My comments

The draft New London Plan:

- **has moved the London Plan from being a strategic spatial planning document to one that is concerned too much with detailed development management:** the emphasis should be shifted to encouraging the right development in the right places, rather than focusing on the development management criteria for optimising the development of individual housing sites. It should emphasise the sequential approach to targeting places to develop and then apply the design-led approach, informed by character and context, public transport accessibility and capacity and by the capacity and ease of access for communities to a wide range of local services, amenities and social infrastructure.
- **should paint a clearer picture of where development will be encouraged and the type and scale of development proposed to help communities understand what "good growth" would look like.** Optimising the development potential of sites with minimum reference to context and character and accessibility to public transport, town centres and a wide range of services, amenities and social infrastructure, runs the risk of merely optimising density on a site-by-site basis, using design-led approach rather than creating strong and inclusive communities. There seems to be too much emphasis on tall buildings and nothing on finding appropriate building typologies, such as mid-rise mansion blocks or terraced housing, that will be more compatible with the context and character of an area and residents' perceptions of development that complements their neighbourhood.
- **should identify which locations will be targeted, the nature of the change that will be proposed and how this contributes to a more sustainable pattern of development and to promoting strong and inclusive, sustainable communities/neighbourhoods**
- **should indicate how the change to a less car-dependent lifestyle would be facilitated and what it could achieve.** Need to paint a picture of what the preferred locations for higher densities would be like and the opportunities that higher densities and lower car use/ownership might offer in terms of lifestyles for both younger and older people.
- **should have a presumption against presumptions** whilst the small sites policy (H2) will be for the boroughs to operate, and for them to get their own policies in order, it will be seen as a fairly rigid imposition.

- **seeks increased densities 800m round stations (rail and underground – not always consistent (eg Figure 4.3 on page 158) and from a town centre boundary:** There is concern that this will be taken by developers as being able to seek the highest densities over the whole of that area, leading to cliff edge at 800m, rather than density reducing with distance from the station/town centre. We **object** to the 800m from a town centre boundary approach – it is inappropriate for long, straggling centres with a long "tail" of secondary frontages. It should relate to the main centre itself, such as the primary retail frontages.
- should ensure net gain and better quality of green space despite its housing infill policies.
- should prioritise the delivery of homes to rent that people on low incomes can afford.
- requires a lot of skills in boroughs and resources to plan for individual sites and areas that may not be available.
- could meet opposition to its policies for intensification of land use in outer London in Policy H2 unless its design, context and character, historic environment, social infrastructure development and public transport improvement policies are applied fully in decision making to avoid harm.

London Forum has **serious reservations** about the "design-led approach" presented in Chapter 3 and has commented on them in the response submitted for Policy D6.

Page:	Introducing the Plan
Section:	N/A

Intro / 0.0.14
Since the London Plan version in 2011 the delivery of homes each year has not achieved the targets.
The housing delivery since 2015 and the rate of delivery under this Replacement London Plan
through to 2022 will be essential information for ensuring that its policies are effective for the supply
of homes. Therefore this paragraph should set a date of 2022 for a review of the housing targets, not
the more extended "before 2029".

Intro / 0.0.20
The statement is welcomed that "On some occasions, the Plan deviates from existing national policy
and guidance; this is mainly where the Plan is delivering on a specific Mayoral commitment and
reflects the particular circumstances of London."
The Examination of this Replacement London Plan should support that approach where it can be
demonstrated that Government policies are wrong for London. Examples have been the imposed
parking standards, housing standards and permitted development of offices which have been harmful.

Intro / 0.0.22
The production by boroughs of area and site specific allocations and plans is supported. It has proven in boroughs with that approach to be
the most effective way of securing community commitment and support for development because they understand and have participated in
policies and plans for what will be delivered and where. The use of Area Action Plans and Local Development Orders can speed planning
decisions and complement the process of Permission in Principle.

The Mayor writes in the Foreword "Many Londoners won't know about or have come across the London Plan, but it shapes their lives on a daily basis. It is one of the most crucial documents for our city, and what it contains shapes how London evolves and develops over coming years."

It is essential that people in London do know about the London Plan and contribute to its development. However, despite the details about the draft New London Plan on the GLA web site and in emails to those who had subscribed, there was very little notification to citizens that the opportunity existed to comment on the draft document and its associated papers.

A lot of the informing of communities about the New London Plan had to be done by the London Forum of Amenity and Civic Societies, the Just Space network and voluntary groups.

For all GLA and TfL consultatiions in future, the boroughs in London should use their Statement of Community Involvement process to notify all those organisations and people that they would normally inform about the opportunity to respond to the Mayor or TfL on draft proposals published.

Secondly, the Mayor's Foreword lacks the objectives he expressed in 'A City for All Londoners' that methods of transport will keep pace with the number of people needing to travel. Also the aim in that document for air quality to be back down to safe levels as soon as possible.

Paragraph 1.0.1 Car-free developments: London Forum **supports** car-free developments, both residential and commercial, in the right place – i.e. in areas which are (or are planned to be) well-connected by public transport.

However, there **should be more of a rationale for lower parking provision, here or better still in the justification for Policy GG2**, which explains that in the right locations lower off-street parking provision reduces the land-take, supports higher densities and results in lower prices for housing.

Paragraph 1.0.6 The statement that "A focus on large multi-national businesses in the centre of London has not been matched by economic development in other parts of the city." is not strictly correct. The development of the Great West Corridor and the Chiswick Business Park in LB Hounslow has demonstrated how international organisations like GlaxoSmithKline, which has its headquarters there, Sky and others can be attracted. **The background and success of that should be analysed by the Mayor with the borough for similar opportunities for economic development to be achieved in other Outer London locations and guidance should be prepared to support the Mayor's Economic Strategy.**

In **paragraph 1.1.1** extend line 1 to read:

'London is made up of diverse communities. Its neighbourhoods, local centres, shops, schools, GP surgeries, …'

Policy GG1 B is inadequate in content to achieve what is described in paragraph 1.1.4. At community/neighbourhood level the stress must be on **ease of access to or, for local services, within easy walking distance of a range of services, amenities and social infrastructure.** The current wording fails to capture the need to support walkable neighbourhoods.

Policy GG1 B should be modified to put 'easy' before the word "access". At the end of the section should be added 'Local services and amenities must be sufficient for the needs of local people for a primary school, local shops, healthcare, places for meeting and socialising and with close access to green and open spaces. They should be within easy walking distance of people's homes.' The aim must be to create sustainable communities.

Policy GG1 C: Strengthen to read 'Ensure that streets and public spaces are planned to a high standard and uncluttered so people can move around and spend time in comfort and safety, creating places where everyone is welcome.'

Page:	Policy GG2 Making the best use of land
Section:	N/A

1.2.3 The aims of this paragraph 1.2.3 are supported strongly but the words 'other social infrastructure' should be inserted after "health services". **There should be a cross reference in this paragraph to Policy D6 B.**

For **Paragraph 1.2.4** the "most accessible and well-connected places" are those with highest PTAL levels – word-searching the plan public transport accessibility expressed in terms of PTALs seems to have been air-brushed out of the Plan, appearing only in Policy D6 A (2) and C in terms of prioritising sites; Policy H1 B (in relation to assessing small sites) and H1 D in relation to incremental intensification; plus Policy T6 on car parking standards. Since areas with high PTAL levels are already mapped, searching for high PTAL sites rather than choosing sites and then looking at their PTAL level, seems a less efficient way of identifying sites. The Draft New London Plan seems to be in denial about its most effective search/scoping tool - PTAL.

