport links, planning public transport routes into street layouts, and residential travel plans in which public transport services and smart travel planning information are provided as the first residents move in, not after car-dependency develops.

Supported by the NPPF:

30 – facilitating the use of sustainable modes of transport
35 – priority for pedestrian and cycle movements.

Sources of further evidence:

The Masterplanning Checklist was written by Transport for Quality of Life for Campaign for Better Transport and London Councils in 2008. Since then, Campaign for Better Transport has also produced further reports on reducing car-dependency through planning, including one focused on Outer London. See under 'planning' here: www.bettertransport.org.uk/research

4.4 Fully implement healthy streets principles

Planning policies have a huge influence on the ability to live a healthy life, including access to green and open spaces, community activities and support, a range of good food and local shops, low air and noise pollution, and especially through active travel. The new London Plan represents a chance to look again at how new developments can help make streets healthier and put walking and cycling first.

An integrated 'Healthy Streets' approach to planning should be the starting point for the Mayor's local transport policies within the London Plan. New developments can support healthy streets not just by building them from scratch but also by contributing to improvements in their local area.¹⁷

A whole street approach – ten indicators of a healthy street, from TfL:

Indicator	How it relates to health
Pedestrians from all walks of life	Everybody needs to be active every day. If the mix of people walking in the street does not include certain groups such as children, older people or those with disabilities then the street environment is excluding some people from staying active.
People choose to walk and cycle	Some people walk or cycle not out of choice but due to poor access by other modes of transport. This can have negative impacts on their health and wellbeing. Success should be measured by people choosing to walk and cycle, rather than levels of walking and cycling.
Clean air	The health impacts of air quality include cardiovascular disease and respiratory disease.
People feel safe	People need to feel that they will be safe from injury and crime when they are on the street.
Not too noisy	Noise has a range of health impacts including stress and high blood pressure. It also discourages people from walking and cycling.
Easy to cross	If streets are difficult to cross because of physical barriers or traffic, people will be discouraged from using the street, particularly on foot. This can be socially as well as physically restricting.
Shade and shelter	Some people have difficulty moderating their body temperature, and this can put their health at risk in hot weather. Shade is needed on streets to enable people to keep cool.
Places to stop	Many people can only walk short distances without taking a rest, particularly those who are older, young, pregnant, injured or who have a disability or health condition such as chronic obstructive pulmonary disease. Providing seating at regular intervals is necessary to enable these people to incorporate much needed physical activity into their daily routine.
Things to see and do	Street environments need to be stimulating and engaging to invite people to walk and cycle more. This highlights the importance of good urban design and maintenance of public spaces in delivering health benefits.
People feel relaxed	Walking or cycling in the street should not be a stressful experience. If people are not relaxed it indicates that issues such as noise, insufficient space or fear of danger have not been addressed.

The current London Plan has a number of policies that support these principles and these must not be weakened or lost.

- Street design that maximises the potential for social interaction, proposals that allow people with mobility problems or a disability to access buildings and places (policies 7.1, 7.2 and 7.5, and the SPG on accessibility).
- A range of play spaces for children and young people (policies 3.6, and the SPG on play space, including standards).
- Proposals for new streets minimise the impact of noise caused by traffic and commercial uses through insulation, site layout and landscaping (policy 7.15)
- Traffic management and calming measures and safe and well-lit pedestrian and cycle crossings and routes (policies 6.9 and 6.10)

New policies should ensure that when public spaces are designed, walking desire lines are catered for, and that walking connectivity is prioritised.

In addition, contributions via Section 106 agreements and other planning conditions should be required for local improvements to healthy street infrastructure, including:

- Places to sit
- Shade trees and refuges from rain
- On-street cycle parking

- Ensuring loading arrangements for new shops do not interfere with the delivery of these principles or reduce the utility and safety of streets for pedestrians, in particular restrictions on large lorry deliveries to smaller supermarket branches and new retail facilities in residential areas.

4.5 Lifetime neighbourhoods

Lifetime neighbourhoods principles are a set of standards aimed at ensuring local areas are welcoming and accessible to older people – for example through green space, digital inclusion facilities and ensuring services are located within communities.¹⁸ These principles should be integrated within Healthy Streets policies as well as wider London Plan policies for protecting community services and promoting digital infrastructure.

4.6 Involve people in street improvements

Where a developer is creating new public spaces or redeveloping an existing public space or street as part of a scheme, local people should be fully involved in developing the plans, with a similar process of involvement to that developed for housing estates.

