

MONITORING

(a) Would the key performance indicators and measures set out in Table 12.1 ensure that the Plan can be effectively monitored such that the Mayor and others can respond effectively if policies are not delivering the expected outcomes, including those set out in Good Growth policies GG1 to GG6?

To operate effectively, the Plan must have excellent monitoring. Qualitative as well as quantitative indicators are needed. These measures and indicators are insufficient.

The slimmed-down list of KPIs is a major concern: it comprises broad indicators which are not smart enough to capture the reality of what goes on. Where a KPI is too broad or missing, vital indicators requiring a response will not be seen or measured.

A revised set of KPIs should be expanded, made smarter and be more reflective of the Mayor's statutory duties, particularly sustainable development and Good Growth policies, to justify the statement in para 0.0.18. The KPI's must also include fairness and diversity indicators. Good Growth has to be measured. The RSA Commission, for example, recommends establishing inclusive growth as a regular official statistic.

The role of the London Sustainability Development Commission (LSDC) could be larger. See its mention in London Plan IIA SR para 7.5.4.

Community contribution to data for monitoring

The GLA Intelligence Unit could co-ordinate meetings with community groups, keep up with research, engage with think tanks and collate the rich evidence available for use by Plan-makers. This would feed into the Plan and Monitoring, which should not have to involve expensive consultants.

A Mayor's Statement of Community Involvement would formalise the process of listening to Londoners and should be the basis for the Mayor's decision-making along with Londoners, in the first paragraph of the Plan (para 1.0.1).

Ease of use of the Plan

Monitoring is not only Plan-Monitor-Manage methodology and compliance with SEA Regulations, but involves wider democratic accountability, whereby Londoners can participate, enabled by ready access to information.

Therefore each chapter could note its relevant monitoring indicators. Para 12.1.5 states that the AMR is not the only tool to monitor London's performance, however we think all the monitoring indicators should be listed in Chapter 12.

KPIs not carried forward from current plan

Listed under the Chapter 12 topics:

Housing

- 1 Brownfield land use
- 2 Density

Economy

- 7 Increase in working age Londoners
- 9 Employment land availability
- 10 Employment in Outer London
- 11 Increased employment for BAME groups, lone parents on income support
- 17 Jobs in high PTAL areas

Environment

- 3 No net loss of open space
- 16 Increase in Blue Ribbon Network traffic and freight
- 18 No net loss sites of importance for nature conservation
- 19 Waste recycling
- 20 Zero carbon emissions in new development
- 21 Renewable energy
- 22 Urban greening
- 23 Restore rivers and streams

Health

- 6 Life expectancy

Air Quality

- 14 Zero traffic growth

Their omission reduces the effectiveness of the Plan.

Even with those beneficial KPIs added, the important indicators to measure fairness, wellbeing, civil society and sustainability are missing.

Just Space proposes smarter and more detailed KPIs, adding in indicators that will reflect the social impact of the Plan. Research can be seen in our publication

Towards a Community-Led Plan for London

<https://justspacelondon.files.wordpress.com/2013/09/just-space-a4-community-led-london-plan.pdf>

Proposed amendments and additions

1. HOUSING

KPI	Measure
Supply of affordable homes	The number and proportion of homes that are Social Rent or are London Affordable Rent; the proportion of market rent at which these are set; by borough and by development.
	The number and proportion of homes that are London Living Rent and London Shared ownership; by borough and by development.

Reason:

As stated in Hearings, the overall term “affordable” does not reveal the different tenures or products, so it cannot record the success of the policy for “all Londoners” and its equalities impacts. The London Tenants Federation says: *“Many boroughs record the previous Mayor’s ‘capped affordable rent’ and ‘London Affordable Rent’ homes as social rented; [this is] acknowledged in the AMR”*. (Source: p4 link below) *London’s housing targets and 2016/17 delivery - Using data from the 2018 AMR of the London Plan*

<http://www.londontenants.org/publications/reports/2018%20Report%20on%20Housing%20targets%20and%20delivery%20in%20London.pdf>).

