

COMMENTS BY THE LONDON FORUM ON THE DRAFT FURTHER ALTERATIONS TO THE LONDON PLAN OF JANUARY 2014

The London Forum of Amenity and Civic Societies (London Forum) is a charity established in 1988 to support and represent over 130 community groups in the GLA area.

The London Forum is concerned that in the draft further alterations to the London Plan (FALP) there is uncertainty about London's population figures, the levels of increase in population over periods that FALP covers, the expected increase in households, the backlog of unmet housing need and the number of homes for key workers on low incomes that the housing funding can provide.

That indicates that further alterations (paragraph 3.16a) or a full replacement London Plan will be required soon and these interim alterations in FALP can provide only a short term guide to what has to happen to avoid a housing crisis in the Capital and the effect that would have on London's economy.

There is doubt about the outcome of the discussions held by the Mayor and the GLA officers with local authorities outside London under the Duty to Cooperate and what could be done by those LPAs to assist with housing.

In the draft housing strategy for London the Mayor detailed eighteen changes that he will seek from Government or implement himself to close the gap between the FALP's target of 49,000 additional homes annually and the 42,000 pa which is all that the London boroughs have identified land for development. **It is not clear how many more homes each of those initiatives or demands by the mayor would deliver, so that they can be monitored for effectiveness. The Examination in Public (EiP) should examine this based on an update by the Mayor.**

Against a possible need of 62,000 additional homes each year, the 49,000 target seems to be inadequate but it is two and a half times the recent annual rate of delivery of new homes, which indicates how difficult the target will be. The new higher rate of delivery has to be consistent over a number of economic, public spending and political cycles. Such levels of housing delivery have not been seen since the 1930s and have not been sustained for anything like a 25-year period.

The London Forum considers that the main problem with the FALP is that it is unlikely to deliver the quantity of social-rented homes that will be required for key workers, as identified by the Mayor's draft Housing Strategy pages 3 and 12. It is not reasonable to rely upon housing and other benefits to house people on low wages in the Capital nor to subject them to higher travel costs if they are forced out to the suburbs.

The London Forum suggests that the increased housing density proposed by these London Plan alterations may not be sustainable, nor deliver a good quality of life for inhabitants of new developments.

The alterations have removed many references to 'open space' which is unacceptable to London Forum and for which no explanation is given.

The other key issues that London Forum has identified in the FALP are as follows.

To be developed for the final response

In the comments below, the alterations in the FALP that are quoted are shown in **blue** and the changes London Forum proposes are in **dark red** text. Paragraph or policy numbers are indicated.

All references to 'LDF' in FALP should be changed to '**Local Plan**'.

Overview and Introduction

- 0.12 The London Housing Strategy is being updated but the Mayor's Transport Strategy and Economic Development Strategy will be over four years old by the time of the examination of this FALP. **It would be useful for the Mayor to produce for the EiP details on which parts of those strategies may no longer be applicable or up to date and what may replace them. Draft revised version would be useful.** The Economic Development Strategy is affected by the Government's relaxation of permitted development for conversion of offices to flats. The Transport Strategy needs to indicate how the best interchange facilities will be achieved between HS2 and all other transport links in the Old Oak Common Opportunity Area, which will be covered now by a Mayoral Development Corporation.
- 0.13 This paragraph does not make clear that there was an interim version of the London Plan as the Revised Early Minor Alterations published in October 2013, as in paragraph 0.16C.
- 0.15 The end date of the 2008 London Plan does not seem to be relevant. The end date of 2031 of the 2011 London Plan should be indicated instead.
- 0.16 The alteration states that the effectiveness of the 2011 London Plan policies have been monitored. However, the policies have failed to deliver the 32,000 pa target number of new homes, with only around 20,000 pa in recent years. **It would be useful for the Examination in Public (EiP) for the GLA to state the reasons for that shortfall, based on their monitoring, and their view on how long it will take to achieve the first annual delivery of at least 42,000 new homes annually and the target level of 49,000 pa.**
- 0.16C Regarding the revised early minor alterations were made to the Plan in 2012-13, the Mayor refused to accept a recommendation by the examining Inspector on the freedom of boroughs to set their own rents for social housing they deliver using their own land and financial resources. **The implications of that need be reviewed during the EiP of this version.**

Chapter One - Context and Strategy

A more concise but clear explanation of London's regional and international context could be provided, mentioning their respective developmental imbalances. The particular international circumstances which have led to the commodification of property through international investment have resulted in this type of property being allowed to take over more than its fair share of London's developable space. This should have a comment in the FALP.

A growing population

1.4 Extra text should be inserted here to make it plain that to meet the demands of that population **There will be urgent requirements for infrastructure such as additional reservoirs or alternative sources of water supply and an improved availability of electricity at the required reliability in key areas of the Capital.**

1.7 The description of population growth in paragraph 1.7 and the Figure 1 of GLA estimate of **population growth to 2036 will need to be considered carefully at the EiP** in case there were many people present in London who were not counted in the 2001 census.

Map 1.1 is surprising for its indication of lower rates of population growth in West London where there are growing immigrant communities from countries where people tend to have more children than has been the average in London.

It should be clarified that the numbers in paragraphs 1.7 to 1.10 refer to people, not households.

1.10 The wording here in FALP could propose providing a conservative volume of high-quality, long-term housing, both social and at genuinely affordable market prices, whilst ensuring sites for business and for industrial production. Consideration could be given to the fundamental needs of this city for continuing access to clean water, power, and flood resilience. The FALP could argue also for optimum use of the large volume of characterful and diverse existing residential accommodation (recognised briefly in Chapter 2 paragraph 2.31).

Cross references in Chapter 1 to Chapter 5 would be helpful.

1.10A This paragraph has some sensible warnings about the uncertainty about migration and other influences on population numbers. **These will require close examination for any new information on these aspects published in the eight months from the compilation of FALP at the end of 2013 and its EiP in September 2014.**

1.10C London Forum **supports** the consideration of three demographic scenarios. Although the central one has been chosen for the FALP, each of them should be monitored to assist in any further alterations and for a replacement London Plan.

A changing population

1.12 Almost half of the London boroughs will have a majority of Black, Asian and other minority ethnic communities before 2036. The integration of minority groups and their special needs for creating sustainable communities **should be explained** for consideration for policies in this and a replacement Plan.

1.14 The extra working population of over one million people needs to be considered against the number of new jobs that the FALP predicts will be created over the plan period. **The 3.9% increase in jobs in one year stated in paragraph 1.17 should be clarified** in terms of type of job and numbers per sector. Paragraph 1.24 states that only 861,000 jobs will be created over the plan period, which implies a potential, **increase in**

unemployment and associated costs of benefits. **The implications of that need to be explored in the EiP** in its consideration of the economy. **The Mayor will need to consider and suggest how well unemployed people can be trained for the job types indicated in paragraph 1.24A.**

More households

1.15 This paragraph and 1.15A demonstrate yet another unknown factor for consideration against the FALP housing targets and that is the real size of the average household. Immigrant communities are prepared to flat share to a greater extent than Londoners have recently. That may continue and extended families sharing a home may increase due to high rental costs. **A paper on this subject for consideration at the EiP would be useful.**

1.15B 3.74 million households by **2021**, not 2012.

A growing and ever-changing economy

1.25 and Map 1.2 for distribution of employment growth. The South London Partnership of boroughs has higher aspirations than shown in FALP for employment growth. Their use in future of partially protected strategic industrial locations needs to be taken into account. The low figures for employment growth in Table 1.1 for LB Ealing and LB Hackney need **further explanation.**

Persistent problems of poverty and disadvantage

1.30 This paragraph introduces for FALP the term "social/affordable rent" housing. London Forum **objects** to this new definition. The 2011 London Plan had clear specific policies for social housing provision and affordable housing. The new term which mixes housing types for low and middle income households does not assist in planning for homes for distinct groups of residents. It is confusing, as we comment further for Chapter 3.

A changing climate

1.37 London Forum **welcomes** the new emphasis on electricity supply, as it is understood that the Victoria and Oxford Street areas have only just enough electricity for peak consumption and without action on this issue the economy of London will be harmed. See our comments on Chapter 5.

A changing planning system

1.45 Correct the words to **London's growth**,.....
London Forum **welcomes** the emphasis at the end of the paragraph on the required infrastructure. There is a lack of it now because of the opportunity given by Minister Nick Boles to developers to claim that their schemes would not be viable unless they were allowed to contribute no S.106 or CIL payments and to provide no affordable housing. The resultant deficit in homes for people on low wages and in social infrastructure, services and schools is serious and will cost considerable amounts to rectify. The new reference in paragraph 141 to the **Mayor's London Finance Commission** is relevant for its recommendations on retaining in the boroughs more of the taxes and other charges raised locally. **The Government's response to the Commission's recommendations needs to be available for EiP consideration.**

1.46 The alteration to the words about the London Legacy Development Corporation could be **expanded** to cover the new **Mayoral Development Corporation for the Old Oak Opportunity Area.**

Planning for growth

- 1.47 ...'**described recently by the Mayor.....20/20 Vision which runs through.**'
Substitute with **The policies presented in the Mayor's 20/20 Vision are central to London Plan policy.**
- 1.48 The population is **not** ageing more **rapidly**. Better words might be a **growing number and proportion of the population are now in the older age groups,.....**

Chapter 2 - London's Places

Policy 2.2 The alterations to this policy for working with local authorities in the Outer Metropolitan Area raise the question of what has been achieved in the Mayor's negotiations with them "to realise the potential of, and address the challenges facing, the city region as a whole and areas within it (particularly the growth areas and corridors referred to in Policy 2.3), especially those dealing with population and economic growth, infrastructure and climate change." (as in C). With the emphasis now on the serious shortfall of existing and planned homes for Londoners, **the Mayor should inform the EiP of what he has achieved with neighbouring authorities to meet the challenges, particularly of population, outlined in paragraph 2.12.**

Realising the benefits of 2012

Policy 2.4 **The DPD that is being prepared by the LLDC (B) should be made available before the EiP** so that consideration can be given on whether or not it meets the aims "to help meet existing and new housing needs – particularly for families."

London Forum **supports strongly** the alterations to section C of this policy for boroughs to plan for and commit to the aims of the LLDC. **It would be useful at the EiP to hear their response to the requirements placed upon them to test if the DPD and their own plans make this part of FALP sound.**

London Forum **supports** the requirements in C f for workspace to be created but proposes adding the words **including ones that are affordable for small enterprises** after the word **workspaces** to relate this section to paragraph 2.34.

London Forum **supports** the alterations for the legacy policies for the Olympic Park and surrounding area. However the introduction of the words **seek to** with regard to closing the deprivation gap between the Olympic host boroughs and the rest of London is disappointing. The development should have that as one of its **key aims**. This should be covered in section C of the policy by an additional requirement **h to Close the deprivation gap between the Olympic host boroughs and the rest of London**

2.19 London Forum **welcomes** the clarification that the Local Plan (DPD) of the LLDC plus the London Plan will form the development plan for decisions to be taken in the LLDC area. The Mayor must regenerate and develop the area in a way that is in accord with that development plan, unlike some of the developments he has approved for other locations after call-in or review.

Add to the end of the paragraph **There will be full engagement of local communities.**

Outer London

2.31 Although recognising the validity of the alteration about **recognising the positive contribution of existing, lower density housing**, it should be stated that **Existing low-quality housing should be considered for redevelopment** as in Policy 2.7 A h. As an example, houses on some main roads have been boarded up for too long.

2.34 Add **and serviced offices** after **affordable workspace**. **Flexible business use of existing buildings** is **supported** by the London Forum to maintain supply of affordable workspace.