This will help make sure streets work for people in the area, establish any heritage (or emerging heritage) features people want to retain, make sure any changes to bus routes and stops are suitable, and help to ensure new spaces are used as intended once built.

In November 2016, Caroline Russell AM published ‘Prioritising People’ with a five point plan for supporting healthy streets in London. The implementation plan for the London Plan should reflect its recommendations for involving the public in building healthy streets, piloting new layouts and changing decision-making models and data collection¹⁹

Supported by the NPPF:	<p>30 – facilitating the use of sustainable modes of transport.</p> <p>35 – priority for pedestrian and cycle movements.</p> <p>58 – “create safe and accessible environments.”</p> <p>69 – “achieve places which provide opportunities for meeting”, “high quality public space, which achieves the active and continual use of public areas.”</p>
Sources of further evidence:	<p>Transport for London’s Transport Action Plan for health is a highly practical guide to healthy streets, much of which can be supported by planning policies and requirements. Their public health experts should be brought in to the process of drafting the London Plan.</p>

5. Tackle climate change and save energy for a resilient city

The drafting of this London Plan comes as we are running out of time to tackle climate change. The C40 organisation’s most recent report sets out a roadmap for its member cities to help deliver the Paris Agreement objective of limiting global temperature rise to 1.5 degrees. It is clear that a huge step up in action is required during the critical period from now to 2020.²⁰

We cannot afford any further delays in the development and delivery of carbon-cutting programmes during the Mayor’s term of office. Our plans need to be ‘frontloaded’, with nothing left for the next Mayor to deal with.

Policies on transport and clean air will also contribute but carbon reductions can’t be achieved without the strongest energy policies London has ever seen from this Mayor.

5.1 Stronger climate change commitments

In London, our 2015 carbon targets have not been met and we risk falling further behind. The Mayor’s commitment in *A City for All Londoners* is to: “set out a detailed roadmap for reducing carbon, with the ultimate ambition of London becoming a zero-carbon city by 2050”. However, the most important target is what we will achieve much earlier – by 2025 – and the GLA’s longstanding target of a 60 per cent reduction by this year must be reset in the wake of the Paris Agreement to reflect what is needed.

5.2 Maintain zero carbon homes rules for London

A City for All Londoners says “Throughout the London Plan, I will ensure new homes built in London are zero carbon, and I will develop new and innovative approaches to energy efficiency, starting with an early trial of new-zero-energy retrofitting of homes.”

We support the Mayor’s resolve to maintain these requirements, which are vital if we are to become a zero carbon city by 2050, and fully support the emphasis on retrofitting. This will require clear, enabling guidance on the appearance of external solutions to energy efficiency in solid wall homes, which can be controversial locally.

Policies and guidance should aim for the achievement of zero carbon standards to be done within the fabric and operation of the buildings themselves, with incentives given to avoid offsite ‘offsetting’, ideally with a higher requirement than that needed simply to reach the standard for any offsite provision.

With homes responsible for a large proportion of air pollution emissions, any solutions to reduce carbon should also support clean air policies.

Supported by the NPPF:

95 – policies on supporting energy efficiency improvements and zero carbon homes policies.

Sources of further evidence:

The Zero Carbon Hub was established as a technical advisory body and should be closely involved in developing these policies.
www.zerocarbonhub.org

The Centre for Alternative Technology is another good source of information on innovation, particularly in retrofitting.
www.cat.org.uk

5.3 Maximise solar and green roof requirements

London has the lowest uptake of solar panels of any region in mainland Britain, despite it being now one of the cheapest and lowest maintenance sources of renewable and zero-emission energy. Solar photovoltaic power (Solar PV) could meet a fifth of Londoner's electricity needs, but people in the North of England and Scotland are both installing more solar capacity than us.²¹ This needs to change.

A coalition of green charities and organisations recently showed that a city-wide solar strategy could save up to 3.6 MT of carbon dioxide by 2031, and create two gigawatts of added generating capacity.²²

The Mayor's manifesto promised a solar energy strategy, and this and the London Plan should put in place strong policies for the highest deployment scenarios possible, seeking to remove some of the additional barriers that exist for the use of solar power in London within the planning system.

New buildings

For new developments, the London Plan should require all new roof spaces to accommodate either renewable energy or green infrastructure. Since the policy would be applied almost always to new buildings where designs can easily be adapted to hold such rooftop installations, it is reasonable to do this without exception.

In March 2015, France passed legislation that requires all new commercial buildings be built with either solar panels or rooftop gardens. Toronto, Canada adopted a similar law in 2009, although this covered both commercial and residential buildings, and in Switzerland, all buildings with a 'suitable pitch' are required to have a green roof.