Paragraph 1.2.7 line 4 should be modified by replacing "can" by 'should' or 'must'. It is essential that development is context-sensitive and acceptable to local people to secure their commitment to growth. It is essential that place making is a basis of decision making.

In **Policy GG2** the opening statement should be qualified by ensuring that high-density development is steered to the right places, not just intensified for its own sake and then try to retrofit it as a "place".

We propose a rewording of the opening as:

'To create <u>optimum</u> density, mixed-use places <u>in well-connected locations</u> that make the best use of land, those involved in in planning and development must:'

This policy is essentially promoting a choice sequence by:

1. prioritising types of places; and within those places
2. directing growth to the most accessible places – well-connected by public transport cycling and walking, as indicated by PTAL map (see Policy D6A(2)); and **then**
3. applying a design-led approach

Policy GG2 should not propose that in making the best use of land, new development will be of "high-density" when other policies (D6 A and E, H1 B, H12) propose **optimising** density and those other policies make clear that housing density will depend upon local factors of social infrastructure, public transport accessibility and capacity, local context and character and "the health and well-being of communities." (Policy GG3 D).

Policy GG2 B should be changed to:

'<u>Identify sites with the most</u> potential to intensify the use of land, including public land, to support additional homes and workspaces, particularly on sites <u>that are or will be</u> well-connected by public transport, walking or cycling (<u>i.e. sites with high PTAL levels)</u> which will help reduce the need to travel, especially by car.'

Followed by a new **Policy GG2 C**:

'Apply a design-led approach to exploring in detail the potential to intensify the development of these sites which must have sufficient and accessible social infrastructure, as in Policies D2 and D6.'

In **Policy GG2 E** add the words 'and capacity' after "public transport connections". There is a need here and elsewhere to recognise that both accessibility and capacity are key factors to be taken into account when optimising potential.

There needs to be an additional section in Policy GG2 which emphasises that 'Choosing to focus development in the right places helps to reduce the need to travel, especially by car.' The New London Plan needs explicitly to state, as its predecessors have done, the aim of reducing the need to travel.

Page:	Policy GG3 Creating a healthy city
Section:	N/A

Section E of Policy GG3 should be modified to 'Plan for improved access to green spaces, the provision of new green infrastructure and the ongoing maintenance of parks and open spaces.'

The restriction of unhealthy food options in **Policy GG3 G** is important but it is not clear how the Mayor will influence that by policy. There needs to be a cross-industry approach in the manufacture and preparation of food that reduces fat and sugar in the goods and meals available. The Mayor should indicate in text following this policy how that aim will be approached, otherwise it will remain just an intention.

A new Policy GG3 H is needed to deal with Air Quality with cross references to Policy D1 and Policy SI1.

The target for new homes each year is more than double that which home builders have been providing and **the New London Plan does not explain how a step change in delivery will be achieved**.

The intensification of land use in outer London to meet the housing targets, some of which have been doubled to those in the current London Plan (FALP), may not be possible and could meet strong local opposition. It is based on assumed densities above the middle of the appropriate density range for each identified site that was defined in the current London Plan as "sustainable"

The requirement for homes at social rent levels is 47% of the affordable homes (Table 4.3). Boroughs can set 20% of the affordable homes to suit their local needs but even if they allocated most of their discretionary amount to low cost rent, the need for homes at the lowest rent may not be met.

Paragraph 1.4.3 does not make sense. It states that of 66,000 new homes each year 43,000 should be "genuinely affordable", which seems reasonable due to the backlog of unmet need for such housing. So, 65% of new homes need to be affordable as in Table 4.3. However, the paragraph continues by stating that the Mayor's strategic target of 50% "genuinely affordable" homes supports the target. Clearly, it would not do so. **This needs clarification, otherwise boroughs will not seek and negotiate the mix of housing types required**. There has to be an indication of how the shortfall will be addressed and whether there is enough public-sector land for housing development that can deliver well above 50% affordable housing to compensate for developments that genuinely cannot deliver the Mayor's target of 50%.

1.4.6 Line 1: The word "are" should be replaced by 'is'

Policy GG4 B should be modified for a strategic target of **65%** of new homes to be affordable, to reflect paragraph 1.4.3 and the SHMA (Table 4.3). The policy should have in it the words 'Almost half of the affordable homes must be low-cost rental homes in order to meet the need identified in the London SHMA Table 4.3.' That is because three quarters of the backlog of housing need is for low cost rental homes, therefore that category should be given priority as the most urgent need.

The previous SHMA for the current London Plan aimed to meet the housing need backlog in 20 years, although Government guidance was to do so in five years. The latest SHMA has extended that by another five years to 25 years before the backlog will be met which means the housing crisis in London will continue for a longer period under the New London Plan than was the intention of the current London Plan. That is unacceptable and means that more policy support and funding must be given for extra homes to rent at low prices.

In **Policy GG4 C** after the word "needs," insert the words 'including the mix of sizes of units and types of housing, and the need for specialist housing.' Boroughs must be given the policy lead to negotiate with developers the type of housing that meets local requirements.

Page:	Policy GG5 Growing a good economy
Section:	N/A

Paras 1.4.8 ff should be renumbered 1.5.1 ff

In **paragraph 1.4.9 (to be 1.5.2)** the words 'good accessibility to and capacity of public transport,' should be inserted in the second sentence after the words "good health".

Surveys of businesses have indicated that London rates low on places to locate business due to air pollution and overcrowded public transport, as in the Mayor's Economy Strategy.

Policy GG5 needs an additional section H to deal with Air Quality with cross references to Policy D1 and Policy SI1.

Policy GG5 fails to mention the approach taken in the current London Plan policies 2.6, 2.7 and 2.16 for growing the economy of outer London. There should be a cross reference in Policy GG5 to Policy E8 G for the development of Outer London Development Centres.

GG5 G - should this say "optimise" rather than "maximise"?

Page:	Policy GG6 Increasing efficiency and resilience
Section:	N/A

Paras 1.5.1 ff should be renumbered 1.6.1ff

Paragraph 1.5.1 should have the words "that human behaviour is creating", replaced by 'that is taking place'.

Policy GG6 lacks a section for the retrofitting of existing housing and commercial buildings to achieve energy efficiency and resistance to extreme conditions. Boroughs should be helped by policy content on this in GG6 and by an explanatory paragraph.

Page:	Introduction to Chapter 2
Section:	N/A

Figure 2.1 - The London Plan's Key Diagram in each Plan version has been difficult to read and hence to understand and use. In addition to the full diagram, the Replacement London Plan should contain additional diagrams of each of the Key Diagram's four outer parts and of the central area, with overlaps, allowing larger text and, perhaps, indicating borough boundaries.

In addition, **each** of the maps in the New London Plan should be available in high quality on the GLA web site in a way that would allow zooming and viewing for local areas within the map.

Page:	Introduction to Chapter 2
Section:	N/A

In **paragraph 2.0.7** the words "properly integrated" are too vague. There should be cross references to policies for context, character and consideration of historic environment and available services, such as PTAL (see Glossary), Policy D1 B 1), D2, D6, D7, D8, G6, HC1, HC2 and HC4.