Policy 2.8 The additional reference in h to **greater dependence on the private car** seems to be an admission that public transport, particularly buses, is not being developed sufficiently to meet the Mayor's strategic aim in Policy 6.1 to "reduce the need to travel, especially by car". Now that the UK and the Mayor are facing fines by the EU for air pollution, it is essential that reducing travel by private car is a policy for all developments and there must be more public transport links. Any **guidance** should be **to reduce dependency on the private car**, not just **reflect** it. In section h the words and **guidance which reflects greater dependence on the private car**; should be replaced by **and guidance which emphasises the provision of an efficient and integrated public transport system**;

That would enable the London Plan to be in general conformity to paragraph 35 of the NPPF.

The use of the word **greater** in this alteration is meaningless unless it is made clear than what it is supposed to be greater. Evidence will be needed if it means that there is a dependency on the private car in Outer London than previously. The use of the word may have been meant to indicate the dependency is more than in Inner London.

It is not clear what the **guidance** in the alteration was expected to contain.

2.36 The **flexible approach** to car parking standards and the scale of relaxation and guidance also in Policy 6.13 and Table 6.2 are of **considerable concern** to London Forum. It is recognised that boroughs face competition from local authorities in the Outer Metropolitan Area where more car parking may be allowed in developments. However, this paragraph urges a strong business case by boroughs for investment in more transport and boroughs should try to secure developers' contributions to that and travel plans, such as shuttle buses to main stations. This policy should not encourage more use of private cars on London's roads.

Inner London

Policy 2.9 London Forum **supports** the alteration for **ensuring the availability of appropriate workspaces** in Inner London. However, to relate to paragraph 2.34 and our comment on Policy 2.4 above, the word **affordable** should be inserted after **appropriate**. The delivery of workspace **should be monitored and reported**.

2.38 To continue the points above, the word **affordability** should be put after **clustering**.

London Forum **welcomes** the recognition of job growth in Inner London.

The Central Activities Zone

Policy 2.11 London Forum **welcomes and supports** the requirement for boroughs to plan to provide more detailed policies for their parts of the CAZ. There are still some boroughs with a Local Plan and associated DPDs/AAPs which are not up to date. After . . . **and in Policy 2.10** put **and Policy 2.15 for Town Centres**.

2.46 London Forum **supports** recognition of the need to retain workspaces technology, media, etc in and on fringe of CAZ.

Opportunity areas and intensification areas

2.60 **The Mayor should publish the basis for the alterations that increase the estimates of the number of homes and jobs that Opportunity Areas can deliver.**

2.61 The alteration states that **The Mayor expects both types of area to make particularly significant contributions towards meeting London's housing needs.** This is unrealistic and fails to recognise the diversity between Opportunity Areas. The Tottenham Court Road Opportunity Area is contiguous with both Soho and Covent Garden and lies close to the British Museum and Bloomsbury and is a heritage area. While Centre Point, as a single building does not cause significant harm to the area, an over-weening collection of residential towers would. Delete **to make particularly significant** and insert instead **to make contributions towards meeting London's housing needs in line with prevailing housing densities and the character of the area, to conform to the Mayor's Context and Character SPGs and the policies for context sensitivity in Chapter 7, particularly Policies 7.1, 7.2, 7.4, 7.5, 7.6, 7.7, 7.9, 7.12 and 7.18.**

The London Forum is **extremely concerned** that this alteration appears to be leading up to proposals encouraging densities in excess of the maximum of the appropriate density range simply because a site is in an Opportunity Area or an Intensification Area.

2.62 London Forum **is concerned** about the way the alterations here and in paragraphs 2.63A and, especially, 2.85 encourage developments at and above the top end of the density range appropriate to each development site. The suggestion that densities above the appropriate density range are likely to be acceptable, albeit in "exceptional circumstances". It is not clear, from letters from the GLA Decisions Unit, what the Mayor believes justifies these departures, as most of the considerations are embodied in the factors that influence where **within** the appropriate density range a particular development should be placed. These considerations are broad enough to leave few, if any, additional considerations which could be said to justify the development having exceptional circumstances. There has been little attempt to maintain developments within the very generous ranges provided by the Density Matrix.

The SHLAA was conducted on the basis that land identified for development would have its capacity based housing on the mid-point of the identified appropriate density range based on the density matrix, with the detailed circumstances of the site determining where, **within** that density range, the final density would be agreed. Any increase achieved after considering local circumstances would be a bonus. The London Forum is, however, **very concerned** that higher densities are being proposed before any scheme has been proposed and the impact of such higher densities has been tested. **An even greater concern** is that there may be pressure for Borough's to use densities above the top of the appropriate density range without making clear what exceptional circumstances would justify this – even though it is contrary to policy, conflicts with Key Performance Indicator 2 in Table 8.2 and needs to be related to local transport and social infrastructure provision. Setting higher density assumptions for assessing capacity would be premature if these assessments have not been made.

The second Key Performance Indicator in the FALP Table 8.2 is unchanged and states the target of "Over 95 per cent of development to comply with the housing density location and the density matrix (Table 3.2)". At present only around 45% of delivered developments comply – a major policy failure. There is a serious danger of providing housing at densities that demand more than the local infrastructure can provide and which are not sustainable for quality of life of those who live in them and which are sub-standard compared to the Mayor's SPGs on children's play space and private amenity space and to CABE/EH guidelines for avoidance of overlooking and to prevent light to habitable rooms being below BRE guidelines.

The Mayor should be asked by the EiP Inspector to produce for the examination more details to support the Housing SPG's "exceptional circumstances" that allow densities above those considered by the Table 3.2 Sustainable residential

quality (SRQ) density matrix to be acceptable.

The Housing SPG (para 1.3.7) says:

“Development at densities outside these ranges will require particularly clear demonstration of exceptional circumstances (taking account of relevant LP policies and the considerations outlined in paragraph 1.3.41)”

Para 1.3.41 of the Housing SPG suggests some fine-tuning reasons for higher densities, rather than the Outer London Commission’s proposal that such exceptions must be justified robustly.

Therefore, the words in paragraph 2.62 **towards the top of the relevant density scale where appropriate** should be understood by the boroughs and the Mayor’s Planning Decisions Unit to require developments to be **within** the appropriate range for their site, except in up to 5% of cases which could be above or below the limits of the range. That would achieve a higher degree of conformity with Policy 3.4, which requires developments to be **within the relevant appropriate density range shown in Table 3.2** and also **Development proposals which compromise this policy should be resisted**. The last ten year’s outturn figures show that the Decision Unit have not applied this policy for strategic housing schemes. There is a major mismatch between policy and practice which developers have fully exploited. Suggestions for further “relaxation” will not help improve performance on the Key Performance Indicator.

There should be an addition to paragraph 2.62 for **The Mayor will work with local communities in and adjacent to Opportunity Areas and to establish local priorities and requirements**.

The alteration states that **aspirational employment allocations should not fossilise potential housing’ (see Policy 3.3)**. **This prioritises residential use over employment and in local terms may not be either realistic or feasible**.

Regeneration areas

2.63A While regeneration is welcome, it may well not be necessary to encourage housing at a **higher density** in all boroughs. It may be appropriate and economically more viable sensitively to **Refurbish the existing housing stock so that it is available for long-term use with enhanced capacities**.

There should be a **cross reference** to Annex 2 which identifies the centres that are to be regenerated.

Town centres

Policy 2.15 London Forum **supports** the inclusion in Policy 2.15 C of **retail to residential permitted development prior approval** as it flags up for Boroughs that, as far as is relevant, most of the normal criteria for assessing retail applications still apply proportionately to prior approval applications for converting retail to residential.

London Forum **supports** the alterations in section D a2 in this policy for identifying town centre boundaries, primary shopping areas, primary and secondary frontages shopping areas in LDF proposals maps and setting policies for each type of area. The requirement of a2 is **essential** to protect shopping parades and their reinvigoration and reconfiguration from the harm introduced by the DCLG permitted development of conversions of shops and other buildings.

London Forum is **concerned** about deletion in D b of the requirement that Boroughs should identify smaller, local centres - this is essential for defining policies for neighbourhoods as required by Policy 7.1.

London Forum is **concerned** that the scope for and viability of high-density, residential-led, mixed-use town centre redevelopment, as proposed in D c, has not been tested. As written it seems to encourage developers with promises of densities that exceed the upper limits of the appropriate density ranges, but do not provide sufficient safeguards for maintaining the supply of affordable space for community uses and small firms suggested in new para 2.72G.

In this policy's section D c the words **(in high PTAL areas)** should be inserted after **high density**. It is also essential to reconcile high-density development with context.

The use of **the Compulsory Purchase process** in that section is **supported**.

In part D c3 there is a **need to spell out key uses that local centres need - GP surgery, pubs, pharmacies, etc.** This material relates to place-making and the range of the offer of neighbourhood centres – it **needs a cross reference to Policy 7.1 and Policy 7.1 needs a cross reference to Policy 2.15 D c3.**

- 2.72 The monitoring by the boroughs and the GLA of the **impact of government's liberalisation of permitted development rights for changes of use from offices to residential outside exempted areas** is **supported** by London Forum. **Evidence should be available at the Eip of FALP on the effect of this PDR on London's economy.**

Higher density development should focus on both public transport accessibility and capacity, and seek to increase vitality and viability.

There is a need to encourage offices, not just housing, above shops in town centres. Add **offices and** before "housing" in line 16.

- 2.72A London Forum **supports** the management of negative impacts of clustering – watch this space.

- 2.72C New growth should be met **largely within town centres.**

- 2.72D London Forum is **concerned** about the future of medium-sized centres. There is a need for a strategy for medium-sized town centres at Borough level in Policy 2.15 D - see paragraph 2.72E second bullet. There is a whole layer of proactive planning missing. London boroughs should draw up a borough-wide strategy for its town centres, with a clear indication of the role of each centre and strategy for each centre to maintain or enhance their vitality and viability. **The LDF section of 2.15 totally lacks any strategic direction – just useful guidance on nuts and bolts.**

- 2.72E London Forum **supports** the strategy set out in this paragraph. However, London Forum is **very concerned** about the London Plan expressing support for redevelopment of "surplus" shops for housing in the third bullet. In some areas these are not "surplus", but under pressure for redevelopment by developers, whilst in other areas there may be a need for redevelopment. A blanket statement is totally inappropriate. Not only is a "lighter touch" needed but a much more sensitive approach to assessing whether the space is genuinely surplus or merely targeted by developers who specialise in cannibalising shops in neighbourhood centres. The redevelopment of these cherry-picked units may prove the tipping point for the decline of such centres. Change wording of the third bullet:

a lighter touch, more sensitive approach in Neighbourhood centres to sustain and improve their offer and, where there is clear evidence that the retail function is no longer viable, to support the redevelopment of these units for housing

2.72F London Forum has **concerns**, as above, about the proposal to **exceed** the appropriate density range. These are not "exceptional" circumstances. In particular, London Forum has concerns that **the residential element of mixed-use development is likely to have scope to go towards the top end of the relevant density range** is liable to misinterpretation in that it might be thought to mean that the density of the housing element would be at that level even though it may be on top of a couple of floors of non-residential uses. This would produce high-rise buildings totally out of scale with their context. The material in this paragraph appears to contradict the advice on measuring density of mixed-use schemes in the Housing SPG (para 1.3.47), which advises that the housing density needs to relate to a reduced site area to reflect the proportion of the total floorspace that would be in residential use. London Forum proposes the **deletion** of both **the residential element of mixed-use development is likely to have scope to go towards the top end of the relevant density range.**

2.72G London Forum **supports** the need ensure an adequate supply of affordable space for community uses and workspace for small firms. London Forum is **concerned** that major redevelopments in town centres could result in a loss of affordable space unless there is a policy requirement to replace such space built into any consent.