Small and community installations - conservation areas

There are over a thousand conservation areas across London, whose statements and policies can serve to prevent solar installations with any visibility at all, in an effort to maintain the character of local areas. This is an admirable goal, but fails to recognise the non-structural nature of most solar installations (ie it does not cause permanent damage and can be removed if and when better options are available) and the large number of other modern aspects to streetscapes – large numbers of cars parked in conservation area streets is just one example.

The national planning restrictions relating to the deployment of solar panels in conservation areas have been somewhat relaxed, allowing for solar PV panels to be fitted on roof slopes, providing they are not on the wall fronting the highway, or where local councils have applied tighter restrictions.

The aim of the next London Plan should be to strengthen local support for planning applications for solar installations on existing roofs, especially on buildings that serve a



community purpose such as schools, community centres and churches. This approach is backed up by the NPPF in paragraphs 131 to 134 – see box.

Policies should be clear in allowing for some visibility of solar panels installed on heritage buildings and in conservation areas when certain conditions are met: for example that alternative suitable roof spaces are not available. They should also be designed as far as possible to fit in with the character of the area, ideally following the guidance recently published by the Campaign to Protect Rural England and Building Research Establishment in association with Solar Trade Association.²³

Medium and large scale deployment

The potential for medium and large scale solar power in London is clear: when the main Olympic Stadium car park installed a 360kW solar roof, this was greater than the entire PV capacity currently installed across Transport for London's (TfL) estate (250kW).²⁴

Medium and large scale deployment of solar panels is ideal for the underused and empty roof tops of London's commercial and industrial businesses, supermarkets, car parks, transport and public buildings and other spaces. The London Plan should contain clear and specific requirements for new and refurbished buildings of this type.

Deployment of solar panels in the Green Belt remains controversial. However, the NPPF allows for this, when the wider environmental benefits are taken into account, saying:

91. When located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development. In such cases developers will need to demonstrate very special circumstances if projects are to proceed. Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources.

The potential of large scale deployment on solar farms to boost London's generating capacity is huge. For instance, a proposal on a farm in the London borough of Enfield (Sloemans Farm in 2014) for a 15MW solar farm was the equivalent of 4,000 house solar PV installations. Had this application gone ahead, London's entire solar electricity generating capacity would have been boosted by a third.²⁵

The London Plan needs to support large scale solar deployment as part of multi-functional land use. Lower grade farmland and marginal land in the Green Belt offer opportunities to help secure London's energy security, to yield both economic and ecological benefits. Planning conditions need to ensure they boost biodiversity, support small livestock and provide certainty against long-term damage, so that the sites can be returned back to their original use, following good practice laid out by professional bodies.²⁶

Supported by the NPPF:

65 – sustainable infrastructure should not be refused if “mitigated by good design” or if a heritage asset doesn't “cause material harm to the asset or its setting which is not outweighed by the proposal's economic, social and environmental benefits.”

97 – increasing supply of renewable energy, including supporting community-led initiatives.

131, 132, and 134 – these all support the installation of solar

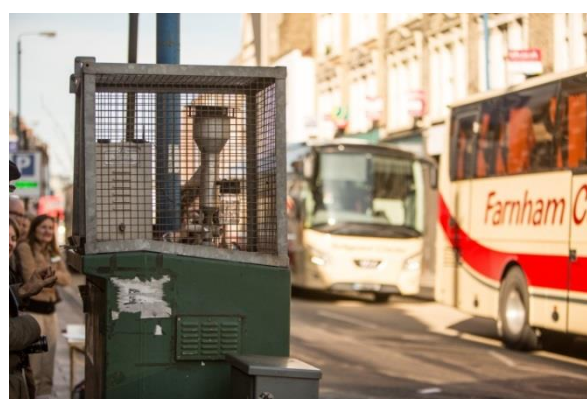
panels on buildings with a social purpose that will support their viability.

134 – advises that where the harm to a designated heritage asset is less than substantial “this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.”

Sources of further evidence: The Solar Trade Association has a very useful guide for housebuilders and expertise in what conditions may be placed on small installations in terms of appearance.²⁷

6. Support vital clean air policies

Getting the air we breathe within legal and safe pollution limits and protecting all Londoners from exposure to air that harms their health is one of the most vital tasks for this Mayoral term. Nothing in the new London Plan should undermine efforts to reduce pollution to within legal limits by 2020 at the latest.²⁸



The ruling of the High Court on the recent case brought by ClientEarth noted the Government’s failure to draw up and implement plans that would make sure exposure to air pollution was reduced within the shortest time possible. Reducing exposure is an added dimension that has implications beyond the previous requirement of meeting limit values.