Paragraph 2.0.7 is supported strongly for its aim for regeneration and developing benefiting local communities. It would be useful to add in that paragraph that 'Communities should be fully engaged in development plans and their needs taken into account.' There should be no displacement of key workers and those in other local employment as a result of local development and regeneration.

Page:	Policy SD1 Opportunity Areas
Section:	N/A

There are several Opportunity Areas mentioned, following this policy for which there are no details. They should be described in the New London Plan or there should be a document published describing all of them.

There is a heavy dependency for the delivery of the homes and jobs in Opportunity Areas on the preparation, scope and quality of Opportunity Area Planning Frameworks and their interpretation and local planning for their achievement by boroughs in amended Local Plans. There is concern that the skills and resources needed for that level and volume of plan preparation may not be available and timescales could slip. There is also the danger that if there are not plans in place, developers will submit planning applications for land they can acquire for schemes that may not meet the best holistic and spatial opportunities, nor meet local need. That could adversely affect transport planning and the delivery of the types of homes that are required in each OA location which boroughs should define and insist upon. **The policy should address this issue**.

Policy SD1 is supported strongly. However, it has not been applied fully in the past and the status of some Opportunity Areas has not been as clear as the content of SD1 would have provided. The use of Opportunity Areas is so important that they should be reported upon in the Mayor's Annual Monitoring Report and actions to deal with deviation from plans or targets should be defined. That should be stated.

Policy SD1 section A 7) should be modified to 'monitor progress in delivering homes, jobs and infrastructure in OAs and the state of planning for them by boroughs, reporting on the progress of OAs in the Mayor's Annual Monitoring Report and taking action where necessary to overcome any barriers to delivery.'

Policy SD1 should have n additiional section 'Local Plans should be modified to define how public open space in Opportunity Areas will be achieved and maintained and existing open space protected.'

In the section which follows SD1, the figures show all Opportunity Areas but below them some of the ones indicated are not mentioned. **That should be addressed by footnotes to the location of full details.**

Figure 2.7 for the Thames Estuary is an example which shows eight OAs but only five of them are described in the text which follows. All OAs in each section should be described and their key dependencies and potential explained. If there are OAs shown in more than one figure, there should be cross references to the paragraph elsewhere which describes them.

In the current London Plan there are policies for Areas of Intensification and policies for them. In the draft New London Plan, some of them are now Opportunity Areas but some are not mentioned. There should be a paragraph below SD1 to explain the status of any of the previous Areas of Intensification which are not now OAs.

Many of the OAs were identified up to ten years ago. It is surprising that so many of them are in the nascent state or only now in the ready to grow state. Figure 2.2 states that the timing to maturity of the latter will be ten to fifteen years and **that is of concern for the phasing of all housing delivery in the period of the Replacement London Plan**.

There should be a paragraph following Policy SD1 to explain why the state of planning for many OAs is at an early stage and what the Mayor will do to intervene to achieve progress on the ones that could deliver the most housing early and benefit the areas in which they are located.

There seems to be significant dependence for development on the Bakerloo Line extension so the timescale of its delivery will be important for provision of the homes required and the attractiveness of the area through which it passes to businesses.

Figure 2.4 does not indicate with which other lines the stations that are marked as interchanges will connect. **That should be indicated.** This applies also to other figures that indicate interchanges.

The requirement is supported in **paragraph 2.1.15** for "The need for the additional public open spaces the area will require as it evolves, and its broad location and scale, should be set out as part of the AAP." That should apply to all Opportunity Areas and Local Plans should be modified to define how public open space will be achieved and existing space protected. That should be covered by content in Policy SD1, as proposed. The aims expressed in paragraph 2.1.14 are supported for the opportunity to consolidate industrial uses in the Old Kent Road and Park Royal OA that are displaced from other areas. The intensification of industrial land may not be sufficient, however, and there should be provision for increasing it where possible. Close location of industrial uses and housing should be avoided if there would be conflict caused by industrial activities' noise, odours or considerable vehicle movements.

The London Forum of Amenity and Civic Societies submitted a response to the consultation on the Bakerloo Line. It should be considered by TfL or at the examination of the Replacement London Plan section on this subject in pages 33 and 34 to assess if it describes the best Underground extension scheme or not.

With the possible exception of Essex Road, Walworth Road carries more bus passengers than any radial route in London, and should be the prime candidate for a new Metro service. We do not believe that re-opening the station on Thameslink that gave its name to the public highway, welcome though it would be, adequately meets the needs of Walworth Road and Camberwell.

The London Forum does not perceive there to be any London wide issues arising from the siting of two stations along Old Kent Road. We believe that local opinion should determine how these are resolved. We note the campaign for a third station in Old Kent Road, which would be stronger if a cut and cover extension could be developed, and which forms part of the cut-and-cover proposal.

The requirement is supported in **paragraph 2.1.15** for "The need for the additional public open spaces the area will require as it evolves, and its broad location and scale, should be set out as part of the AAP." That should apply to all Opportunity Areas and Local Plans should be modified to define how public open space will be achieved and existing space protected. **That should be covered by content in Policy SD1**, as proposed.

Page:	Crossrail 2
Section:	N/A

The Crossrail 2 policy should include the words 'Local Plans should be modified to have Area Action Plans or other Supplementary Planning Documents to define how CR2 opportunities will be met.'

Paragraph 2.1.20 is supported strongly for local authorities to identify the opportunities for development that Crossrail 2 will bring in Opportunity Area Planning Frameworks. **The text should require Local Plans to be modified to have Area Action Plans or other Supplementary Planning Documents to define how those CR2 opportunities will be met. The Policy content for Crossrail 2 should cover that.**

Figures 2.5 and 2.6 indicate a route for Crossrail 2 which has varied from its original proposals. The proposed route should be discussed at the examination of the Replacement London Plan to consider if it provides the best transport congestion relief that it could, if its interchanges are the best for development and if the policy needs to be changed.

The London Forum of Amenity and Civic Societies commented on the Crossrail 2 plans on behalf of communities and made the following points which do not affect the content of the New London Plan but should be taken into account by TfL:-

The recent preference for a Regional rather than a Metro scheme flies in the face of the London Plan, whose first transport objective is to reduce the need to travel.

A feature of the original scheme was the provision of interchange with all local lines crossed, so that the journeys of passengers could be shortened and the most congested lines relieved.

The construction of a new line inevitably involves disruption. We would expect removal of spoil by road to be minimised and confined to suitable main roads. Wherever possible, water and rail should be used instead.

The route through Hackney Central should have greater priority.

If a route towards Stansted is to be developed a station at Tottenham Hale is a must.

A station at Essex Road, with an additional point of egress to the south of the current station, would better meet the need to improve links to this area and would provide the interchange that would decongest the GN line.

Like Tottenham Court Road, the case for a station at Victoria is overwhelming.

At Clapham Junction we are concerned that the inadequacy of platforms for the London Overground will need to be addressed. The original platform 1 or an equivalent provision will be essential to meet rising demand, which will grow further with the introduction of CrossRail2. Indeed, the layout of the whole station needs to be reviewed to ensure that it is capable of dealing safely with the increased numbers of passengers changing trains or entering/leaving the station.

Angel Road must be the least accessible station in London, if not on the entire Network Rail network. Improvements must be done far more speedily than will be possible as part of such a large scale scheme as CrossRail2.