The alterations refer to **requiring innovative design solutions.** London is full of excellent, functioning historical and wonderfully urban (tried and tested) 'design solutions' such as the hierarchy of streets and garden squares in central London developed so well by the great estates, the 'village greens' of the various Actons, the numerous enclaves of small housing estates constructed from the late 18th century through to the early 20th century and dotted throughout London. **They must not be ignored.**

London Forum **supports** **Site assembly could well be a challenge and require use of the Compulsory Purchase process.**

Strategic industrial locations

2.85 The **release of surplus industrial land** should be only where it is truly "surplus" and **the meaning of that term should be explained.**

London Forum **questions** the extent of "surplus" industrial land that exists around public transport nodes and town centres.

Add at the end of the paragraph **If land released is not really surplus to all the latest requirements, the borough should make provision for alternative workspace elsewhere.** The limitations on SIL release in paragraph 2.84 are important. Because the subject of SIL is covered also in other parts of the London Plan, there should be cross references as follows: **See also paragraph 3.19 and Policy 4.4.**

It should be examined at the EiP of this FALP how much SIL would be around public transport nodes.

There is here yet another reference here to "exceptional circumstances" justifying housing densities above the top of the density range - there is no such justification. Such locations would already be in the highest density range and there are unlikely to be "exceptional circumstances" not already reflected in the requirements of that range.

Strategic network of green infrastructure

Policy 2.18 London Forum **objects strongly** to the deletion of “open space” in the policy description and its section F a and in paragraph 2.89. This retrograde step will hamper the policy of protecting the green infrastructure. Nevertheless “open space” remains in many parts of the text, (e.g. in the title of Map 2.8); and the Glossary defines 'Open Space' but not 'Green Space'. Are green spaces a subset of open spaces? Are they synonymous? Are there spaces which are green but not open? Or open but not green? The GLA must explain and justify what it is trying to achieve by these changes. The London Plan must have a consistent terminology throughout.

The alteration is unacceptable and contrary to the aim for sustainable development of the NPPF. Open space is vital to creating sustainable communities and it is covered in other parts of the London Plan which should be **cross referenced** in this policy: **See Policy 7.1, paragraph 7.5, Policy 7.4, paragraph 7.16, Policy 7.6, Policy 7.18 and table 7.2, paragraph 7.96, Table 8.2 item 3 and the descriptions of open space opportunities in Annex 1.**

Not all open space is **green infrastructure** and not all green areas are open space. The original words on open space have a footnote reference to the Mayor’s Open Space Strategies Best Practice Guidance - GLA, 2009 which is retained, **so it is pointless deleting reference to open space.** Map 2.8 which follows is specifically for ‘open space’.

These alterations are unreasonable and not in accordance with the last bullet point of paragraph 2.88 and the strong policies in Policy 7.18 for PROTECTING PUBLIC OPEN SPACE AND ADDRESSING DEFICIENCY.

Paragraph 7.16 has the words “Open spaces include both green and civic spaces, both of which contribute to the provision of a high quality public realm (see Policy 7.18).”

2.88 London Forum **supports** the alterations in this part of FALP for green infrastructure. However, the text has gone too far in assuming that all open space can be considered to be part of London’s green infrastructure, as commented elsewhere in this response to FALP. For example, school playgrounds and some recreation grounds are not ‘green’ in the sense of having grass, bushes or trees.

2.89 The alteration in this paragraph which deletes the term ‘open space’ is **wrong** and should be removed or replaced by **Green Infrastructure and other open space strategies are a key element in promoting and enhancing and ensuring effective design and management of** The term “Open space” has been replaced initially with “Green infrastructure”, but the section still includes a reference to “open spaces”. It is considered that the alteration to remove “open Space(s) merely confuses Policy 2.18 and the supporting paragraphs 2.88 and 2.89 and that this alteration should not be made.

Key Diagram

Opportunities are evident in the growth corridors for the creation of jobs and homes. More housing for London’s workers should be possible in areas well connected by public transport, although travel costs could be a problem. At present over 800,000 people each day commute into London and an increase in that number would require revision to the Mayor’s Transport Strategy to show how and where more transport capacity could be generated. There should be a statement that **The Growth Corridors will be assessed for their potential development of additional jobs, housing and potential new or expanded towns.**

Chapter 3 - London's People

London's housing requirements

- 3.16 The **uncertainty** in future population as described should be **explored at the EiP**. They need full monitoring and early review.
- 3.16a The relationship between additional households and additional homes **needs clarification** in view of the trend towards more single person households and the needs of the elderly.
- 3.16b The SHMA indication that 62,000 additional homes annually are required between 2015 and 2026 is a **cause of concern**. The FALP target of 49,000 additional homes per annum against that figure would result in a significant increase in the housing backlog which was stated by the GLA's David Lunts at an NLA conference to be 350,000 dwellings at February 2014. The Mayor's Housing Strategy warns on page 12 that there could be a lack of homes for professional people in London and for those key workers on low wages needing affordable rents.

The adverse impact on London's economy of those deficiencies could be serious.

The contribution that local authorities outside London could make to the Capital's unmet housing need has to be investigated. The extra homes that could be delivered by the Mayor's **eighteen options in the Housing Strategy need to be evaluated** for the increased number of homes that each could deliver and **reported to the FALP EiP**. That extra growth needs then to be assessed for the provision of the required infrastructure and the possibility of failing to deliver the elements of that.

An alteration to this paragraph removes the Mayor's intention to address the existing backlog over ten years. It is understood that his aim to achieve that is now over a 20-year period.

The alteration includes the anticipated under delivery between 2011 and 2015.

The target in the 2011 version of the London Plan was 32,000 new homes each year but in 2012-13 only 18,000 new homes were completed and the average number over several years has been around 20,000, an annual quantity delivered in the 1960s just by the boroughs themselves. The 'ramp-up' from 18,000 new homes a year to 49,000 could be too slow.

An estimate of the increase of delivery each year to 2018 should be included.

London Forum considers these aspects will be major issues for the EiP.

- 3.17b This alteration states that **It is clear that a step change in delivery is required if London is to address its housing need. The methods will need more explanation.**

New paragraph 3.17b refers to the challenge of translating capacity (planning approval - some 55,000 a year) into completions (the average since 2004 being around 25,000) and states that a step change in delivery is required for London to address its housing need. The SHLAA refers to this need for a step change and sets out four key areas where change is needed to reach a housing development level of at least 42,000 homes a year. These are Finance, Product, Land and Quality (SHLAA section 5.13). The planning system is identified in 3.17b as no means the only barrier to delivery. The planning system apparently provides approval for some 30,000 more homes than are actually built each year. The proposed alteration of section 3.17b falls far short of setting out what is needed to achieve the delivery acknowledged throughout the London Plan and is therefore not acceptable in the present form. The section should spell out the above four key areas and address the problem. As the Plan stands, even with the proposed alterations, it fails to achieve the aims of the Plan.

3.18 The alterations impose unrealistic targets and requirements for residential development arguing that London's circumstances are unique. There is no evidence that enforcing such uniformity of response in the face of the boroughs' diversity of need and varying potential for sustainable development is anything but ill judged in practice. There is a need to define objectively-assessed need for London and its boroughs.

3.19 It should be considered how to reduce the gap if "housing" is leaking out of the system.

The additional potential in OAs and town centres will be under pressure to offset leakage and to make up the gap. The "underestimate" of the capacity of OAs is being eliminated by raising the minimum for 13 out of 35 of the existing OAs which now have increased capacity targets.

The feasibility of this approach should be examined at the FALP EIP.

Housing Supply

Policy 3.3 In this policy for increasing housing supply, it is stated in B that the Mayor will seek to ensure that the housing need is met through provision consistent with at least an annual average of 42,000 net additional homes across London. However, paragraph 3.16b states that **The 2015-2036 figure of 49,000 additional homes a year..... should be regarded as a minimum.**
This difference needs to be considered at the EIP on the FALP.

In section D a the alterations emphasise again over-fulfilling the SHLAA identified capacities, without evaluating the knock-on effects for social and physical infrastructure, services and so on that this policy should have as a basis of decision. This view is argued in the alterations despite the fact that a sound reading of the NPPF must be objective, as in page 97, paragraph 3.42.

In the policy's altered sections E b and E d, there is new reference to town centres and other locations with **good public transport accessibility** for increased housing.

Those centres which are suitable for significant amounts of additional housing should be identified in Annex 2.

There is a need now to consider capacity in the next Housing Capacity Study.
The feasibility of this policy has not been tested. (see also Policy 3.3 E (d) and Policy 2.15 D (c))

Policy 3.5: Quality and design of housing developments

The London Forum considers that the issue of **basement development**, in addition to raising sustainability issues (see comments on Policy 5.3: Sustainable Design and Construction) can have a major impact on gardens.

The London Forum **proposes:**

- Change last sentence of Policy 3.5 A to read:
"Boroughs may in their LDFs introduce a presumption against development on **or under** back gardens or other private residential gardens."
- Amending para 3.33 as follows:

3.33 New housing development should address the wider concerns of this Plan to protect and enhance the environment of London as a whole. New developments should avoid having an adverse impact on sites of European importance for nature conservation either directly or indirectly, including through increased recreation pressure on these sites.

- Amend Para 3.34 as follows:

“Directly and indirectly back gardens play important roles in addressing many of these policy concerns, as well as being a much-cherished part of the London townscape contributing to communities’ sense of place and quality of life. Pressure for new housing **and for extending existing housing, including basements under gardens**, means that they can be threatened by inappropriate development and their loss can cause significant local concern. ...”

New 3.34A **In assessing** new development, **including proposals for basements, boroughs should also take account of** the Plan’s **policies on:**

- design principles (policies 7.2 to 7.12)
- neighbourhoods (Policy 7.1),
- housing choice (Policy 3.8),
- play provision (Policy 3.6),
- sustainable design and construction (Policy 5.3)), as well as those on
- climate change **including retrofitting (Policy 5.4), overheating and cooling (Policy 5.9)**
- flood risk (Policy 5.12) **and sustainable drainage (Policy 5.13), water use and supplies (Policy 5.15)**
- **construction and demolition waste (Policy 5.18)**
- **trees (Policy 7.12), and**
- biodiversity (Policy 7.18/19).
-

This may be better located after para 5.28.

- 3.42 The alterations promote “**higher-density development**” about which London Forum has concerns, as above. However, the text states that development has to be “**in line with Policy 3.4**” and that, reassuringly, requires developments to be “**within the relevant density range shown in Table 3.2.**” and “**Development proposals which compromise this policy should be resisted.**” That policy is significant in determining how the ‘higher’ densities proposed by FALP will be considered and approved.

As above, the basis on which exceptional circumstances are evaluated for the 5% of housing schemes that will be above the sustainable residential quality density matrix maximum for the appropriate density range for the sites on which they are delivered should be reviewed at the EIP of the FALP. There is a danger that such developments would not be sustainable, as required by NPPF in the Ministerial foreword and in paragraphs 14 and 15.

London Forum will expect that policy to be the basis of planning decisions made in future.

London Forum **supports** the following statement by the Assembly’s Planning Committee and will use evidence based on it, should London Forum be invited to participate in the FALP EIP.

“Given London’s population projections, housing need and constrained land supply a policy of optimising the housing potential of sites is a sensible policy response. However there

are suggestions that the resulting intensification of development may have had negative consequences for a number of housing issues. It may have contributed to:

- Increased residential land values - contributing to the high price of housing and social exclusion;
- Reduced the viability and delivery of affordable housing and so undermined creation of mixed and balanced communities;
- Reduced the delivery of family sized homes (that are not suitable for high density development),
- Reduced space standards in market housing for financial viability reasons, and encouraged development above sustainable residential quality standards;
- Encouraged the development of tall buildings and, alongside other London Plan policies, worked against provision of new homes in traditional London streetscapes;”

London Forum points out that the 2011 London Plan sets a target for over 95 per cent of development to comply with the housing density matrix – this remains the target for this Plan. London Plan Monitoring reports show that more than half of all residential units given approval are above the density levels set out in the Plan:

Residential Approvals Compared To The Density Matrix Percentage of Units Approved:

	Within range	Above range	Below range
2006/07	36%	60%	4%
2007/08	40%	55%	5%
2008/09	41%	53%	7%
2009/10	39%	56%	6%
2010/11	37%	58%	5%
2011/12	40%	55%	5%
2012/13	58%	37%	5%

Source: London Plan Annual Monitoring Report 10, March 2014¹

These figures show that new development in London is **not** in accordance with paragraph 3.42 and Table 3.2. FALP indications that densities will continue to rise, particularly in those areas identified as most suitable for development, may not be sustainable as required by the NPPF. The knowledge that the Mayor will allow housing density above that defined as “Sustainable residential quality” (Table 3.2) leads to landowners seeking higher land prices and developers needing to build at higher density with more expensive flats and fewer affordable ones with several bedrooms. They can negotiate on ‘viability’, as suggested to them by DCLG.