Along with the Mayor’s transport strategy, the London Plan should ensure that spatial development and investment in transport contribute to achieving these goals.

6.1 A more effective air pollution plan

At the core of London’s current plans to reduce air pollution is the new Ultra Low Emission Zone (ULEZ). By excluding most of outer London from protection, the Mayor’s current plans are not adequate, and by including only a cordon scheme with no element of distance-based charging, the scheme risks unfairness by not relating penalties to the harm caused.

Caroline Russell AM responded to the Mayor’s clean air proposals in July 2016, asking for further action including:

- Extending the ULEZ for light vehicles (cars, motorbikes and vans) London-wide rather than being limited to the North and South Circulars.
- For any diesel scrappage scheme to include other incentives for people to go car-free such as car sharing schemes, free public transport passes, cycle hire voucher schemes, or bike hangar funding for their street.

- For a London-wide road pricing scheme to be considered, based on emissions and distance driven.
- For the central London emissions surcharge to be higher and apply 24 hours a day and seven days a week.
- Traffic reduction to be a priority intervention, with measures for modal shifts to buses, trains, walking and cycling to complement it.
- Play streets and temporary car-free days in central London and supported for all boroughs.
- Support for boiler scrappage and clean energy.
- The scrapping of projects creating major new sources of air pollution, including waste incinerators.

Several of these policies can be backed up through planning policies and conditions on new developments to support their implementation.

Controls on river vessels

Some places in London suffer persistent air pollution from commercial river vessels. While the GLA Act does not give the Mayor powers to include commercial vessels as part of the ULEZ, the Mayor should lobby the Government to change this in any review of the Clean Air Act or similar legislation, and should make river pollution as important as road-based pollution in new development policies. In planning terms, no development that increases pollution due to the number or type of vessels it encourages should be allowed.

6.2 Better transport schemes

The indicative list of transport schemes that will go alongside the new London Plan should not be in conflict with its wider goals.

Several of the previous Mayor's transport schemes were contrary to the aim of reducing air pollution, in particular those which embedded or increased car travel, such as proposals to create new road tunnels at Silvertown and as part of orbital routes. These plans should be scrapped.

Transport investment needs to follow a rational hierarchy, putting traffic reduction, walking, cycling and public transport first, with any scheme to increase road capacity for motor vehicles rejected due to the inevitability that this will generate new road journeys and undermine the goal of reducing traffic.

6.2 Developments that bring cleaner air

It is clear that, to conform with the law, the next London Plan needs to do everything it possibly can to ensure new buildings and developments are at least truly 'air quality neutral', and ideally 'air quality positive' – helping to ensure we get air pollution below both EU-defined limits and World Health Organisation (WHO) guideline levels by 2020 at the latest. This means:

Clarity in new policies that any worsening of air pollution isn't acceptable from a development – in areas both above and currently below WHO levels.

New homes and infrastructure cannot hide behind other planned improvements in air quality to disguise their impact. Within London any worsening from a development should be considered 'significant' regardless of other action being taken – with a new practical limit of significance defined no higher than a change of 0.1 micrograms per cubic metre of any pollutant considered by the WHO to pose a danger to public health.

Even in areas where legal limits are not breached, policies should be clear that any worsening of air pollution will detract from London's overall goal of achieving compliance with the law in as short a time as possible.

Assessments of the impact of major developments must show not just current and future air pollution levels, but the amount of exposure local people will experience with and without the development over a fixed period, isolating the impact of the development itself for clarity in decision making.

The cumulative effect of smaller developments should not be ignored. Guidance should be produced that enables a simpler, estimated assessment of the impact of a smaller development to be carried out and submitted by all applicants, with a clear list of practical measures that should be taken.

Much more weight should be given to the risks to public health of adding new residents and users of facilities to an area that is already above legal limits for air pollution. Using measures of exposure will help with this, but consideration should be given to a policy that prohibits introducing children and vulnerable people for long periods into any area that exceeds pollution limits and prioritises the placement of homes, schools, care homes and hospitals in areas away from the worst pollution.

Planning conditions should require education of the occupiers of a new development to reduce the impact of their use of a building on air pollution. This should also include effective and regular maintenance of equipment and measures to ensure indoor air quality complies with the highest standards and best practice, such as air conditioning filters and window seals.

WHO guidelines should be used in policy development because, for some pollutants, they are tighter than EU levels as they are updated more frequently based on the latest scientific evidence, and because of the uncertainty brought about by the process of leaving the EU.