Page:	Elizabeth Line East
Section:	N/A

Opportunities for stopping HS1 (Elizabeth Line) trains at Stratford is not considered in this section of the Replacement London Plan. It would improve transport links and avoid HS2 passengers having to negotiate Euston and St Pancras stations to access HS1 when they could transfer at Old Oak to the Elizabeth Line. It would also avoid overloading of those Central London stations and **should be covered by relevant content in Policy for HS2**.

Page:	Heathrow/Elizabeth Line West
Section:	N/A

The opportunity for a rail link from the Great West Corridor at west Brentford in LB Hounslow to the Elizabeth Line at Southall should be investigated, costed and its timescale estimated. **It should be covered in the policy proposals for the best exploitation of the Elizabeth Line**.

Unless it is achieved, the Great West Corridor would not succeed as an Opportunity Area.

Page:	High Speed 2 / Thameslink
Section:	N/A

The West London Orbital Line from Brent Cross to Hounslow mentioned in paragraph 2.1.55 is supported strongly and its feasibility, cost and timescale should be clarified. Policy content for its delivery should be covered in Chapter 10 T3.

Opportunities for stopping HS1 trains at Stratford is not considered in this section of the Replacement London Plan. It would improve transport links and avoid HS2 passengers having to negotiate Euston and St Pancras stations to access HS1 when they could transfer at Old Oak to the Elizabeth Line. It would also avoid overloading of those Central London stations and should be covered by relevant content in Policy for HS2.

Page:	Central London
Section:	N/A

It will be important that the HS2 construction plans and the planning brief for the area around Euston Station "currently being produced" (paragraph 2.1.67) **minimise the loss of existing social housing. That should be covered by policy in this section.**

Page:	Policy SD2 Collaboration in the Wider South East
Section:	N/A

Paragraphs 2.2.5 and 2.2.8 following Policy SD2 are supported but in 2.2.8 the word 'may' should be replaced by 'should', as in paragraph 2.2.5.

The Mayor's priority should be to deal with overcrowding and developing good growth in zones 3 and 4, ahead of measures to develop the WSE.

Figure 2.13 needs to have the local authorities around London identified by being numbered and listed. The words "from the top left" are not meaningful for the map and the explanation should be improved.

Page:	Policy SD3 Growth locations in the Wider South East and beyond
Section:	N/A

It is stated in paragraph 2.3.3 that there is a capacity shortfall of developable land in London for at least 1,000 homes annually. The intentions covered by the paragraphs through to 2.3.8 are supported for liaison with local authorities around London to address that problem. However, although the Mayor is conducting talks with the WSE, **boroughs may not be clear on their role in conducting their relationship with local authorities surrounding the GLA boundary**. The Mayor needs to ensure their activities, negotiations and plans are compatible and supportive or his own objectives. **The Mayor should indicate to outer London boroughs in Policy SD3 how they should best carry out their Duty to Cooperate across the GLA boundary in order to facilitate his objectives for working with the WSE**.

Page:	Policy SD4 The Central Activities Zone (CAZ)
Section:	N/A

SD4 There should be a cross reference to Policy D10 for flood risk. Paragraph 2.4.7 should be modified to change "This should recognise both . . " to 'This should avoid harm to . . '

Paragraph 2.4.9 should have added after " . . the evening and night-time economy" the words 'but not to the detriment of the traditional residential, light industrial and specialist retail uses.'

In paragraph 2.4.13 for Special Policy Areas the Marylebone / Regent's Park and Portland Place's association, long standing, with educational institutions should be recognized.

In paragraph 2.4.15 the words 'for development' should be added after the word "applicants".

Paragraph 2.4.16 should have cross references to Policy SI4 and to Policy SI12. In paragraph 2.4.16 the words "taking into account" should be replaced by 'and avoid problems caused by'.

Paragraph 2.4.18 is supported for its requirement for boroughs to meet the "demand for industrial and related uses providing essential functions and services to the CAZ".

Page:	Policy SD5 Offices, other strategic functions and residential development in the CAZ
Section:	N/A

It is not understood how or why offices and other CAZ strategic functions are given equal weight relative to new residential in predominantly residential neighbourhoods or wholly residential streets, as in SD5 D 3). **It would imply possible replacement of housing with commercial uses** which would cause problems in the support of local facilities. There may be opportunity for CAZ-type uses in areas where housing could be densified but that should be discussed at the examination of the New London Plan.

Page:	Policy SD6 Town centres
Section:	N/A

Section C of Policy SD6 relates new higher-density development to the current and future accessibility of public transport but the policy does not make clear how the local social infrastructure in the town centres will determine what density should be permitted in new schemes to avoid overloading those facilities. That should be clarified.

Policy SD6 D proposes the particular suitability of town centres for smaller households (build to rent, old people's housing and student accommodation).   One and two bedroom flats are suggested as a priority. There is a danger that this policy will create a less mixed community with a form of ghetto/enclave for young and old, leaving out families. In a town centre area, in particular, there should be an inclusive and diverse range of young, old and families planned for in order to sustain and encourage a centre which is lively throughout week days, evenings and weekends. Without this there is a risk of catering for short term need and so detracting from rather than revitalising town centres.

Policy SD6 F needs a cross reference to Policy D12 Agent of Change

The content of **paragraph 2.6.1** are important and should be covered by an **additional section** in Policy SD6 on the planning and management of public squares, markets, parks, gardens and other open spaces.

The use of the word "higher-density" in **Policy SD6 line two** is meaningless because there is no explanation of what it is of which new density should be "higher".

Policy SD6 must accord with other policies in the Replacement London Plan for the density of housing to be "optimised", as in the comments made in this submission for Policy GG2 (which should be considered also here for this comment on Policy SD6 and which quotes about optimisation from Policy D2 B, Policy D4 A, Policy D6 A 3), Policy H1 B 2), Policy H12 and paragraphs 3.6.1 and 4.12.2).

To be compatible with those other policies, the words "higher-density" should be changed to 'optimum density' in section C of Policy SD6. It is only when density is optimised to relate to local social infrastructure, the accessibility and capacity of public transport and the local context and character that new housing schemes will be sustainable, not cause harm and obtain the support of local people.

The current London Plan's density matrix which covered those matters stated that when they are properly applied, those considerations would result in "sustainable residential quality". That quality must not be compromised by a change in this version of the Plan to the seeking of high densities where they are not appropriate.

Policy SD6 could have an additional section for 'The impact of major shopping malls like Westfield on nearby town centre businesses should be examined, monitored and mitigating actions taken.'

Section I of Policy SD6 should have the words added at the beginning 'Social infrastructure capacity and services will restrict the new housing and even the commercial developments that can be approved and therefore the provision of. . .'

Also, it is essential that the Replacement London Plan requires boroughs to consider information on the public transport accessibility level (PTAL) figures for all locations. This information is necessary to plan for where transport should be improved by using whatever funding sources exist to allow more intensification of land use for development. It is also used by boroughs to make decisions on planning applications received to ensure that permission is given only for housing schemes of a density that will not cause the problems above. Other advantages of the current London Plan density matrix and its associated advisory paragraphs is that they guide boroughs in assessing new development applications based on the distance from town centre facilities and consideration of the local context and character. Despite the details in the policy of what should be taken into account, the omission of the density matrix does not seem to be necessary. There should be additional sections in Policy SD6 to deal with the traffic associated with waste management collections for businesses in town centres, to avoid road congestion, bus delays and pollution.