Evident from Just Space statements, social rent homes are crucial to the effective addressing of London’s most pressing housing needs which in turn reinforce the beneficial impacts of other policies on health and well-being, social justice and sustainability.

The New Policy Institute, in its March submission to the EiP said: “Our recent report *London Poverty Profile* highlighted that the lack of affordable housing is a big part of the poverty story in London. After accounting for the cost of housing London’s poverty rate almost doubles, rising from the same level as the rest of England to much higher.”

KPI	Measure
Housing density	Densification and housing output type.
	Revised Density Matrix
Small sites	Tenure and occupancy of housing demolished for small sites; replacement by unit and tenure.
Housing standards	Compliance with internal space standards
	Adherence to external playspace / open space standards.

Reasons:

The relationship between density and tenure suggests that as densities rise the number of low-cost family sized dwellings falls.

Daylight, sunlight, children’s play space and many aspects of social infrastructure capacity should all be subject to quantification – either alongside a **revised density matrix** or otherwise tabulated. We are seriously concerned that there will be inadequate guidance for boroughs, widespread inconsistencies between boroughs and confusion for Neighbourhood Planning.

The relaxation of internal space standards is alarming: monitoring is necessary for the enforcement of those standards.

KPI	Measure
Estates redevelopment	Number of social rented homes demolished and re-provided, by Estate
	Number of homes re-provided or built at social rented housing levels as a percentage of the whole, by Estate
	Number of households not re-housed and their re-location, where known.

Reason:

To measure whether Estate Demolition is beneficial for the lowest income groups, in line with Good Growth policy GG1 and the SHMA's requirement for 47% social rented housing.

2. OPPORTUNITY AREAS

KPI	Measure
Opportunity Areas	Annual report, detailing: <ul style="list-style-type: none"> - delivery of social infrastructure; - loss and gain of existing homes and jobs; - consultation processes undertaken and responses; - delivery of affordable and social rent homes targets; - displacement of residents and enterprises.

Reason:

Monitoring the outcomes of OA planning policies is vital and the lack of evidence makes the policy unsound.

3. ECONOMY

KPI	Measure
Employment	Increase working age residents' employment <i>Current plan KPI 7</i>
	Reduce employment rate gap for BAME groups and lone parents <i>Current plan KPI 11</i>
	Growth in employment in outer London <i>Current plan KPI 10</i>
Provision of affordable workspace	Low cost workspace beyond B1. Focus should be on overall quantum and appropriate geography of suitable accommodation types.
Availability of industrial land	No overall net loss of industrial accommodation (floorspace and yards) in London based on a rolling average.
Economic sustainability	Diversity of business sectors (for example in terms of size, number of employees and required floorspace; number of ethnic and migrant businesses).
	Strength of local supply chains (interlinkages between firms, delivery distance, time and cost).
	Gender wage disparities and access to labour market

	(for example a Gender-sensitive Regional Development Index).
	<p>How much of the profits generated by London businesses are:</p> <ul style="list-style-type: none"> —Paid in tax (and of that, how much is returned through central allocation to the GLA and the boroughs). —Re-invested into business (not paid out as dividends and interest). —Spent on wages (and whether this rises as growth goes up, or not). —Distributed through dividends or profits to local community members who own or have invested in local businesses. —Distributed across socio-economic classes.

Reasons:

Wider measurement of London's economies complies with GG5B: to ensure that London's economy diversifies and that the benefits of economic success are shared more equitably across London. Prioritisation of large corporate businesses obscures smaller businesses, and their loss, being measured. See Just Space Economy statements.

4. ENVIRONMENT

KPI	Measure
Open space	No net loss of open space designated for protection in LDFs due to new development. <i>Current plan KPI 7</i>
Biodiversity	No net loss of Sites of Importance for Nature Conservation <i>Current plan KPI 18</i>
Air Quality	Areas of pollution related to population data to identify the impacts and trends.
	Number of schools and health care facilities sited in air pollution hotspots.
	London must be made to meet EU legal limits for NO ₂ by 2020 at the latest — this is the date for the rest of the UK.
	Meet the WHO recommended level for PM ₁₀ air pollutants. New limits for finer particles PM _{2.5}