Effective policies on air pollution that follow these principles will make the approval of any further expansion of either major roads or airports in our urban area impossible, and are likely to add further weight to the need for car-free developments in all areas of London.

Supported by the NPPF: 17 – Core planning principles include “reducing pollution”
124 – covered air pollution, including sustaining and working towards compliance with EU directives.

Sources of further evidence: The Mayor is already supporting ClientEarth’s legal action against the Government. The firm’s planning experts should be brought in to assist in making sure the London Plan is compliant with the law

and doing the most it can to support clean air.

The Clean Air in London campaign has also built up a bank of expertise in this area, and should be consulted before new policies are developed.

The recent application for a cruise terminal at Enderby Wharf is an example of river pollution that has been difficult to oppose: www.change.org/p/stoppollution-at-enderby-wharf

7. Back a diverse and resilient economy

The NPPF is very clear that social, environmental and economic benefits should be sought “jointly and simultaneously”, and the best way to do this is to ensure that, at a strategic level, the next London Plan contains strong policies to support an economy that is more diverse and resilient.



7.1 A circular economy

Policies that support the re-use and recirculation of both physical resources and money are needed.

This means supporting smaller and local businesses that keep money in London and prioritising businesses that make the best use of materials, including those that repair and recycle goods that have previously been used in London.

The London Assembly Environment Committee released a report in March 2016 setting out how we can achieve long-term sustainable growth for London. It said:²⁹

“The current economy spends much money and labour extracting materials from the environment. After use, we throw a large proportion away, to landfill or incineration (damaging the environment) and lose much of the value in other materials by mixing them up and breaking them down in bulk recycling. London is vulnerable to price rises and supply interruptions of globally scarce materials. Moving to a circular economy protects against these risks, and offers job and earning opportunities.”

The committee recommended the Mayor should:

- put circularity at heart of the London Plan and our economic development strategies
- give priority and strategic focus to the top of the waste hierarchy; waste reduction; renting and service provision; and re-use.

London also needs a clear strategy to help make sure more of Londoners’ money stays in the capital and recirculates, which should include support from the Mayor for community banking and other non-traditional forms of saving and financing for small and local businesses. The Federation of Small Businesses has asked for this support, and its research shows that for every pound spent with large businesses 43p stays in the local area, compared with 63p for SMEs.³⁰

7.2 Protect industrial and work space

Industrial space and manufacturing

Work by former Assembly Member Jenny Jones showed that the previous Mayor's infrastructure plans set projections of employment that involved manufacturing jobs falling to just 15,500 by 2050 – a trend that would lead to manufacturing disappearing completely from London by 2062.³¹ London Plan monitoring reports



show that, from 2006-13, almost 604 hectares of industrial land were lost, more than double the target.

A City for All Londoners says “In some areas, industrial land may be surplus to current needs and could be better used for housing. It may be possible to relocate industry to other areas of the city without disrupting the economy or eroding the critical base of industrial land.”

This policy is out of date if London is to develop a more resilient and diverse economy. Given that London has far exceeded targets already, the new plan should not set new targets for the managed release of industrial land but rather for its preservation. The Mayor should include a strong presumption against further loss unless a case can be made demonstrating a genuine long-term vacancy on specific sites.

The London Plan should also protect shops, offices and industrial space wherever it is needed from permitted development – to support this, the Mayor should define specific wide areas as suitable for Article 4 Direction protections by local authorities.

Planning decisions should recognise and take account of existing local economies. Before any area-wide plans are made, detailed audits of workplaces, workshops, studios and jobs should be carried out, mapping supply chains and business connections. These should be used to produce economic impact assessments for large developments, and the Mayor should require that all existing economic activity is generously accommodated in new developments.

Affordable offices and mixed developments

On lower cost workspaces in offices, *A City for All Londoners* is better, saying the Mayor will “support small and medium-sized businesses by protecting existing workspace, identifying new workspace areas and including places of work in new housing developments. In areas where costs are very high, I want to make sure that new commercial developments include affordable business space, in line with different and changing business demands.”

I agree that the Mayor should support a range of occupations with planning policies to protect and enhance access to workspace, business support and training facilities. It should also be investigated whether (after the terms of exit from the EU are established) developers could be required to give priority to local businesses in tendering for contracts.

7.3 Define and encourage community meanwhile use

For buildings left empty, a new definition of temporarily empty space suitable for meanwhile use or ‘respacing’ should be established. This would allow and encourage owners to temporarily let out the space for a range of permitted community uses without changing its use class or requiring planning permission.