The policies for building housing within and on the edges of town centres are very prescriptive. It seems that Boroughs have not been allowed to define these areas. The area of 800 metres from the edge of a town centre or train or tube station covers a very large area in any London Borough. It is in these areas that the Plan states that new housing should be realised through higher density mixed use or residential development. This could adversely affect the special characteristics of many areas. **More flexibility should be incorporated in the London Plan to allow Boroughs to identify the best approach to growth in their area which they will know in detail best. Protection of valued local character should be a prime consideration so that development is undertaken in a way that preserves what is most valued by those who live and work in the area, both now and for future generations.** In that way, local residents' resistance to development should reduce.

Page:	Policy SD7 Town centre network
Section:	N/A

Policy SD7 B suggests "reassessing town centre boundaries" and refers to Policy SD8 Town centres. It must be made clear that when assessing the 800m walking distance from a town centre for assessing density of new development, the distance should be from the development site to the primary frontages with the town centre, not its edge.

It is noted that Policy SD7 C uses the correct term for a borough plan: "Local Plan". In other parts of this New London Plan the term "development plan" is used and all of those should be changed to "Local Plan" which is the definition of the Government and is understood by communities, businesses and developers.

Add to SD7 D 'The impact of these types of centre and of major shopping centres should be assessed and monitored for their effect on other town centres and their viability and offer.'

Figure 2.17 for town centre locations should be accessible by a link to the GLA web site to a high resolution image of it that can be zoomed to see detail at a local level.

In **paragraph 2.7.3** after the words "town centre boundaries" should be added the words 'and in liaison with adjoining local authorities on the basis of Duty to Cooperate.'

In **paragraph 2.7.4** the words "These centres" should be clarified for the ones to which the text then refers.

Paragraph 2.7.4 states that "a clear strategy should be developed" for "retail parks, dominated by large format stores and heavily reliant on travel by car" which often have large surface car parks. That is important and **should be part of Policy SD7**.

Policies SD7 and SD8 should make clear that in town centre development the small local service and business uses in the 'back streets' should be protected and enhanced and their rental costs and business rates should be kept at levels they can afford.

The words "Development Plans" in this section should be replaced by "Local Plans", the definition of a LPA's plan which is used by the Government and well understood. That should be done throughout the New London Plan.

Policy SD8 A 3) should have added to the end of the sentence: 'or would have an impact of an adjoining local authority.'

In **Policy SD8 A 4)** after the words "and walking" should be added 'and the availability nearby of the social infrastructure facilities needed.'

Policy SD8 B 2) should make clear (perhaps in a paragraph) that intensification of District Centres may not be possible and should be planned carefully with local communities and businesses.

Section B 4 of Policy SD8 provides guidance on the considerations for the scope to accommodate new commercial development and higher density housing in town centres. The criteria include public transport accessibility and capacity in B 4) c). However, **another criterion should be added** 'the capacity and proximity of social infrastructure, shopping and other facilities and services.'

Policy SD8 B 5) b) should have added on the end of the sentence the words 'or have only one or two floors of residential above them.'

Policy SD8 C should have an additional point 5) added: 'demonstrate suitable arrangments for the disposal of waste.'

Page:	Policy SD9 Town centres: Local partnerships and implementation
Section:	N/A

Policy SD9 lacks an essential requirement that local trader/business/professional services associations should be formed in town centres. They can deliver mutual support, a united voice on rents, business rates, street licensing, crime reduction and liaison with community groups and the local authority. Evidence has indicated that town centre management is better when such associations are in place. **Policy SD9 A** should have added to the end of the first sentence the words 'including Traders' Associations'.

London Forum supports the requirement in SD9 C 1) to introduce Article 4 Directions where appropriate and justified to remove permitted development rights.

Paragraph 2.9.2 should have the word ', pedestrianisation' after "Healthy Streets" and the words 'community groups' after "landlords".

Page:	Policy SD10 Strategic and local regeneration
Section:	N/A

Policy SD10 and its associated paragraphs are supported by London Forum for their aims but the scope of the policies is not sufficient.

There should be reference in Policy SD10 to considering the homes that people have now in Local Areas for Regeneration. Exploitation of people experiencing inequality and deprivation has been reported in those areas, caused by landlords of Houses in Multiple Occupation which are overcrowded, poorly maintained and, in some cases, unfit for habitation. The rents that some people have to pay and the lack of space for a normal family life worsens their deprivation and those who have to seek benefits to survive add to the cost to the 'public purse' and result in landlords being subsidised by the State.

The New London Plan should require boroughs to take action to reduce that problem.

Newham Council in east London, the first to introduce a compulsory borough-wide licensing scheme for landlords in 2013, shared their names and property addresses with HM Revenue & Customs. The borogh has 27,000 registered landlords and said in August 2017 it understood that 13,000 had not registered for self-assessment, which is generally required if a property owner receives £2,500 a year or more in rent. The council estimated that unpaid tax by landlords is costing the public purse nearly £200m in London – and far more nationally. Newham said it has instigated 1,135 prosecutions for housing crimes. It has banned 28 landlords, served 2,170 notices to improve properties, and recovered £2.6m in additional council tax. Newham has among the highest levels of private renting in the UK. Between 2006 and 2016, the share of the total housing stock in the borough owned by private landlords leapt from 21% to 46%.

Policy SD10 must mention in section B the private-rented sector (PRS) housing of people suffering deprivation and overcrowded housing. Boroughs must take account of (PRS) problems which make people's lives worse.

Policy SD10 section A 2) should have added to its end ', including the types of homes, their tenure and suitability that people in those areas occupy.'   Every borough in London could do what LB Newham has done but too few do so.

There should be an extra section D in Policy SD10 that 'Boroughs should include proposals for PRS regulation and monitoring in their local policies to achieve homes fit for purpose. The results should be included in their Annual Monitoring Report.'

Another section E in Policy SD10 should be added to state 'Boroughs should to prioritise some areas for local regeneration for the supply of social housing to alleviate problems that those on low incomes can experience in the PRS.'

A section F is required in Policy SD10 that 'No enforced displacement of people living locally in Strategic Areas for Regeneration should be caused by changes and developments made.'

Many people suffering inequality and deprivation are in low paid work and are making a contribution to the local economy. The RTPI published a paper in January 2018 at http://rtpi.org.uk/briefing-room/rtpi-blog/tackling-poverty-and-inequality-needs-to-take-account-of-place,-not-just-people/

It is important for the proposals it makes for improving the places in which disadvantaged people live. The report draws on evidence of how problems such as worklessness, low incomes, lack of aspirations, and ill-health are not simply a reflection of individual circumstances but are also a reflection of the social conditions and the opportunities that are available to people living in a particular place. That is mentioned in **paragraph 2.10.4** but not developed.

In arguing for a 'return of place' in wider policy thinking, the RTPI report contends that a stronger focus on place-based programmes of intervention could do much to reduce poverty, inequality and the social problems that stem from them. Yet the benefits of any place-based approach will only be fully realised if these are aligned with socially progressive and redistributive people-centred policies.

Therefore, **Policy SD10 should have another section G as follows** - 'Boroughs should plan to improve the quality of the neighbourhoods, streets, and local economies in areas where there are concentrations of deprivation and disadvantage.'

There needs to be a strong policy focus on equipping people with increased skills to improve their opportunities, as in paragraph 2.10.2.