Policy 3.8 This policy on housing choice has an alteration to add the requirement in part a1 for boroughs to have in their Local Plan **positive and practical support to sustain the contribution of the Private Rented Sector (PRS) in addressing housing needs and increasing housing delivery.**

¹ https://www.london.gov.uk/sites/default/files/AMR%2010%20FINAL_4.pdf

London Forum **welcomes** this addition, but is concerned by the results of the Assembly's scrutiny of this housing market and the agents that operate within it which identified issues of over charging and sub-standard accommodation.

There should be mayoral policies to introduce controls on this sector to prevent exploitation of people renting. The notes appended to the end of this FALP response are regarding the Mayor's Housing Strategy from a private rented sector discussion about the London Rental Standard. They should be taken into consideration at the EiP.

See note at the end of this document.

Also, Policy 3.10 requires that rented housing "should include provisions to remain at an affordable price for future eligible households..."

The methods need explanation.

- 3.44 This paragraph states that the broad 20-year requirement for additional affordable homes is **25,600 a year** and that "**There is significant**" need for them. In addition, paragraph 3.47 states that "The London SHMA and other evidence shows that failure to provide enough larger homes has seen **the number of overcrowded households in London grow by around 100,000 in the decade to 2011/12**. There is a particular need for social/affordable rented family homes."

London Forum **objects** to this putting together of the terms for two different housing sectors, as in our comment on paragraph 1.30. The delivery of social rented homes is a priority, as described in the Mayor's Housing Strategy which seeks housing that "enables low paid workers, who often deliver the basic services that support the London economy and make the city livable, to live close to their jobs. This reduces travel costs and transport congestion. Further, investment in new homes with low rents for those who need them represents better long-term value for tax payers than meeting the high costs of market housing through housing benefit."

London Plan Policy 3.10 makes it quite clear that there are **three** types of affordable housing. It is **not suitable** in other parts of the Plan to make alterations which **combine** two of them. Social housing is a distinct category of need and identification.

London Forum notes that the altered figures of household income for types of housing in paragraph 3.61 imply that social rented and affordable rented housing should be for those with incomes below £18,000 annually, with intermediate housing meeting the need for those on higher incomes.

- 3.50 London Forum **welcomes** the alterations in this paragraph and in paragraphs 3.50a to 3.50e, 3.53a, 3.53b and 3.57B for specialist housing and the emphasis on suitable homes for those living longer which has shown a large increase in numbers.

However, as in paragraph 3.50a, **Most older Londoners are likely to prefer to remain in their own homes, and some will require support to enable them to do so.**

It is crucial that space remains available in their 'lifetime homes' for friends, family and carers to stay if and when necessary without recourse to state aid.

3.54B The alterations remove the intention of the Mayor to investigate how changes to the use Classes Order could support his aims. London Forum **objects** to that alteration, as we think the Mayor should have views and have influence on the Government's proposals for Use Class Orders and associated permitted development rights for offices, shops, farm buildings and warehouses which affect the delivery of the required type of homes, the retention of business premises in the Capital and the viability of town centres.

Affordable housing

3.62 The alterations at the end of this paragraph need interpretation.

Policy 3.11 The alteration for the provision annually of **17,000** more affordable homes per year compares unfavourably with the figure of **26,500** annually in paragraphs 3.44 and 3.64 as a "**requirement**".

London Forum **objects** to this planned shortfall in provision, which is based, as described, on a shortfall of funding. The Government should not apply such restrictions on the funds for social and affordable rented homes which means that London risks driving out the key workers on which its economy depends, as described as a potential problem in the Mayor's Housing Strategy pages 3 and 12.

The FALP is not sound by proposing this low delivery of homes for those on low incomes and a response by the Government to enable adequate provision in future and clearance of the backlog is essential.

3.71 Developers will be required in future to provide **development appraisals to demonstrate that each scheme maximises affordable housing output**. Experience so far in the negotiations by boroughs on such appraisals indicates that some local authorities, with the exception of City of Westminster, which seems to have the right kind of resources, lack the skills to deal with complex build cost calculations and alternative configuration options for reduced cost. London Forum **recommends** that the Mayor issue enhanced guidelines on this subject, beyond those in the Three Dragon's Toolkit, to help borough staff avoid having to concede S.106 and CIL income from developers.

London Forum is **concerned** about the Mayor's recommendation in the alterations to paragraph 3.83a **To facilitate and encourage new development it is important that realistic and sensitive account is taken of its viability when seeking S106 contributions and setting CIL charges**. It risks giving developers the incentive to resist making the financial contributions that are essential for the provision of the necessary infrastructure to match the growth of homes and jobs in London, as covered by Policy 3.16.

The "local and strategic **social infrastructure** needs assessments" required in part B of Policy 3.16 have not been identified well in some boroughs and some do not have a CIL approved schedule. That does not assist in negotiations with developers. **The Mayor should require prompt completion of borough CIL schedules and rates.**

Policy 4.1 has an alteration to **maximise the benefits from new infrastructure to secure sustainable growth and development**. That emphasises the need for clearances of current deficiencies.

These issues should be debated at the EiP.

London's Housing Stock

3.84 London Forum **supports** the alterations to reduce the number of empty homes. See our comments on paragraph 2.31 above.

3.85a Alterations for bringing forward housing delivery on '**stalled**' sites is **supported strongly** by London Forum. However, we think that the Mayor should be given **more powers** by Government to make it happen.

The level of developer profit should be no more than that which is appropriate for the scale and nature of the development. It should be calculated, taking into account the provision of the highest standards and the meeting of environmental concerns, so that suitable and viable lifetime homes are provided.

See our quote against paragraph 3.42 above from the Assembly's concerns about the way higher density housing reduces developer viability unless there is the provision of homes most Londoners could not afford and the removal from developments of the affordable homes needed.

Social infrastructure

Policy 3.16 B: London Forum **strongly supports** the application of a sequential approach for releasing surplus social infrastructure, but the policy for LDFs at E needs to be more explicit. It should be:

E Boroughs should ensure that adequate social infrastructure provision is made to support new developments. If the current use of a facility is no longer needed, boroughs should **apply the following sequence:**

- **protect land and/or buildings where the current use is or the last use was a social infrastructure use, for re-use for the same, similar or related use,**
- **permit the change of use of land and/or buildings where the current use is or last use was a social infrastructure use from one social infrastructure use to another social infrastructure use which predominantly serves the local community.**

3.86 The list of local social and community facilities needs to be extended to support lifetime neighbourhoods, including **post offices, GP surgeries, pubs, petrol stations**, etc. Rewrite second sentence as:

"At a more local level, other facilities may need to be provided **to support lifetime neighbourhoods**, including **local open space, play and** informal recreation facilities (Policy 3.6), **places to meet and accessible local facilities, such as GP surgeries,**

post offices, pubs (Policy 7.1), and public toilets, drinking water fountains and seating (Policy 7.5).”

3.87A The London Forum considers this paragraph to be **misguided and dangerous** as it “opens the door” to easier disposal of the assets of the social infrastructure. The London Forum advocates a sequential approach to disposal as set out above. A higher threshold is required.

The emphasis must be on the words **continued delivery of social infrastructure and related services**. Therefore, the **reprovision** must be **before local demands on it are allowed to increase**. This paragraph may need to be broadened to reflect the changes to Policy 3.16 B above.

3.88 The altered methodology for increasing social infrastructure delivery is **supported** by London Forum, but **the approach is strategic and should be part of section E of Policy 3.16 – see comments above. It also needs to be adapted to reflect local needs.**

Policy 3.17 Health and social care facilities

3.94A NHS property must remain within the public domain whilst it serves a required function. Its continued availability to the community and the neighbourhood as a medical or other asset of community value must be properly assured. It should be a requirement in the London Plan that **the need for the NHS property must be fully tested before its disposal for housing – see proposed sequential approach in Policy 3.16 E above.**

Only if NHS property is not need for health uses, the first option as housing should be housing for NHS staff, preferably as affordable housing. There needs to be a clear sequential approach to the disposal of NHS property as in our proposed changes to Policy 3.16 B above.

Policy 3.18 Education Facilities:

Alterations to this policy have introduced the Mayor’s support for free schools.

London Forum expects the Mayor to apply the new policy in **G - Development proposals that co-locate schools with housing should be encouraged in order to maximise land use and reduce costs**. It was reported that in one case he has over-ruled a local authority which had refused a free school application because of its unsuitable location with regard to need for particular type of school places.

3.102 London Forum **welcomes** the new Atlas of **both existing patterns of schooling across the Capital, and projections of future changes in the school age population.**

3.111 The new requirement for **the right mix of facilities are in the right places to meet sporting demand** is **supported** but it is strategic and **should be in Policy 3.19.**

Chapter 4 - London's Economy

Economic context

4.4A London Forum **supports** the emphasis on the provision of new infrastructure, as with our comments on housing above.

4.9A The London Enterprise Panel (LEP) is introduced into the London Plan by this new paragraph.

At the end of the last bullet point add **across a broad range of commercial sectors.**

Policy 4.1 The LEP should be covered by a policy section as it is a strategic activity.

The new section a2 needs to be given **more explanation** in a supporting paragraph on how **the benefits from new infrastructure** should be **maximised**.

4.9A At the end of the final bullet point **protect and enhance London's competitiveness** there should be additional words **across a broad range of commercial sectors.**

Policy 4.2 Policy 4.2 A e is **welcomed** as the loss of offices reduces employment prospects, effectively disadvantaging those living locally, as well as reducing the stock of office space for new business or the expansion of existing ones.

At the end of Policy 4.2 e add **and act appropriately to mitigate evidence of detrimental impact.**

4.11 London Forum is **concerned** that this needs updating for the 2012 London Office Policy Review (Ramidus Consulting Limited, September 2012), which identifies the period from 2009 to 2012 as a period in which there was considerable change in employment densities as both the private and public sectors sought to economise on space and change working patterns. The net result of which is that their latest central estimate office occupation densities for new offices, reflecting a period of rapid change since 2009, is a central assumption of 10.8sqm/worker (net) or 12sqm/worker (gross) and a net:gross ratio of 79%. This has implications for the forecast demand for new offices. This needs updating. **Para 4.11 and table 4.1 will need revision to show a lower estimate for a new office space requirements.** The London Forum does not understand why the latest data from the 2012 London Office Policy Review have not been used since it was commissioned by the GLA.

4.13A The London Forum **supports** the commitment to monitoring the impact of the Government's changes to permitted development rights that allow offices to change use to housing. This should be reported annually in the London Plan Monitoring Report.

Policy 4.3 Mixed-use development offices

London Forum **strongly supports** the provision of small-scale offices, but does not consider that 500sqm would be a small-scale office – at 12sqm/worker (gross) this would accommodate up to 42 employees. Small offices, for which there is great demand in the CAZ, would usually be smaller than 100sqm.

The London Forum **strongly supports** the re-provision of offices lost through redevelopment, but considers the policy at B d to be meaningless, unimplementable, ineffective and unsound. The London Forum proposes that **to make a proportionate contribution to provision of new** be deleted and replaced by **to re-provide the the same amount of ..** This would be consistent with the Mayor's successful bid for an exemption for the CAZ from the changes in permitted development rights to allow offices to turn into housing, subject only to prior approval.