This policy could usefully combine with other policies to provide incentives – for example exempting empty buildings hosting respacing projects from the risk of compulsory purchase.

7.4 Protect our emerging heritage

Some boroughs are already seeking to protect distinctive localities or clusters of businesses, such as long-established and traditional retail and food and drink outlets, within their areas.

Many of these clusters have significance across London, not just in their area, for example a number of groups of longstanding LGBT businesses, and places such as Chinatown, Brixton, Elephant and Castle, Seven Sisters, Denmark Street and Brick Lane with significance for particular ethnic or cultural groups. These areas of ‘emerging heritage’ form a key part of London’s character as a diverse, cohesive, tolerant and global city but are rarely old enough for official heritage protection, especially as their traditions often depend more on custom and usage than physical features.

The London Plan should seek to encourage and build upon the efforts of boroughs by defining areas of ‘emerging heritage’ that have local distinctiveness and a London-wide significance. These should be given similar protections to conservation areas, with a statement of what characterises the area’s distinctiveness, support to preserve and enhance its unique characteristics and protection against changes of business use away from what has become traditional.

7.5 Strengthen the power of Asset of Community Value designations

Many communities have sought to protect individual local businesses, as well as buildings, green spaces and community facilities, as “Assets of Community Value”. These designations should be given weight in planning decisions, including changes of use, and the new London Plan should include policies to reinforce and increase this weight.

Supported by the NPPF:

17 – Core planning principles
157 and **200** – the use of Article 4 directions and permitted development.

On emerging heritage:

13 – contribution of new developments to local distinctiveness.

60 – “seek to promote or reinforce local distinctiveness.”

61 – heritage goes “beyond aesthetic considerations” to “address the connections between people and places.”

Sources of further evidence: The community organisation Respace can provide more information and evidence on effective meanwhile use policies and definitions.

A useful model for additional protections against change of use may be Camden Council's new policies to protect traditional pubs, which require specific evidence that the current use is not viable, including audited accounts and extensive marketing to potential new owners/managers.

8. Build safer and stronger communities

8.1 Protect community buildings and services

A City for All Londoners says "For me, safety means a London where nobody is more vulnerable because of who they are or where they live and where all services work together to reduce crime." The document sets out potential policies for protecting and enhancing community facilities, which we support, including the idea of a proposed 'Inclusive Neighbourhoods' principle.

Much of our 'social infrastructure' – places where people can meet and engage in community activity – is under pressure from increased land values and the profitability of residential development, even in rare cases where pressures on running costs are low. The new London Plan should increase and strengthen support for retaining and enhancing local facilities, particularly where these have been designated as Assets of Community Value (see section 7.5).

More attention also needs to be given to the location, not just the quality of services, with a presumption against the over-centralisation of services, which brings with it the need to travel, and potential difficulties in accessing services, particularly for young and older people.

8.2 'Designing out crime'?

The current London Plan (policy 7.13) says the police should be consulted on ways to improve security in designs of developments to reduce crime. While some principles advocated by the police, including overlooking of public areas, are useful we have some concerns about this.

Some of the design recommendations promoted by police can lead to solutions that don't maximise the utility of public realm for pedestrians and people on bikes, such as the removal of places to sit and community severance when 'escape routes' for criminals are closed off.

We recommend that the Healthy Streets and Lifetime Neighbourhoods principles are prioritised within the new London Plan as the best way to maximise the utility and feeling of safety in the design of public spaces and streets.

Supported by the NPPF:

58 – "create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion."

69 – "achieve places which provide opportunities for meetings

between members of the community who might not otherwise come into contact with each other.”

70 – “an integrated approach to considering the location of housing, economic uses and community facilities and services.”

Sources of further evidence: TfL’s Healthy Streets Principles and its public health experts should be consulted about the potential unintended consequences of policies to ‘design out crime’.

9. Protect open land and public spaces

9.1 Protect Green Belt and Metropolitan Open Land

Green Belt and Metropolitan Open Land currently have strong protections under the London Plan. However, in too many cases, rather weak arguments for ‘exceptional circumstances’ are being used to justify placing housing and facilities such as schools on land with these designations. The next London Plan should be clear about what ‘exceptional circumstances’ are and seek to tighten these protections.

A City for All Londoners rightly says: “I want to protect the Green Belt and other designated green spaces” and argues for town centre intensification.

We have sufficient land supply to resist any premature changes to current Green Belt designations. With an uncertain future in terms of economics and immigration (the major driver of population change in London) the wisest policy is to strengthen these protections to ensure that the best possible use is made of brownfield land, infill and densification over the period of this plan.