Paragraph 2.10.5 is supported and is important for developing Opportunity Areas in a way that will benefit the communities living around them, as well as those within the designated areas.

| Page: | Policy D1 London's form and characteristics |
| Section: | N/A |

Policy D1 London's form and characteristics

Policy D1 The content of Policy D1 is **supported strongly**. It should be made clear that the content should be the basis on which local planning decisions will be made.

However, there are several immprovements needed in this policy and associated text.

In **D1 A (1),** 'optimising density' should be cross-referenced to policies for housing density (D6) and should be related to the public transport accessibility level (PTAL) for each site, which is available to boroughs. See proposed changes to paragraph 3.1.1 below.

D1 A (7): After "conveniently-located" add "and accessible" – ease of access is important, particularly the location of entrances.

Section D1 B (2) after the word "safety" add 'including flood and fire resilience.'

Section D1 B (5) add at the end ', through the use of sustainable urban drainage and soak-aways for areas of hard surface, such as public open space and car parking areas and for major developments where the re-use of 'grey' water and other sustainable drainage facilities can be provided.' NB: This issue is not covered in the reasoned justification section for this policy. It needs explanation plus a **cross reference** to Policy SI13: Sustainable drainage.

Paragraph 3.1.1 – in line 6: After "optimisation of density" add 'in relation to its overall connectivity and character and context.' This paragraph seems to parachute directly to the site without any of the context in terms of location, accessibility and local character that it subsequently cross-references. It needs to be set within, and to set, the broader context.

Paragraph 3.1.6 Since when was public transport part of "active transport"? Compare with Policy T3A which refers to "public and active transport" – they are separate and different. Delete "public transport" in Line 2.

After paragraph 3.1.6: There should be another paragraph to require that 'Boroughs should ensure that the density of new development is appropriate not only in relation to the accessibility but also to the capacity of local infrastructure, particularly public transport and local social infrastructure. (See also Policy D6 Optimising Housing Density, Policy H1 Increasing housing supply and Policy T3 Transport capacity, connectivity and safeguarding)'.

3.1.9: Add a Cross Reference to Policy D11 Fire safety.

Policy D2 is more like a step-by-step how to do it good practice guidance rather than policy.

Policy D2 A (3) should be expanded to cover 'existing building materials and public realm attributes'.

Policy D2 A (4) In Line 2: After "connectivity" add 'and capacity'. The ability of existing or planned transport capacity to absorb more people travelling and the ease of reaching desired destinations using them should be considered to determine sustainable density of new development, as in Policy D2 B (1) and D2 F (1) **which should be cross referenced**.

Policy D2 A (7) should have added at the end 'and potential harm that may be caused to them.'

Policy D2 A should have an additional element 12) to cover 'Daylight and Privacy standards'.

Policy D2 B should include a caveat about ensuring adequate transport capacity.

Para 3.2.1: Last sentence is verbatim repetition of last sentence of Policy D2B!!

Para 3.2.2: Cross reference to public transport capacity is required with **cross references** to Policies D6 and T9 at the end.

Para 3.2.5: At end of first sentence add cross reference to Policy D6.

Paragraph 3.2.8 should have added the word 'orientation' and that should be explained as important for light to habitable rooms, overlooking, local views and resistance to overheating.

Paragraph 3.2.10 is supported and its importance should be emphasised so that what is approved is actually delivered.

Page:	Policy D3 Inclusive design
Section:	N/A

Paragraph 3.3.2 Line 2: after "lives," add 'by maintaining walkable neighbourhoods, so creating more inclusive communities.'

The London Plan should be promoting walkable neighbourhoods – yet Policy SD6 A (6) is the only reference in the whole plan!

Paragraph 3.3.2 has its last two sentences as a doublet - which is the version intended? The first is about trips out of the neighbourhood, whilst the second trips into the area. A rewrite could be:

"Links both to the wider neighbourhood and those into the neighbourhood for all pedestrians should be carefully considered,…."

Paragraph 3.3.4 should have additional words to require that there are no 'poor doors' in new developments containing affordable housing units and that, wherever possible, the design of entrances to each group of dwellings is similar and there is no visual difference for housing types. This requirement is in the current London Plan and has been applied. It should not be lost as a development requirement and may be needed in Policy D3.

Paragraph 3.3.7 requires "historical contextual considerations" to be explained or detailed in the Glossary.

Page:	Policy D4 Housing quality and standards
Section:	N/A

Policy D4 D for private internal space should have some words about reception and study space.

Policy D4 D for private outdoor space could have added a **cross reference** to children's play space requirements as in paragraph 3.4.7 and Policy S4.

Paragraph 3.4.2 the first two sentences are contradictory.

Paragraph 3.4.6 should have added 'However, the privacy of other occupants should be preserved.'

In **paragraph 3.4.11** the bullet point starting "the design of developments" should have added on the end 'and periods of extreme cold'.

In paragraph 3.4.11 the last bullet point should have added 'Storage facilities for waste and recycling bins should be designed to reduce their visual impact'.

Page:	Policy D5 Accessible housing
Section:	N/A

Policy D5 is generally supported but it is deficient on one aspect of access. It could benefit from an additional section which requires that 'Boroughs should consider the access into and out of housing developments and the quality of the route from them to bus stops and to local infrastructure facilities to ensure that people who are disabled have equal chances as others to lead a satisfactory life in the community without unnecessary help.'

Page:	Policy D6 Optimising housing density
Section:	N/A

The London Forum has **very serious reservations** about the "design-led approach" presented in this policy – indeed the concept has only two specific references in the Plan: Policy GG2 and Policy D6.

Our reservations are:

- **this is not a tool for planning the location of development** – as presented it is purely a development management tool for assessing developer-led proposals, in an attempt to sideline the Density Matrix as tool for scoping both the most appropriate sites for high-density development – getting the right development in the right place and assessing developer proposals by indicating the appropriate density range for any site.
- **from a community perspective, the process would further remove the development of high-density schemes from public scrutiny**. At the moment with projects being developed and agreed between developers and their advisors with planners in confidential sessions, the density matrix may provide a benchmark for negotiation. This secrecy and the potential for planners to be "captured" in these negotiations and the result is "done deals", is a major fear for local communities. This process raises strong concerns about openness, accountability and community confidence in the planning process. We fear that this gives the developers a stronger bargaining position and the community has to live with the results. To maintain public confidence the development process will need to become much more open and provide more opportunities for co-design with the community. From a community perspective, the "design-led approach" looks it could mean less rather than more opportunities for shaping their own community.
- **there are concerns that, with a "design-led approach" there are fewer benchmarks and the discussion revolving around design appears to be much more about judgement or even taste** – all very "touchy-feely". The emphasis seems to be more about getting the "most" out of the site, relying on the design of the building to ensure acceptability of the scheme, rather than being sensitive to its context and its acceptability to the local community.
- **there are serious concerns about the current skills and capacity of London Borough planning departments** to undertake the more demanding dceesign assessments proposed in policies D2, D6 and D8. Although one could argue that the policies merely formalise what they should be doing anyway, and few will say they cannot do it, we doubt whether they are "shovel ready"! This issue was a major concern of the panel who appeared before the GLA's Assembly Planning Committee
- **the alleged dumping of the Density Matrix is an illusion –** as it is still needed to scope the best locations for higher-density developments, scoping the capacity of sites based and for assessing the most appropriate density range for particular sites, all based on the same main factors as the so-called "design-led approach" – context/setting, public transport accessibility levels. Dumping the Density Matrix complicates the process of development control.