- 4.15 This paragraph needs rewriting since housing values are higher than office values almost everywhere, even in the CAZ, and any question of subsidy will not be offices subsidising housing. The whole thesis of the paragraph is wrong – see new paragraph 4.17A.

Rewrite this paragraph.

- 4.17A The London Forum **strongly supports** the need to provide protection for smaller-scale, affordable office space for key economic sectors within the CAZ.

Policy 4.4 Managing industrial land and premises

Map 4.1 as altered indicates the boroughs in which the release of industrial land to other uses is restricted. Paragraph 4.21 now shows a smaller quantity for annual net release than in the 2011 London Plan. The strategic intention to “plan, monitor and manage release of surplus industrial land” in part A b of Policy 4.4 seems to have failed, as the GLA has stated that the release of industrial land has been more than it should have been.

London Forum **proposes** that these alterations and recent evidence require a **'Planning Decisions' section to be added to Policy 4.4 to require better control by boroughs of industrial land release.** It would include the additional requirement added to paragraph 4.23 for the location of such land - **focused around public transport nodes.**

- 4.23 Replace the words **higher density redevelopment** with **redevelopment at densities appropriate to the location (see Table 3.2)** The use of **higher density** is meaningless.

At the end of the paragraph, for meeting wider town centre objectives, add the words **including as a focus for local employment.**

Policy 4.7 Retail and town centre development

Change **commercial** to **offices** in 4.7 B b in line with the para 23 of the NPPF – offices are a main town centre use (ie town centres are a preferred location for such activities) to which the sequential approach applies. This needs clarification.

In C a change **and other commercial** to **, offices and leisure** in line with para 23 of the NPPF.

- 4.42B The London Forum **welcomes** the approach to dealing with prior approval applications for change of use from retail to housing, especially considering the likely impact on the vitality and viability of the relevant centre. Insert the word **likely** before **impact** in line 13, and

change the order of the words after it to **on the vitality and viability of the centre, design,...** Note that the burden of proof is not to prove harm but the likelihood of it.

Policy 4.8 Supporting a successful and diverse retail sector and related facilities and services

The London Forum **strongly supports** Policy 4.8 B g for managing clusters of uses and for increasing “linked trips”

4.48a The London Forum **strongly supports** the expression of support for the important role of pubs. However, the paragraph needs rewriting as:

The Mayor recognises the important role that London's public houses play in the social fabric of local communities. The importance of pubs as a “hub” or meeting place is recognised in the NPPF and is a vital ingredient for Lifetime Neighbourhoods (Policy 7.1). As a result of the rapid rate of closures over the past decade, boroughs are encouraged to bring forward policies to maintain, manage and enhance public houses.

What is really needed is a policy – this could be Policy 4.8 B h, as well as in Policy 7.1.

4.50A The London Forum **strongly supports** the promotion of clusters but would add to the example in lines 9/10 by adding **cultural and tourism** after **leisure**. The London Forum also **supports** greater control over clusters of uses which can have a negative effect, such as betting shops and hot food take-aways, but would add **estate agents** to the list as these too reduce the vitality and viability of the shopping offer of a centre, particularly local centres.

New and emerging economic sectors

Policy 4.10: New and emerging economic sectors

The London Forum **supports** the alterations to 4.10 A c and 4.10 A f which respectively emphasise the availability of start-up space and support the TMT sectors, subject to the observation that any loss of industrial area would negate this emphasis.

London Forum welcomes the new emphasis on **start-up space, co-working space and ‘grow-on’ space** and the recognition of additional economic sectors

4.55A This is **welcomed** for the support on media production, again provided the needed space has not been lost.

4.60 The additional emphasis added to this paragraph on supporting young Londoners to compete in a globalised economy is welcomed. However, **Policy 4.12 seems not to have been effective** when considering the continuing high number of NEET young people in London. There is a firm link with the failure of the education system to equip them for work and the reduction in the number of technical colleges and skill development centres that could help them.

Chapter 5 - London's Response to Climate Change

Climate Change Mitigation

- 5.9a This text is a new statement of requirement for electricity supplies in the Capital and is **supported**. It is understood that electricity supplies in the Victoria and Oxford Street areas are barely adequate.

The first sentence of this new paragraph identifies it as essential that '*additional* [emphasis added] energy infrastructure required to power a growing London can support low and zero carbon energy supply'. However, new infrastructure will need to be integrated with existing infrastructure, and existing infrastructure will need to be modified where necessary, so that London's overall energy infrastructure can 'accommodate ... decentralised energy across the capital'. That is recognised in the second sentence of the paragraph, albeit as 'the long-term vision', but **the first sentence should be redrafted in order to be consistent with that, and with the challenge posed by the strategic target in Policy 5.1.**

- 5.22a The London Forum **supports** this alteration. 'Demand side management' enables non-essential equipment to be turned off or to operate at a lower capacity to respond to the wider availability of energy in the network. The planning system is not the major influence on the use of demand side management, but demand side management is a significant factor in the overall picture on energy, and its contribution is acknowledged in paragraph A of new Policy 5.4A. **This paragraph should also make it explicit that demand side management is applicable to both electricity and gas, and also to heat networks.**

Policy 5.2 must be updated to help to achieve the demand side management through conditions applied on approved developments.

Policy 5.3: Sustainable Design and Construction

The London Forum considers that the London Plan should support London boroughs in tackling the threat from basement development. The Housing SPG, para 1.2.25, says:

"Where subterranean extensions to existing dwellings pose planning policy (as opposed to enforcement/regulation) issues, boroughs are advised to consider the bearing of such development on London Plan policies addressing sustainable design and construction (5.3), retrofitting (5.4), overheating and cooling (5.9), flood risk (5.12), sustainable drainage (5.13), construction and demolition waste (5.18), water use and supplies (5.15), trees (7.12) and biodiversity (7.18/19)."

The London Forum considers that this issue should be dealt with primarily under this policy – it is a sustainability issue – but have also suggested that it is mentioned in Policy 3.5 as an issue that undermines the London Plan's policy for gardens.

The London Forum **proposes:**

- amend Policy 5.3 D to read:

“Within LDFs Boroughs should consider the need to develop more detailed policies and proposals **both for new construction and for extensions, especially basements**, based on the sustainable design principles

- adding a paragraph after para 5.28 on the sustainability challenges posed by basements. (see also our proposals for amending Policy 3.5 and para 3.33.)

Policy 5.4A Electricity and gas supply

- Policy 5.4A The London Forum **supports** this important new policy, and
- **acknowledges** the need for additional energy infrastructure s to accommodate the anticipated levels of growth in London;
 - **endorses** the need for forecasting of requirements to ‘take into account the opportunities and impacts of decentralised energy and demand management measures’; and
 - **welcomes** the emphasis on the desirability of early discussions between developers, boroughs and energy companies.

London Forum is **concerned**, however, about giving an unqualified commitment (paragraph C of new Policy 5.4A) that the Mayor will support development proposals for gas and electricity infrastructure.

5.31A-5.31H We are all the more concerned on this latter point because of the references (justified as they may be in themselves) to ‘strategic provision of electricity infrastructure in advance of need’ (new paragraph 5.31D) and the identification in advance of land for new electricity distribution infrastructure (new paragraph 5.31E). There might be significant environmental impacts to be assessed in the case of, for example, a proposal for an overhead transmission line or the choice of a site for a gas pressure reduction station (as mentioned in new paragraph 5.31G). Where a borough proposes to allocate a site for new energy infrastructure (as envisaged in paragraph D of new Policy 5.4A) we can assume there would be public consultation before the allocation is made. But we are particularly concerned about the implications of including the new Policy in its present form for cases where the relevant borough has not already allocated a suitable site for the type of infrastructure in question.

New Policy 5.4A and the supporting text should also refer to the need to identify and take into account as appropriate the effects any specific proposals would have on people living nearby, on views from neighbouring areas or on green space.

London Forum also wants to see **a clear declaration in this section of the London Plan about the desirability of placing new energy infrastructure underground wherever possible**. The possibility of future tunnelling for gas and electricity mains should be taken into account when HS2 and Crossrail 2 are planned.

We are concerned about the statement that **The current regulatory framework does not fully address [electricity] demands likely to be generated by London’s distinct levels of growth and density. What is to be done about that regulatory framework?**

The possibility of future tunnelling for gas and electricity mains should be taken into account when HS2 and Crossrail 2 are planned.

5.31D There is a paragraph 5.31D and another 5.31d.

5.31E This paragraph suggests that new development may be constrained by the lack of electricity and gas supplies. In the light of the targets for growth of business and high quantities of housing, **the FALP should identify where in London constraints to development by lack of utility supplies may exist** that were not taken into account in the latest SHLAA.

5.32 **Decentralised Energy Networks:**

London Forum **supports** the principle that waste can be used as a fuel for combined heat and power plants. However, **it needs to be made clear in the Plan that there should not be greater adverse impacts on local air pollution as a result of using waste in place of other fuels.** It is important that the new emission performance standards and carbon intensity floor measures proposed in 5.17 are enforced for energy to waste plants so there is confidence in the low carbon nature of the energy supply. In addition, it is essential that infrastructure is in place to manage the supply of fuel such as waste to plants, and that consultations are put in place to ensure public acceptance of such technologies.

Climate Change Adaptation

5.55 The statements and requirements in this paragraph for protection of London from flooding are strategic, yet no alterations have been made to Policy 5.12 in order to support the safeguarding of land and the setting back of development.

The sections of the policy must be amended to cover the new actions required.

5.57 The new understanding of surface water flood risk needs more attention by boroughs to ensuring developers implement sustainable urban drainage and use permeable surfaces where suitable. **Policy 5.13 needs amendment to require boroughs to place conditions on planning approvals to achieve the methods described in its part A.**

5.66 The London Forum **supports** the statement that London's waste is potentially a valuable resource that should be exploited for London's benefit.

5.67 The London Forum **supports** the statement that reducing waste, boosting reuse and recycling performance could deliver environmental and economic benefits. London is still a long way behind the rest of the UK in its recycling performance. Provided the energy from waste is low-carbon the London Forum accepts that generating energy from non-recyclable waste will deliver environmental and economic benefits to London.

It is not acceptable that London continues to export its waste overseas indefinitely and this is recognised in 5.67. However a time limit should be inserted into this policy statement to incentivise market development to a known time line.

Waste

Policy 5.16: Waste Self sufficiency:

The London Forum **welcomes and supports** the reduction from 2031 to 2026 in para A and **supports** the earlier targets for waste self-sufficiency.

5.69 The London Forum **supports** the pressure from the Mayor for boroughs to go further and faster in their recycling rates. London still falls a long way behind much of the UK. With

WRAP showing 85% of household waste is recyclable London is still sending 56% of household waste to landfill at a rising cost to London's taxpayers. This makes the strategic aim of zero waste to landfill by 2026 more than challenging.

Policy 5.17: Waste Capacity

London Forum **welcomes** the focus on climate change in waste management practices and the changes to Policy 5.17 to strengthen and clarify the carbon outcome of energy produced from London's waste. We commend the move towards carbon-based outcomes and away from tonnage-based targets; and acknowledge that the introduction of an emissions performance standard (EPS) and the carbon intensity floor are innovative approaches to the way London seeks to manage its waste in the future. The changes to the Policy will ensure that London's waste authorities will receive a clear message about the direction of policy, whilst recognising the continuing national performance framework of weight-based targets which waste authorities have to meet.

London Forum welcomes the requirement that waste to energy facilities should be equipped with a heat off-take from the outset, such that a future heat demand can be supplied without the need to modify the heat producing plant. It is important that strategic decisions are taken to support the policy to deliver heat networks.