	needed.
	Car traffic growth reduced to zero <i>Current plan KPI 14</i>
	Travel and transport generated by economic activity (number, distance and cost of work-trips, deliveries, air-travel).
	Increase passengers and freight on Blue Ribbon network <i>Current plan KPI 16</i>
	Restore rivers and streams <i>Current plan KPI 23</i>
Carbon emissions	Carbon emissions in relation to the minimum limit set (using defra data).
Waste	0% to landfill by 2026 <i>Current plan KPI 18</i>
Renewable energy	8550 GW energy from renewables by 2026 <i>Current plan KPI 21</i>
Sustainability	Sustainability of resource use (the capacity of renewable energy equipment installed; amount of non-recycled waste).
	Progress towards sustainable or 'lifetime neighbourhoods' and 'lifetime suburbs' that provide local needs and reduce the need to travel
Food growing and production	Land: amount purposed and amount lost.

Reason: The KPIs do not cover traffic pollution, which is the biggest problem.

Nearly 10,000 Londoners die early every year due to air pollution (including from fine particles and Nitrogen Dioxide or NO₂ making it the biggest environmental cause of premature death). The capital suffers under illegal levels of NO₂ — EU legal limits set to protect health should have been met in 2015 at the very latest, but are not due to be met till 2025 under current plans.

Limits now have to be met in the shortest possible time, following a UK Supreme Court ruling, and all possible measures must now be taken so that our air is cleaned up much sooner.

5. HEALTH

KPI	Measure
Life expectancy	Reduction in difference in life expectancy between those living in the most and least deprived areas of

	London. <i>Current Plan KPI 6</i>
	% of deaths avoidable through good quality health care / public health interventions (using ONS Avoidable Mortality statistics).
Infant mortality	Infant mortality rates including those with protected characteristics.

Reason: To conform with Good Growth policies GG 3 and equality in GG 1.

6. SOCIAL INCLUSION, SOCIAL INFRASTRUCTURE, WELLBEING

KPI	Measure
Wellbeing	Average life satisfaction on scale of 0–10 (using ONS Measuring National Wellbeing survey).
Fairness	Ratio between after-tax incomes of top 10% and bottom 10% of households computed both before and after housing costs (using ONS data on The Effects of 66 Taxes and Benefits on Household Income)
	% of the labour force that has a secure job that pays at least the living wage (using ONS Labour Force Survey Data).
Social infrastructure	A social infrastructure matrix that relates number of housing units to lifetime neighbourhood indicators: amount of green space, number of school spaces, number of GPs, number of community meeting spaces. This should be applied to the Mayor’s Affordable Housing Programme and to all public land transfers.
Loss of social infrastructure	Via Social Impact Assessments.
Civil society	Its development across a range of issues and levels of participation - not just volunteering levels - including the diversity of voices, the degree of achieving impact, levels of trust in authorities. Could make use of the Justmap surveys of London’s community groups.

Policy S1 establishes a needs assessment of social infrastructure, particularly in areas for redevelopment, and its loss. Monitoring of the loss is therefore important in relation to Policy GG1 B, Building Strong and Sustainable Communities with services and amenities.

As we have argued, **Social Impact Assessments**, part of area-based planning, are necessary for capturing the social assets in a local area and can then be used for monitoring.

(b) Should the Plan set out measures that would be taken in the event that monitoring demonstrates that the expected outcomes are not being delivered?

Regarding Housing targets, we suggest the following:

In the event of the Housing targets not being met then the Mayor will:

1. Call in those planning applications referred to him/her to ensure an optimum of housing that accords with housing need and policy.
2. Make it a requirement of receiving housing funds that the borough (planning authority) has met its annual targets;
3. Weight and distribute housing development support funding and housing infrastructure funding in favour of the delivery of social rented homes;
4. Require that for boroughs or areas experiencing persistent and low levels of housing delivery for those in most need, publicly owned land should be used predominantly or exclusively for the delivery of social rented homes;
5. Conduct a full review in response to the outcomes in the first 2 years of the 10 year target period (2019-20 and 2020 -21) with the object of introducing further interventions if necessary to ensure meeting of targets in subsequent years.