The success of the town centre first principle (and a clear sequential test) that was added to national planning policies during the 1990s has been well documented as a key contributor to reducing the rise in car traffic and these principles should be firmly embedded in the next London Plan.^{32,33}

A City for All Londoners also says: “I also want to agree joint infrastructure investment corridors (where infrastructure is planned to open up housing and other development) that stretch out beyond London’s borders.” But achieving this should also not mean weakening protection of the Green Belt. There is always the chance for a development close to exceptional new public transport links to make its case even with a strengthened policy, but a weakened policy is likely to lead to greenfield land being exploited first, because of its simpler economics as far as developers are concerned.

Supported by the NPPF:

Section 9, paragraphs 79-92

84 – covers sustainable patterns of development.

23 and 24 – taken together these paragraphs support both the location of homes close to town centres and a sequential test for locating developments in urban centres.

37 – aims to keep journey lengths down.
111 – freedom to set local targets for re-using brownfield land.

Sources of further evidence: The Campaign to Protect Rural England, London Branch, has expertise in this area and should be consulted about any plans for Green Belt and MOL protections.

PPG13 and the major 'On the Move' investigation of road traffic should be studied for ways to strengthen policies favouring town centre development first.

9.2 Improve access to and governance of new urban public spaces

Many people are concerned that a large number of new public spaces in London are being allowed to be created where public access is only at the discretion of the landowner and the local authority has no governance role over any regulations for its use. These 'private public spaces' are extensive and well-known examples include the Broadgate area of the City, Kings Cross Central and the More London development in which City Hall itself sits.

The growth of 'private public spaces' can be reduced with a simple new policy in the next London Plan. This should specify that new public spaces created in London must, through planning conditions, be governed by accountable public by-laws not private rules.

Supported by the NPPF: **57** – in the section on good design, asks for "inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes."
58 – "including incorporation of green and other public space as part of developments."
69 – "high quality public space, which encourage the active and continual use of public areas."
75 – "protect and enhance public rights of way and access."
Glossary – definition of 'inclusive design' is: "Designing the built environment, including buildings and their surrounding spaces, to ensure that they can be accessed and used by everyone."

Sources of further evidence: Walking and public access groups such as the Ramblers have strong campaigns on these issues and can provide evidence of the problems caused by private public spaces without accountable governance.

10. Adapt to a changing climate, secure our food supply and support wildlife

10.1 Enhance flood resilience

A City for All Londoners talks about "the provision of nature-based approaches to drainage to alleviate flood risk", which is welcome but must be backed up by very strong policies.

The Government's *National Flood Resilience Review*, published September 2016, was a reaction to the record rainfall and extreme flood events in places such as Cumbria and Yorkshire last winter (and Somerset levels in previous year) and how England could be better protected.³⁴ It concluded that for planning purposes "uplifts of between 20-30 per cent should be added to recent record-breaking rainfall events to generate plausible extreme rainfall events."



This means making London more resilient to floods is vital in the next London Plan and Environment Strategy, with at least the following measures, as well as the requirements for green roofs described in section 5.2.

Applying sustainable drainage plans to all applications

SUDS (Sustainable Urban Drainage Systems) principles should be applied to all scales of development, not just referable applications. These should include rainwater harvesting. The Just Space document *Towards a Community-Led Plan for London* proposes a SUDS supplementary planning document, which we support, as well as measures to ensure community involvement in the implementation of these measures locally.

Resist garden development

The Royal Horticultural Society has found that half of all London's front gardens are now completely paved over.³⁵ The London Assembly unanimously passed a motion in February 2016 calling on the Mayor and the Government to "review the permeable 'solutions' element of the permitted development regulations, including the use of grilles, and to consider promoting lawns, flower beds, rain gardens and other vegetation over other permeable options such as permeable block paving, porous asphalt or concrete."³⁶

The new London Plan should define tighter conditions and exemptions from front garden permitted development, particularly in surface water flood risk areas. Preventing the creation of more driveways would also support sustainable transport policies.

Integrate flood planning with river restoration

In light of the growing consensus for whole river catchment approaches to mitigating flood risk, the Mayor's Environment Strategy should draw up action plans for each of London's thirteen river catchments and target the restoration and re-wilding of at least 50 km of rivers. New developments should not be allowed if they would interfere with these projects.

Supported by the NPPF:

53 – "resist inappropriate development of residential gardens."

Section 10 paragraphs 93-104

114 – "a strategic approach... to networks of biodiversity."