5.85 The changes to Policy 5.17 to strengthen and clarify the carbon outcome of energy produced from London's waste are welcome.

London Forum commends the move towards carbon-based outcomes and acknowledges that the introduction of an emissions performance standard (EPS) and the carbon intensity floor are innovative approaches to the way London seeks to manage its waste in the future.

London Forum also welcomes the focus on climate change in waste management practices and supports a move away from tonnage-based targets towards carbon-based outcomes.

The changes to the Policy ensures London's waste authorities receive a clear message in terms of direction of policy, whilst recognising the continuing national performance framework of weight-based targets which waste authorities have to meet.

London Forum welcomes the requirement that Waste to energy facilities should be equipped with a heat off-take from the outset such that a future heat demand can be supplied without the need to modify the heat producing plant. It is important that strategic decisions are taken to support the policy to deliver heat networks.

Hazardous Waste

5.89A/5.89 The updating of figures on hazardous waste shows that London faces a considerable challenge. The changes in the definition of hazardous waste also increase the problem. London Forum **welcomes** the commitment by the Mayor to work to monitor the capacity of waste facilities (including landfills) used to manage London's hazardous waste and identify opportunities for new treatment capacity in London. **These paragraphs should be expanded to encourage more to be done by way of collection and reuse/repair of WEEE items than is currently done in Boroughs.**

Aggregates

5.94 This paragraph introduces an important new requirement on boroughs for concrete batching.

That should be added to Policy 5.20 LDF section in F or in a new Planning Decisions section (as it is similar to safeguarding wharves as in F b).

5.94A

The London Forum **agrees** with the Mayor that it does not seem reasonable to require all London Boroughs to prepare an annual Local Aggregates Assessment (LAA).

Chapter 6 - London's Transport

Integrating transport and development

Table 6.1 [Note that the version of this table in the full text gives the altered version with no indication of the actual alterations. This was provided in a separate set of 5 sheets which accompanied the full paper version. The following comments give the page number from the full version, plus the name of the scheme.]

Rail. Need for a footnote to explain the terms CP4, CP5 and tph.

Bus. The London Forum supports the proposed alterations, subject to the following clarifications:

- Bus stop accessibility programme: It would be helpful to know the current % of stops which are accessible.
- Bus Reliability: The meaning of (annualised scheme) is unclear.

Cycling The London Forum supports the proposed alterations to promote cycling, including the provision of routes through green spaces (Greenways). However, this should be qualified by the need to avoid conflict with existing users, and damage to the environment.

The list of new measures should also include an investigation as to the most effective means of reducing conflict between pedestrians and cyclists. This is desirable in itself, but also to avoid an increasing number of people coming to oppose the promotion of cycling because of what is considered the inconsiderate behaviour of a small minority.

Road

- Enhanced safety features: explanatory footnotes required re: [Dutch style roundabouts](#) and [Early start traffic signal technology](#).
- Greener Streets: Needs to clarify whether the [Euro IV and NOx standard](#) will apply to all, or just new, buses.
- Better Crossings: There is a need to publicise the interpretation of the time left on [pedestrian countdown units](#), as well as to ensure that the total time from start of countdown gives plenty of time for less mobile pedestrians.
- Further Gyratory,..: Need to retain proposed deletion of "improve facilities and conditions for pedestrians and cyclists.."

Other - Changing behaviour: Should indicate that, following [projects to determine how and when deliveries are made](#), the intention is to bring forward specific proposals for changing behaviour.

At the bottom of page 208 the complex web site addresses for TfL documents should be shortened by bitly.com or some other means for ease of use.

6.13 Replace 'only occur' by **occur only**

Connecting London

Policy 6.4: **Enhancing London's public transport connectivity:**

The introduction to section B indicates that it relates to public transport, yet subsection d, [providing new river crossings](#), as described in paragraph 6.20, relates primarily to private transport, so should be in a separate section. It should also reflect the reasons for the welcome decision by the Mayor to abandon the flawed Thames Gateway crossing, as well as the need to reduce air pollution by the addition of the words **provided they do not generate additional traffic, other than by public transport, walking, cycling or freight by rail, and also**

contribute to the required reduction in emissions of carbon and local air pollutants.

More generally on the topic of air quality, given the need for a consistent approach throughout the London Plan on the importance of reducing the levels of air pollutants, London Forum suggests that this to be considered at the EiP – maybe under policy 7.14

There should also be a corresponding comment in:

- 6.20 the text prior to the bullet points should end "...and, so long as they can be designed to also contribute to the reduction in emissions of carbon dioxide and local air pollutants, will include:"
- 6.38 As well as promoting high standards for walking networks within new developments, they should also contribute to the wider network. The end of this paragraph should therefore read "...**accessible and enjoyable, and should also enhance the wider local network.**"
- 6.18A London Forum believes that this has been tackled in the **wrong order** and that, having settled on a route and safeguarded it many years ago, it was inappropriate to consult on two options neither of which replicated the safeguarded route. **There is insufficient capacity for local journeys within London, and while building to cater for a regional option at some time in the future may be justified, the London Plan should focus on London's needs which are a north-east to south-west service interchanging with each of the local rail and tube lines it crosses.** If additional capacity were to be swallowed up by the number of people travelling longer distances to work, it would represent poor value for money.
- 6.19 The HS2 link to HS1 was axed by Transport Secretary Patrick McLoughlin on 17th March 2014. London Forum finds it disappointing that the text reports government policy rather than setting out a London agenda. In particular, it should acknowledge the potential conflict with objectives outlined in Chapter 3 of the London Plan (housing requirements) if swathes of public housing were to be lost in the Euston station area. We suggest adding the words **The Mayor will develop plans to ensure that enhancing rail capacity is not at the expense of meeting London's housing needs, and will develop proposals for the Opportunity Area that Old Oak Common has become.** **There should be** a cross reference to paragraph 2.60.
- 6.29 The new text again reports the work of an outside agency, but fails to mention that the Davies Commission has already ruled out expansion at Stansted on the grounds that its full capacity is not currently utilised.

The Mayor believes that Stansted is more suitable than Heathrow as a London hub airport. The London Plan should include, therefore, a commitment to investigate why capacity at Stansted is under-utilised and its poor transport links to central London and how these might be addressed. The London Forum suggests the words **The Mayor will monitor its progress and bring forward further alterations to this Plan as necessary** are replaced by **The Davies Commission has discounted the option of making Stansted the London hub because its capacity is not fully utilised. Stansted is closer to London's financial centre than Heathrow but has poor transport links. The Mayor will develop proposals to address this weakness and will seek to**

demonstrate that they represent better value for money and less noise impact than further expansion of Heathrow.

- Policy 6.9 The text in section B a should be expanded to make clear that **cycle parking facilities should be convenient to pedestrians** as well as to cyclists utilising them.
- 6.34A London Forum believes it is **wrong** to look at cycling in isolation and suggests the addition of the words **and pedestrians** after **of cyclists**.
- 6.39 London Forum **welcomes** the changes insofar as they represent an improvement on the existing text, but unless a hierarchy is restored making clear that walking takes priority, the "broad approach" of smoothing traffic flow will result in higher maximum speeds and a failure to meet targets for reduction in road traffic accidents. **There should be a section in this chapter on road safety and a clearer indication that pedestrian safety is an absolute priority in managing traffic and the road network.**
- Policy 6.12 Because of the points above this policy should be altered so that **B e should head the list and become B a.**
- 6.40 London Forum **welcomes** this additional text on the railways impact on roads.

Parking

- Policy 6.13 London Forum **objects** to the proposed change in C which excessively weakens the current policy on parking. With competing need for space, more parking cannot be afforded unless really essential to support business development. The London Forum can see no justification here for weakening the maximum parking standards.

Parking Addendum

Table 6.2 on page 230 encourages the provision of more parking spaces in residential developments, to which London Forum **objects** yet in paragraph 6.45 it is stated that the Mayor "**would not want to see unacceptable levels of congestion and pollution**"

The reasons for change should be justified by the Mayor at the FALP EIP.

London Forum therefore suggests that C should read:

"the primary basis for considering planning applications..." and

D d should read:

"need to fully take into account..."

The second item in the subsequent list should then be strengthened to read " – **any** adverse impact on congestion or air quality"

- 6.45 If the growth in housing planned by the Mayor were to be achieved, Outer London would have to adopt similar policies to Inner London for **a restraint-based approach**. The parking policy should reflect faith in the Plan as it relates to housing, and should be preparing for that eventuality and be consistent with the Policy 6.1 A a requirement for

encouraging patterns and nodes of development that reduce the need to travel, especially by car. That would then mean the London Plan is in general conformity to the NPPF paragraph 35.

London Forum **welcomes** the additional text relating to Inner London.

Policy 6.14 Bb Extend the suggested alteration to read "...**minimise congestion impacts and safety.**"

Parking Addendum:

6A.13 Consistent with the comments on policy 6.9 London Forum proposes the **addition** of the words **without inconvenience to pedestrians** after the words **convenient and readily accessible** on page 233.

Chapter 7 - London's Living Spaces and Places

Place Shaping

Policy 7.1 London Forum **supports** the alterations requiring boroughs in their LDF (Local Plan) to create and develop neighbourhoods and the content of the new paragraph 7.4A and the alterations to paragraph 7.4, 7.6 and 7.6B.

However, this does not fully embrace the NPPF's emphasis (see Paras 69 and 70) on the range of facilities and opportunities for meeting through strong neighbourhood centres and active street frontages. The three principles in para 7.4A are too generic and require a stronger vision to paint a picture of neighbourhoods as places, as well as provide examples of what the essential ingredients are. There needs to be a reference to the elements on which communities can build – **the neighbourhood centre, the pubs, places of worship**, etc – see para 70 of the NPPF, which provides the basis for positive planning to deliver the social, recreational and cultural facilities and services a community needs.

The alterations in this section fail to provide the vision or inspiration to deliver "a city of diverse, strong, secure and accessible neighbourhoods". It needs to recognise that **communities need a focus, such as a neighbourhood centre**. What is described has no sense of place.

London Forum will propose further changes to Policy 7.1 and paras 7.4A and 7.4 to provide more of a sense of place to the text.

7.6B Add at the end of the paragraph **Boroughs should give support to communities seeking to register Assets of Community Value**.

Footnote 219 needs the complex web site address to be **shortened** using bitly.com or some other means for ease of use.

Line 13: After "save valued local amenities" add "**such as pubs**".

Public Realm

Policy 7.5. D It is worth noting that garden land, where it serves to enhance the character of the public realm (eg enclosed land abutting the highway containing specimen trees) is, by definition, private open space, not accessible to all, but nevertheless an important contributor to local character. This aspect is noted in Para.7.16, but should preferably be referred to directly in Policy 7.5.

7.16 London Forum **supports** the inclusion of the words **Managed public spaces in new development should offer the highest level of public access**. However, that should be extended by the words **and be proportional in area to the size and density of the development**.

Policy 7.7 Location and design of tall and large buildings

Policy 7.7: No alterations are proposed here but we remain concerned that the Deputy Mayor for Policy and Planning is quoted (Guardian 13 March 2014, page 9) as saying:

“The key issue in any discussion of London’s skyline is whether a building makes a positive contribution to London’s urban realm, protecting the things we value about our city while helping us meet the challenges of growth and ensuring the continued prosperity of London and Londoners”

London Forum **urges** the Mayor to amend Policy 7.7A to reflect this, by replacing “Tall and Large buildings should not have an unacceptably harmful impact on their surroundings” with **Tall and large buildings should make a positive contribution to a coherent public realm, streetscape and to London’s views, vistas and skyline.**

The contrast between Policy 7.6A on architecture generally and Policy 7.7A on tall and large buildings suggests that the latter have to meet a much lower test of not having “an unacceptably harmful impact” rather than “make a positive contribution”. The policy should say what it is trying to achieve – a positive contribution – not merely what should be avoided.