London Forum proposes:

- **retention of the Density Matrix**, even as an interim measure until the "design-led approach" has been developed and its appropriateness evaluated;

- **put more emphasis on the plan-led process** where there are Site Allocations in Local Plans for which the capacity and the form of development is agreed with the local community;
- **further work be undertaken of mapping local services, amenities and social infrastructure,** their relative accessibility, their capacity to serve a larger customer base and the scope for increasing capacity, and, in particular, the challenges of planning for growth/change, such as future provision of primary schools, GP surgeries and the viability of local services. Few boroughs have mapped their facilities, the gaps, their needs, let alone planned for growth at the neighbourhood/community level. Few have seen local communities as the fundamental building block, let alone devised strategies for making them more sustainable, resilient and less car-dependent.

Policy D6, therefore, describes a "developer-led" rather than a "plan-led" approach. Policy GG2 essentially, but not very well, describes a sequential approach to prioritising and identifying sites for development – a plan-led approach. Policy D6 describes a framework for assessing proposals brought forward by developers – a <u>developer-led approach</u> masquerading as a "design-led approach". It will be perceived by communities as further transfer of power toward developers, just at a time when communities are seeking not only greater engagement in planning and development but also wanting to have more of role in shaping the future of their community/neighbourhood, as the Localism Act told them they would have.

Policy D6 A fundamentally depends on:

- **the context and character of the area;**
- **the accessibility of site to the public transport network – its connectivity; and**
- **the accessibility of the site to a wide range of local services, amenities and local social infrastructure**

In <u>planning for</u> higher-density development, local planning authorities should prioritise sites, through the sequential approach prescribed in Policy GG2, with the potential for higher densities based on its location. This approach would lead directly to sites where higher densities would be most appropriate. It is only then that a "design-led approach" to optimising density kicks in.

Such a sequential approach would prioritise sites with higher public transport accessibility levels (PTALs) as in Policy GG2. The approach taken in Policy D6A is essentially a development management tool to be applied to any site – a development management tool.

The missing link in all this is the absence of the plan-making function, which prioritises sites in the most appropriate locations. It would appear that the authors, in their eagerness to get to the "design-led approach" stage, have bypassed the plan-making, prioritising and identification of sites, and only describe a development management tool. It would appear that the pro-active plan-making, scoping function of guiding development to the most appropriate location has been written out of the script! This policy needs expanding to cover both the plan-led approach and the developer-led approach, <u>after</u> which the "design-led approach" should be applied.

Policy D6 A: Second sentence should be rewritten to read:

"Local plans should prioritise sites with high public transport accessibility, as proposed in Policy GG2.

Policy D6 should be redrafted to ensure that new development respects the scale, density and height of surrounding areas, particularly where they include World Heritage sites, the settings of Listed and Locally Listed buildings and designated Conservation and Character Areas. An extra paragraph with the policy should give a clear sense to the concept of "optimisation" by explaining the factors to be considered along with appropriate guidance and cross references on how the balance between them is to be struck.

Policy D6 A 2) Line 1, after "cycling, and" add "<u>accessibility to and the capacity of</u>" before "existing and planned public transport (including <u>public transport accessibility levels</u> (PTALs)

At the end of **Policy D6 A 2**) should be added "See Figure 4.2: Public transport access levels." **Although perhaps Figure 4.2 should be brought forward to this section**

Policy D6 A 2) contains two 'considerations' and they should be separated. The absence of a density matrix makes it more difficult to see visually and to apply to applications the full criteria that are explained in the current London Plan. The reason for the omission of that matrix should be explored at the examination of the Replacement London Plan. Policy D6 C should have added at its end 'The management plan should cover the requirements of Policies H5, H7 and H12.'

Policy D6 A 3) should be expanded to read: 'the capacity of surrounding infrastructure, particularly public transport and local social infrastructure'. The distance from new developments of the services that new occupants will require is important and should <u>restrict</u> the density of additional housing until more facilities nearby can be provided. If that is not done, there could be a need for people to use their cars, contrary to policies in the Replacement London Plan to achieve modal switch and avoid increased road congestion and air pollution. There could also be problems for people on low incomes to access those facilities.

Policy D6 C should have a policy on the **minimum density** that should be allowed. In 2016 the GLA commissioned a study of the density matrix in the current London Plan by an LSE team (Ian Gordon, Alan Mace and Christine Whitehead) which concluded that the London Plan should specify minimum permitted densities. London Forum agrees that should be used to assess low density developments.

Policy D6 C does not make clear that the three criteria in it are those that require a referral of a planning application to the Mayor. The words 'submit a management plan if the proposed density is above:" should be replaced by "submit the application to the Mayor, together with a report on the implications and a management plan, if the proposed density is above: '.

Neither the content of such a management plan or the criteria for assessment are specified in a subsequent paragraph **which must be done**.. It is significant that the thresholds refer to units per hectare and not habitable rooms per hectare. This completely disregards the fact that the impact of development in terms of public transport and demand for services relates to the number of people occupying, or likely to occupy, new homes and <u>not the number of dwellings</u>.

Policy D6 D should be modified to require also provision of the amount of private amenity space and children's play space expressed in terms of the number of expected occupants, as in **Policy D4 which should be cross referenced**. The Mayor should publish a minimum standard for those aspects of a housing development.

In **paragraph 3.6.1** should be added references to Policies SI15 and SI12.

There should be an extra paragraph about the relationship of permitted density and land prices. It should state 'Boroughs should not allow densities above the guideline levels because it will encourage developers to pay too much for land and increase land values. That will cause problems for councils and non-profit housing associations seeking to buy land cheaply to provide social housing and it will reduce the quantity of affordable housing that developers can afford to deliver.'

That is really important and should be considered as part of Policy D6.

Page:	Policy D7 Public realm
Section:	N/A

There should be reference in Policy D7 to Policy E9 B (7) on London's various types of markets and their importance for communities.

Policy D7 M should have the following words added. 'Such facilities must be protected from contamination and health hazards (e.g. foot pedals for initiating water flow, not taps, and shielded water delivery pipes). Remove the words "in new or redeveloped public realm" because water fountains should be supplied in all existing public areas as well as developed ones.

The GLA should seek legal powers to allow Councils to install street lighting etc. on to buildings, as is now the case in the City of London; this would minimise street clutter. If agreed, this should be explained in an additional paragraph.

Page:	Policy D8 Tall buildings
Section:	N/A

In the opening paragraph of Policy D8 in line 4 delete "and". Then after "design quality" add: 'and make a positive contribution to the skyline, townscape and the scale shaping the character of the area.'

Policy D8 B should be modified to include "Boroughs should identify on maps in their Local Plans the locations where tall buildings would be appropriate, sensitive or inappropriate, and should indicate the general building heights that would be acceptable, taking account of:" That continues the Local Plan requirement in the current London Plan Policy 7.7 E.

Policy D8 B 3) Add 'and capacity' after "connectivity". That is because tall buildings, such as those in the City or The Shard, may be close to stations, but may result in pressure on capacity.

Policy D8 C 1) a) iii at the end of line 2, after "direct" add 'positive'

Policy D8 C 1) a) should have added to the end the words 'There should be a podium or some other design form of set back from the street where the buildings opposite on the street are of a lower scale.' (At present it only refers to the scale of adjacent buildings and to open spaces, but not to buildings on the other side of the street.)