117 – "promote the preservation, restoration and re-creation of priority habitats."

Sources of further evidence: National Flood Resilience Review, published September 2016 (see references)

Royal Horticultural Society resources on gardens and paving:
www.rhs.org.uk/science/gardening-in-a-changing-world/greening-grey-britain

Thames 21 is an umbrella group for organisations involved in river restoration/catchment work in London: www.thames21.org.uk

10.2 Increase food production in London

There is no mention of policies to support food production in *A City for All Londoners*, which is very disappointing. The London Plan must help to increase the amount of sustainable and locally produced food grown in and around London.

This can help alleviate food poverty as well as increase the environmental sustainability of our food supply. The London Assembly Planning and Housing Committee highlighted in 2010 that London is very dependent on food imports and has only three or four days' stocks of food if there is disruption to supply.³⁷ Despite this, much of the agricultural land around London – around 15 per cent of the capital's total area, mostly in the Green Belt – is not actively farmed.

Maximising food production in and near London must be the goal of a range of policies in the new London Plan and no opportunity should be missed.

New policies should specifically state that food growing is one of the most beneficial and productive land uses in the Green Belt. They should require boroughs to give added weight to food growing as one of the most productive activities in the Green Belt when preparing Local Plans.

Policies to support the local economy and retail sector should include support for street, farmers' and, where relevant, strategic wholesale markets that support locally and regionally grown food.

Food producers from the capital and its fringes should be given more opportunities to sell their produce directly to Londoners, whether at markets, to schools and hospitals and other parts of the public sector, or to the restaurant and hospitality sectors. This can be through London's wholesale markets or by new innovative supply chains.

Practical policies for new developments and refurbishments should ensure food growing is included, particularly on large housing estates.

Policies for resilience should also seek to protect any areas currently used for food production in the Green Belt and within London's boundaries, and give the strongest protection to existing allotments and ensure their provision wherever possible in new developments.

Supported by the NPPF: 17 – Core planning principles on mixed developments including food production

Sources of further evidence: Cultivating the Capital, by the Planning and Housing Committee, 2010.

Sustain is an organisation with a huge amount of expertise in helping create the physical and social infrastructure for food growing. Its London Food Poverty Profile sets out a way to measure the health of local areas according to the availability and cost of local food.³⁸

10.3 Improve biodiversity

There is growing concern at the loss of London wildlife – formerly familiar species such as hedgehogs and sparrows are in danger, with valuable insect and plant habitats being cleared away as London develops. With further densification, there is a risk that this will only get worse.

Given this crisis, there is a strong argument that all designated nature sites, including borough and local Sites of Importance for Nature Conservation (SINCs), should be given the highest protection in the London Plan. This is consistent with the NPPF, which allows for the importance of sites to be used to determine protections: we argue that every remaining listed site in London, at whatever level, can be considered very important.

Implementing this policy will require a review of local as well as Metropolitan SINCs, which have not been consistently assessed for some time. Both the London Assembly Environment Committee and London Wildlife Trusts have recently expressed concern about this.^{39,40} Planning application impacts on Metropolitan SINCs should always be referred to the Mayor.

In practical terms, all new developments need to deliver net biodiversity gains and enhance not merely protect biodiversity. The London Plan can do a lot to help if it includes clear, simple and inexpensive planning conditions set out in policy and supplementary guidance that make specific requirements for nature to be given a home in new developments. These could include:

- requirements for wildlife habitat and homes, such as bird and bat boxes and insect habitats, to be incorporated within all new buildings (and refurbishments)
- native and bee-friendly planting in and around developments
- street tree species that are native and contribute the most to biodiversity
- hedgerows as part of landscaping
- specific measures to support critically endangered species such as hedgehogs
- stronger protections for large canopy and veteran trees

Supported by the NPPF: 109 – “providing net gains in biodiversity where possible”
113 – on nature sites says “protection... given appropriate to their importance”

Sources of further evidence: A rapporteurship for the Housing Committee will soon report on the potential for more biodiversity in housing developments.

London Wildlife Trusts are an authority on urban biodiversity and their plan for London is set out very clearly (see references).

Evidence on current biodiversity challenges can be found in the London Wildlife Trusts' report ' from 2013: All changes? The status of biodiversity conservation in London.

For more information on incorporating wildlife into modern buildings, Swift Conservation should be consulted. www.swift-conservation.org

What do you think?

I would like to keep hearing your views on planning for improvements in these areas of policy, so please contact me to share your ideas and solutions.

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This report sets out the views of an individual Assembly Member and is not the agreed view of the entire Assembly.

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