Since the issue of tall buildings has been lifted up the agenda by the current New London Architecture exhibition (which runs to June), Policy 7.7 needs to be brought into line with what the Deputy Mayor believes the GLA’s policy to be and which we would **strongly support.**

Historic environment and landscapes

Policy 7.8/7.9 There are no changes proposed to Policy 7.8.-Heritage assets and archaeology, or to Policy 7.9: Heritage-led regeneration. However, here, as elsewhere, whilst the policies are consistent with the provisions of the NPPF and the recently issued NPPG, the terminology is at variance with the wording of the relevant provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 (ie sections 16 (1), and 71 (1))

Policy 7.10 World Heritage Sites: The Mayor’s SPG on World Heritage Sites which it is stated is published does not appear in the list of documents at: -
<http://www.london.gov.uk/priorities/planning/supplementary-planning-guidance>

7.36 London Forum **supports** the aim to **assess the effects of development proposals and proposals for change through plan making on the setting of the World Heritage Sites.**

Several developments have been allowed or are proposed which harm the setting or are contrary to the protected viewing corridors for the World Heritage Sites of the Palace of Westminster, St Paul’s Cathedral and the Royal Botanical Gardens, Kew.

The Mayor should not risk the delisting by UNESCO of London’s World Heritage Site locations and buildings.

See note on World Heritage Sites in Annex to this representation.

Policy 7.14: Air Quality (and paragraphs 7.47-7.51)

Although the Mayor has not himself proposed any amendments to the section of the Plan dealing with air quality the London Forum contends that a strengthening of the policies on air quality is an essential and urgent consequence of the core policies represented by the Mayor's own proposed amendments to the Plan.

The projected growth of population and employment in London can be expected to have a damaging effect on what is already an unacceptable and illegal level of air pollution in London. To avert and counter that damaging effect the London Forum urges that the Inspector should recommend an appropriate strengthening of the London Plan's policies on air quality.

London currently fails to meet the EU limit values for nitrogen dioxide by 2015, which is currently subject to infringement proceedings; and it may well not sustain meeting the EU limit values for PM 10. The Mayor was committed to working towards meeting the limit for particulates by 2011 and the limit for nitrogen dioxide by 2015 (paragraph 7.47). Without further action EU limit values for nitrogen dioxide will certainly not be met; and sustaining PM 10 compliance will be at significant risk. For these reasons it is surprising that no amendments are proposed for this section to set out the further action that will be needed.

There are other measures of various types that are being taken or need to be taken in order to reduce air pollution; those are set out in the Mayor's Air Quality Strategy and summarised in paragraphs 7.47 and 7.48 of the London Plan. The planning system also has a crucial role to play.

Policy 7.14 of the London Plan, Improving Air Quality, provides among other things that 'Development proposals should be at least 'air quality neutral' and not lead to further deterioration of existing poor air quality...' (paragraph Bc of Policy 7.14). This principle of air quality neutrality is deliberately stronger (in recognition of the severity of London's problems) than the corresponding passage in NPPF, which sees the role of the planning system as 'preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of ... air ... pollution' (paragraph 109) and requires that 'Planning decisions should ensure that any new development in Air Quality Management Areas is consistent with the local air quality action plan' (paragraph 124).

However, there is no provision for implementation of the principle of air quality neutrality. There is no mention of the Mayor's responsibility for major developments and no reference to the inclusion of that principle in Local Plans. There should also be a reference in the London Plan to the guidance on interpretation and application of the principle of air quality neutrality that will be published shortly in the Mayor's Supplementary Planning Guidance on Sustainable Design and Construction.

The increased relevance of air quality for planning decisions is reflected in some amendments elsewhere in the London Plan: namely the insertion of a reference to tackling air quality in paragraph E of Policy 8.2, Planning Obligations and the insertion in paragraph 8.13 of a reference to 'the improvement of air quality'. Although this recognition of the potential role of section 106 agreements in improving air quality is welcome, that is very much a secondary consideration by comparison with the need to strengthen the policies that will govern the determination of planning applications.

Noise

Policy 7.15 Reducing and Managing Noise, Improving and Enhancing the Acoustic Environment and promoting appropriate soundscapes

London Forum **objects** to the proposed alterations. The altered text would make the aim to manage noise rather than reduce it. The opening words of paragraph B should be amended to refer to **reduce and manage**. This will make it consistent with paragraph A.

The adding of 'appropriate' to 'soundscapes' in the title of Policy 7.15 (*cf.* sub-paragraph Bc) adds a degree of uncertainty - appropriate to whom and when? It needs further explanation.

What would now become sub-paragraph Bb would introduce two new limitations: mitigation and minimisation of impacts of noise associated with new development

- must not place 'unreasonable restrictions on development'
- must not add 'unduly to the costs and administrative burdens of business'.

The accompanying text does not provide any justification for introducing those limitations and they are not acceptable. They are not present in the section of the National Planning Policy Framework which deals with noise (paragraph 123). NPPF does admittedly contain a reference to 'unreasonable restrictions', but only in the different and very specific context of 'existing businesses wanting to develop in continuance of their business' which might be prevented from doing so 'because of changes in nearby land uses since they were established'. These limitations, on the other hand, would apply generally.

London Forum is **concerned** that this policy has slipped from requiring noise abatement to noise management. The adding of **APPROPRIATE** to soundscapes in the description of the policy adds a degree of uncertainty - appropriate to whom and when?

It needs further explanation.

In part B a London Forum **objects** to the inclusion of the word **significant**. Any adverse impact on health is unacceptable.

London Forum **objects** to the wording in part B b at the top of page 259 which allows developers to play the 'not viable' card which DCLG has suggested they should use to avoid obligations, contributions and conditions, if they claim the costs of them would reduce their profits. If a developer wishes to place housing units near to working wharves or businesses in industrial areas where there is some noise, it is not conducive to creating sustainable communities as required by the London Plan policies and the Mayor's guidance. It can harm the continuation of those businesses and have an adverse effect on the local economy. If it is a new business that creates noise that could affect existing residents nearby, permission should be refused.

The words **without placing unreasonable restrictions on development or adding unduly to the costs and administrative burdens of business** should be **removed**.

Some recognition of the physical impact on buildings of high sound levels would be useful.

The web site address for the footnote 248 on page 261 should be shortened, as above.

Protecting London's open and natural environment

Policy 7.18 Protecting Public Open Space and addressing deficiency

Policy 7.18 Line 3 of 7.18C a: The word **publically** should be **publicly**. However, London Forum **objects** to inserting the word 'publicly'. (See our comments on Policy 2.18 above in relation to "open space"). The Mayor should explain the effect of the change being made and why. Open spaces which are not publicly accessible (or only occasionally so - e.g. London squares and those that are open for organised visits or during London Open House days) are of value to the public in many ways and can be better for wildlife and protected habitats. So too can private gardens for similar reasons and for their positive environmental impact, prevention of water run-off and the lessening of air pollution and noise.

The alteration would have the effect of normalising in-fill building which is contrary to environmental best practice as shown elsewhere.

7.58 Local green space should specifically include private open space (eg garden land, green squares etc.) where these elements contribute positively to local character, often, for instance, in adding peripheral quality as part of the setting of the public realm.

7.58A London Forum **support** the identification of Local Green Spaces.

Policy 7.21: Trees and Woodlands

Policy 7.21 London Forum **objects** to yet another alteration, in part A, which removes reference to open space. The alteration should be changed to **This should be linked to the strategy in each borough for open space and green infrastructure.**

Burial Spaces

Policy 7.23 London Forum **supports** the alteration promoting re-use of burial land and the new wording in paragraph 7.68.

In addition, the following words should be added after **...offers them. They should encourage also the reuse of church gardens which are sometimes extensive and usable for commemoration plaques and caskets after cremations.**

Blue Ribbon Network

7.73 London Forum **welcomes** the alteration for additional piers.

It is hoped that the River Action Plan will cover the use of types of passenger craft that are fast enough to satisfy commuters but which do not cause problems by the water turbulence and waves that they create.

If there are to be more piers, peak hour passenger services should omit some of them to reduce the time of journeys.

Travel costs on passenger riverboats should be kept low.

Policy 7.27 London Forum **supports** the addition to the policy in A c for enhancing waterway support infrastructure and the addition of **moorings** in paragraph 7.80 as a part of those facilities.

The requirement in part B for boroughs to enhance or extend facilities should have a **supporting paragraph** to suggest what might be required **in areas where a particular need has been identified**. It could be means of escape from boats where there are long stretches of river without mooring points or more lifebelts.

The lack of boatyards as in paragraph 7.81 is a problem and the distance away of some specialised ones extends repair and maintenance times for freight and passenger craft.

There are good Thames Landscape Strategies for Hampton to Kew and Kew to Chelsea plus policies for the Thames Gateway but the central London boroughs have not developed strategies for their stretch of the Thames. They have been required to do so by Policy 7.29 part C.

To support the alterations in Policy 7.27, an addition should be made to its part B as **Strategies for the central section of the Thames should be prepared by boroughs, in accordance with Policy 7.29 C and paragraph 7.91 to assist this identification of need for improved water infrastructure.**

Policy 7.30 London's Canals and other Rivers and Water-spaces.

London Forum **supports** the intention to make better use of London's rivers, canals and water-spaces, but in highlighting the need to protect and enhance waterway support infrastructure, such as boatyards, moorings, jetties etc. (Policy 7.27 A c), it is important to recognise that the maintenance of traditional riverine uses, both on the banks and in the rivers themselves, is fundamental to preserving the essential character and appearance of areas which may be of great cultural significance to London. This needs to be reflected in Policy 7.30A and in the supporting reasoned justification.

Chapter 8: Implementation, Monitoring and Review

Policy 8.1 London Forum **supports** the alterations to this policy in order to assist implementation of the London Plan.

8.6A It is understood that a Mayoral Development Corporation has been established for the Old Oak Common Opportunity Area. **If so, it should be mentioned in this paragraph.**

8.6B London Forum **supports** the alterations for infrastructure.
There are indications that new developments will be supported by the Mayor that push to the limits conformance with the London Plan policies on density of housing, protected views, tall buildings and context and character. It is essential that decision making takes fully into account the ability of the key elements of infrastructure in Table 8.1 to support that growth.

Policy 8.2 Since the current version of the London Plan was prepared four years ago, the Mayor's undertaking in part A of this policy **should have been fulfilled** to provide guidance on negotiating planning obligations in support of Policy 3.12.

Too many contributions by developers for affordable housing have been conceded and many boroughs lack the skills to review scheme viability with developers.

Planning Obligations and Community Infrastructure Levy

Policy 8.2E London Forum **strongly supports** the substitution of the more inclusive term **social infrastructure** for the list of social provisions, and especially the addition of **air quality**. However, for consistency, air quality should also be included (as well as mitigation of climate change) elsewhere in the Plan, especially in Chapter 6:

Policy 6.1 Ai "...urban realm, **including an improvement in air quality by reducing emissions of local air pollutants**"

Para 6.8 2nd sentence should read "... carbon dioxide **and nitrous oxide** emissions;... ...helping to tackle climate change **and local air pollution.**"

Para 6.14 End with "...contribute to climate change **and local air pollution.**"

Policy 6.12Bb after "any effects", insert ", including on levels of air pollution,"

Appendices

Appendix 1: Opportunity and Intensification Areas

Table A1.1 The additional Opportunity Areas are welcomed. However, some OAPF masterplans and borough expansions of them have not made sufficient progress, yet the quantities of new homes and new jobs have been altered considerably. **The basis for that and the borough acceptance of the targets should be explored at the FALP EiP.**

Tall Buildings: The London Forum **objects** to the “encouragement” given by statements made in these “cameos” for Opportunity Areas that have led from modest sounding statements such as “parts of the area may be suitable for tall buildings subject to London Plan/LDF design policies and criteria” in the current Vauxhall, Nine Elms, Battersea and the resulting development shown at the recent NLA Exhibition. Many of the other tall buildings have been the product of passing references in the earlier versions of the London Plan, such as the 2008 London Plan.

The London Forum **object** to the “proposal” for “a cluster of tall buildings around the interchange” in the new Opportunity Area for Old Oak Common.

Annex 2 - Town Centres:

A2.3: The London Forum **supports** the recognition that town centres contain not only retail floorspace, but also “leisure and service” floorspace. This should be extended to include office floorspace – space for employment, particularly for small and medium-sized businesses. Rewrite as **leisure, office and service**

The London Forum **supports** the recognition in Table A2.1 in the column on “Policy Directions” of centres where regeneration is a priority. There is, however, absolutely no connection between this “policy direction” and the latest “policy direction” to promoting “high-density, housing-led, mixed-use redevelopment in medium-sized centres” (New material in Policy 2.7 h; Policy 2.15 D c; paragraphs 2.72; 2.72E; 2.72F; 2.72F; 3.50c; 3.53a; and 4.42A).

It is not clear whether the scope for redevelopment – as opposed to refurbishment – is there to make a significant contribution to additional housing in these locations and whether this would be at the expense of affordable workspace for small businesses.

There are no new town centres identified for regeneration other than Croydon and King’s Cross/St Pancras CAZ Frontage.

All of this would suggest that the intensification of town centres policy has been an after thought with no assessment of its feasibility, viability, scale of contribution and the likely impact on the local economy – small firms, local employment prospects and, above all, the overall level of economic activity.

Annex 4 - Housing Provision

Table A4.1: Reword the title:

Disaggregated **net annual** housing **supply** targets for monitoring purposes
2015/16 – 2024/25

Additional text about how the **net** additions should be calculated, including losses from deconversion of flats to single-family houses and where newly-built stock does not come into use – eg investment property and “second homes” that are left empty most of the year.

Annex 5 - Specialist Housing for Older People

The London Forum **welcomes** the inclusion of annual targets for specialist housing for older people.

Glossary:

Accessibility: There is confusion here between access and accessibility – where accessibility is about relative ease of/ability to get **to** a facility, such as local services, public transport, jobs, as opposed to access which tends to be ability to get into or ability to take advantage of a facility. Accessibility as in PTALs is the former – see definition of PTALs.

The following is in support of London Forum's comments on Policy 3.8 of the FALP

Notes from discussion on the private rented sector

Participants

Heather Kennedy, Digs, hello@hackneyrenters.org

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Sam Ashton, samashton@zzk.org

Mark Foster, Cardinal Hume Centre, markfoster@cardinalhumecentre.org.uk

Sarah MacFadyen, Crisis, sarah.macfadyen@crisis.org.uk

Robert Taylor, Camden Federation of Private Tenants, rtaylor@cfpt.org.uk

General

We suggest that this section start off with a statistic about the increase in poverty in the private rented sector. This data can be seen here: <http://data.jrf.org.uk/data/poverty-housing-tenure/>

- ∑ The introduction should point to the problems created for renters by welfare reform (LHA caps making most of London unaffordable, discrimination against people on benefits, landlords now evicting renters on benefits). Eric Pickles has said this isn't an issue in England – all the evidence tells us it does.
- ∑ There is a mismatch between the evidence presented and the recommendations made.
- ∑ The strategy makes no mention of social housing which groups find disturbing.

None of the groups had faith the London Rental Standard would be effective because;

- ∑ It's not enforceable.
- ∑ No evidence voluntary regulation of private landlords works in a market which supply so far outstrips demands. Renters don't have enough power to be able to choose between an accredited and non-accredited landlord and those with least resources will suffer the most.
- ∑ The Housing Health and Safety Rating System is very subjective and people don't understand how this operates. Instead enforceable minimum standards are needed.

Real and threatened retaliatory eviction

All groups called for the Mayor to commission evidence into retaliatory eviction. This has been dismissed by the Mayor and other policy makers as a rare occurrence but those working with renters (the participants) saw it very frequently including Crisis and CAB. This questions needs to be answered once and for all.

Employee products

- ∑ Firstly, more clarity needed on what the products would actually be
- ∑ This would only apply to a very small number of people and excludes people in some of the most dire housing need - the unemployed.
- ∑ This policy assumes a stable job market, which isn't what we have. Tying accommodation to a job in the current job climate could be incredibly risky for people.
- ∑ The strategy is silent about dealing with declining wages and rising living costs. A realistic housing strategy needs to offer some analysis of this.
- ∑ This policy, like other suggestions, fiddles with the edges of the housing crisis rather than getting to the heart of why there is so much unmet housing needs and poor quality housing.

'Private sector landlords should consider the use of longer tenancies, tied in with greater certainty over rents, where this is viable.'

- Σ This is ridiculously vague – making this weak assertion without any plans for how this could be achieved (in a PRS where insecurity of tenure and high rents are two of the most significant issues) is totally meaningless.
- Σ Currently the argument that rent stabilisation would sap demand is rolled out without any real evidence. This argument represents a misunderstanding of housing demand and market forces from 25 years ago. Instead of coming back to this same argument, the Mayor should conduct a comprehensive review into different models of rent stabilisation such as those used in Germany and France to explore solutions for dealing with the 'unaffordability crisis' the strategy mentions.

Institutional investment

- Σ The Mayor needs to recognise the PRS is not the tenure of choice for many people living in it. Evidence of PRS not being a lifestyle choice found by Shelter here: http://england.shelter.org.uk/_data/assets/pdf_file/0005/656708/Growing_up_renting.pdf
- Σ Developments are being promoted at the top end of the market and the 'Built-to-Rent' policy is using public money to subsidise the development of properties that are unaffordable to the vast amount of Londoners. This is ignoring the nature of the housing crisis in London.
- Σ Institutional investment could be a good thing if developers were induced to set rent at genuinely affordable levels and with minimum property standards. Otherwise it will push low and middle earners even further out of London. The Mayor should set these stipulations for developers. It could be a stipulation for instance that new homes offer assured rather than assured shorthold tenancies (which offer much less security of tenure and rent). Equally the Mayor could attach such conditions to building on GLA land, for instance that developments would have to have a certain percentage available at LHA level.

Long tenancies ending after 15 years

- Σ Why 15 years? This seems like an arbitrary figure and still very short. This will stop people from investing in their communities. Could the Mayor look at perpetuity?

ANNEX: WORLD HERITAGE SITES

Policy 7.10. World Heritage Sites.

The difference between the existing provisions and the alterations proposed reflects the fact that the Mayor has completed his Supplementary Planning Guidance - 'London's World Heritage Sites - Guidance on Settings' (March 2012), and now seeks to apply its provisions, principally through the medium of local plans. It is important to note, however, that the higher level policy and guidance frameworks (ie NPPF- March 2014, and NPPG - March 2014), with which the Plan has to be consistent, no longer include PPG 15: Planning and the Historic Environment, PPS5: Planning for the Historic Environment, or Circular 07/2009 Protection of World Heritage Sites.

Given current threats to the visual integrity of most of London's WHSs, usually through the development of tall buildings intruding into immediate and wider settings, including long views, it is essential that WHS Steering Groups or Consultative Committees are required as a matter of urgency to define such settings and views, and set out the measures required to manage development adjudged likely to impact adversely on a WHS's Outstanding Universal Value (OUV). The *laissez faire* attitude to the preparation of WHS Management Plans set out in Policy 7.10 D is clearly inappropriate, in the light of the plethora of tall buildings currently proposed throughout London, and the very real possibility that serious damage to the visual integrity of a WHS could result in its inclusion in UNESCO's in danger list, and ultimately a loss of WHS status. For sites with existing Management Plans, the relevant authorities must be pressed to keep them up-to-date and alert to development trends. The Palace of Westminster and Westminster Abbey, including St. Margaret's Church WHS, which is probably the most important of London's WHSs, currently has no defined buffer zone, and the Management Plan (2007) lacks information on the immediate and wider settings, and views into and out of the property. UNESCO's State of Conservation Report in June 2013 picked up on the deficiencies of the Management Plan, and highlighted the World Heritage Committee's frequently reiterated concerns about 'the actual and potential adverse impact of tall buildings on the setting of the property'. The report also noted that both the 'reactive monitoring missions' in 2006 and 2011 had called for a strengthening of the control regimes responsible for 'protecting the immediate and wider setting of the property, which does not have a buffer zone'.

As matters stand at present, the World Heritage Committee has once again (June 2013), urged the Government to ensure that various developments on the South Bank of the Thames are revised to meet the concerns of English Heritage (EH) and others. A strengthening of policy and planning frameworks is also required 'to ensure the adequate protection of the setting of the property, by defining the immediate and wider setting and view cones of the property in relation to its OUV, and by identifying adequate mechanisms within the respective policies of all the relevant planning authorities, to ensure that new constructions do not impact on views and other attributes of the property'. The Government is also urged to refrain from approving any large-scale development in the vicinity of the WHS until measures are in place providing adequate protection of the WHS's immediate and wider settings.

In response, by letter dated 31 January 2014, DCLG/DCMS responded to the World Heritage Centre in much the same terms as previously - arguing that policies had been strengthened by virtue of the NPPF (2012), the NPPG (2014, but then still in draft), 'The Settings of Heritage Assets' (EH 2011), the GLA SPGs 'London View Management Framework' (2011) and 'World Heritage Sites - Guidance on Settings (2012) - providing a robust framework for assessing development proposals. A request to refrain from approving large-scale development, was countered on the grounds that the Government could not prevent the submission of development proposals affecting WHSs, but conceded that the Minister could call in applications for his own decision. Once again, the letter refers to ongoing discussions with stakeholders, led in this instance by Westminster City Council, aimed at defining the immediate setting of the WHS.

The fact remains, however, that the WHS still has no buffer zone (which may not be appropriate

anyway), and repeated requests for better-defined settings and improved control mechanisms have still not elicited any concrete proposals. In the meantime, numerous proposals for tall buildings intruding into the setting of the WHS have been approved and have not been called-in for Ministerial decision.

Following an application for judicial review brought by Westminster City Council and English Heritage against the decision not to call-in an application for two high-rise buildings as part of the redevelopment of Elizabeth House, judgement was reserved on an attempt to quash the Minister's decision not to call-in an application for two high rise buildings proposed as part of the redevelopment of Elizabeth House. The appellants claim that UNESCO have threatened to place the Westminster WHS on its endangered list if the plans are approved. Elizabeth House is only one of a number of developments involving tall buildings, all with potentially adverse impacts on the WHS, and there must therefore be a strong possibility that UNESCO's World Heritage Committee, at its 38th session in 2014, will place the Westminster WHS on its endangered list. This is only one step away from removal from the list altogether, a fate which has so far been imposed on only two of the 962 WHSs in the world.

As already noted above, at the judicial review hearing, the decision of the judge was reserved to a later date; in the last few days, however, the decision has been released. It appears that the Minister's decision is not to be quashed, notwithstanding serious criticism of the contents of the Ministerial letter, which suggests that it is now almost certain that Westminster will be placed on the endangered list later in the year, and unless the situation changes radically in the following 12 months, removal from the WHS list may well follow.

The lesson here for Policy 7.10, and Para. 7.36 in particular, is that the Mayor has to be more proactive about ensuring that developers, policy makers, and other stakeholders actively take up his guidance on settings as part of the Management Plan process. Successive requests from the World Heritage Committee to define the immediate and wider settings of key WHSs, notably The Tower of London and the Palace of Westminster, have been largely ignored. Indeed, the Guidance on Settings SPG (page 89), dealing with the Westminster WHS, notes the lack of a 'coordinator' to carry through the implementation of the key objectives of the WHS Management Plan. Bearing in mind the plethora of tall buildings currently proposed in the vicinity of London's WHSs, continuing inaction will almost certainly elicit serious penalties from the World Heritage Committee and further sully the reputation of the Mayor and the UK Government.