Policy D8 C 1) a) Add new 'iv. Impact of the building on the local community and the character of the area.'

Policy D8 C 1) d) the last sentence should apply to all locations, not just ones with heritage assets. The sentence should be an additional item for that in this 'Impacts' section and should have added on the end 'and not cause harm'.

Policy D8 C 1) e) should have added 'and should conform to the requirements of each WHS Management Plan.'

Policy D8 C 1) f) Line 4: After "along" add "and across"

Policy D8 C 1) should have a reference to paragraph 3.8.2 for which applications for tall buildings should be referred to the Mayor.

Policy D8 C 1) should have an additional section to state 'Tall buildings should not carry advertising panels.'

In **Policy D8 C 2) a)** the words 'particularly in the case of fire.' should be added at the end.

In **Policy D8 C 2) d)** the following words should be added at the end - 'If the capacity of social infrastructure and public transport is not sufficient, the development may need to be phased.'. That would be consistent with other parts of the Replacement London Plan where consideration is given to the access and capacity of services, facilities and public transport, [as in Policy D6 B 3)]

In **Policy D8 C 2) e)** the words 'planned for funding,' should be added before the word 'delivered'.

In **Policy D8 C 4) a)** the following words should be added 'A cluster of tall buildings should allow each one to have its own identity visually and not to merge into one building mass.'

Para 3.8.1 Line 4: After "public transport" add ', have sufficient public transport capacity....'

Page:	Policy D9 Basement development
Section:	N/A

London Forum supports this policy.

It needs to have an explanatory paragraph about the Court decision that most basement constructions are "engineering operations" and therefore need planning permission.

Page:	Policy D10 Safety, security and resilience to emergency
Section:	N/A

Paragraph 3.10.2 should have the words "in both design and management." replaced by 'in design, materials used and management.'

Vulnerable uses, e.g. housing, should not be built in flood zones 3A and 3B.

Page:	Policy D11 Fire safety
Section:	N/A

Policy D11 A 4) should be modified to read 'develop, update periodically and publish regularly in all blocks of flats a robust strategy for evacuation in which all building users can have confidence.'

Policy D11 B should have an additional requirements for 'how maintenance and modifications should be conducted in order not to compromise the fire protection between sections of the building' and 'what sprinkler or other fire suppression systems are incorporated' and 'what alarm systems are fitted for awareness of residents of danger'

Paragraph 3.11.5 should have added after the first sentence the words 'and refurbishments of existing buildings.'

Page:	Policy D12 Agent of Change
Section:	N/A

Policy D12 London Forum **strongly supports** this innovative policy and are pleased that the Government may now introduce legislation and may include it in the draft revision of the NPPF.

Page:	Policy D13 Noise
Section:	N/A

Policy D13 could cover one of the most annoying aspects of noise and that is within buildings. The following should be included. 'Pubs, restaurants and other places for meeting, leisure and shopping should be designed and inspected for the prevention of echoing noise. Conditions should be placed on change of use and on new licences for the fitting of acoustic facilities that will reduce the volume and impact of sound generated by people talking and by 'background' music being played.'

Page:	Policy H1 Increasing housing supply
Section:	N/A

Policy H1 should have something in it about the split of housing types, sizes and tenures, if only the headline messages.

The lack of homes to rent at prices people on low to medium incomes can afford is one of the biggest problems in London. Policy H1 is for increasing housing supply and should have content that makes that quite clear. For years, the wrong type of housing has been delivered.

The Mayor's annual monitoring reports have shown:

- an excess of delivery of market housing compared with need and the ability of Londoners to afford to buy them. Many have been sold off-plan to overseas buyers as investments and left empty.
- delivery of less than half the affordable housing that has been required.

Policy H1 needs an additional section in its part A, as follows.

'Boroughs should plan for the mix and type of homes sought within the total housing targets. Completions of affordable housing of the types described in the Mayor's Affordable Housing and Viability SPG are important and the necessary 65% affordable housing within the overall housing targets should be sought in local plans and in decision making. See paragraphs 1.4.3 and 4.5.1 and Policy H5 on Affordable Housing.'

H1 B 2) a) et al: Use of 800m catchments:

"Sites with existing or planned public transport access (sic) levels (PTALs) 3-6 or which are located within 800m of Tube station, rail station or town centre boundary"

This appears in a number of locations:

- it is not consistently expressed – sometimes not including "rail stations";
- It also needs to be clear that the 800m distance is <u>actual walking distance</u> not crows-flight distance – barriers need to be factored in; but above all
- the distance should not always be from the boundary of a town centre, but, where the town centre is linear and contains mainly secondary frontages at the "periphery", it should be measured from the primary retail frontages of the centre - this should be about access to a wide range of services (see for example Fulham Town Centre which was expanded to include North End Road as far north as Lillie Road – this is an example of abuse of the FALP Density Matrix)

H1 B 2) a) change "boundary" to "primary retail frontages"

Action: See Policy H1 B 2) a), H2 D 2, para 4.2.5, and Map 4.3 – which only refers to London Underground stations for access to transport and that should be corrected.

Action: Policy H1 B (2) (a) after "800m" [and in other references in the New London Plan to 800m to facilities] the words "walking distance" should be added.

Action: Policy H1 B (2) (a) should have an additional sentence on the end - 'See Figure 4.2 for PTAL and the Glossary for details of where PTALS for each location can be found. See also Figure 4.3 for proximity to town centres.'

Policy H1 section D should have added after "Table 4.1" the words 'and the affordable housing content to meet their local needs.'

Following **Policy H1 E** (which seeks to exploit increased public transport accessibility) there should be an additional paragraph as follows.

'Where PTALs are below 2, boroughs should consider restricting or phasing development or limiting housing density until PTAL levels can be improved in order to avoid congestion on existing public transport and roads.'

Policy H1 should have an additional section following E

"Density of new housing should be constrained if local social infrastructure is inadequate to support additional residents until improvements can be delivered. See Chapter 9: Social Infrastructure"

Paragraph 4.1.2 does not appear to be correct. It states that "boroughs are not required to carry out their own housing needs assessment", yet they have to decide what type of housing is needed and where in order to seek the percentage of affordable housing types that they are required to decide upon from the total affordable housing, as in Policy H7 A 3) and paragraph 4.7.2.

Paragraph 4.1.4 summarises the content of the Mayor's Housing Strategy, but there should be additional words "See the Mayor's Affordable Housing and Viability SPD, Table 4.3 and the text that follows it for the types and quantities of affordable housing needed."

Figure 4.2: **Public Transport Access (sic) Levels:**

The PTAL Map appears with no explanation or cross-reference in the text.

Action: The map should be in Chapter 3, in relation to Policy D6: Optimising housing density. Page 151 is far too late in the plan when the location and accessibility to public transport is so central to the strategy of exploiting/making best use of land in these locations. It fails to give that requirement the essential priority necessary.

It will also need cross-references to this map wherever public transport accessibility levels are referred to – para 1.2.4; Policy GG2: B and F; GG5 G; Throughout Chapter 2, including para 2.06; Opportunity Areas; para 2.1.22; CAZ; SD6 - SD9: town centres; and is the starting point for Chapter 3: D2 and especially D6.

There should be a reference with it to an entry on PTAL in the Glossary which has warnings about public transport "A limitation of PTALs is that they only reflect access to the public transport network, but not the opportunities and services reachable through the network.".

Policy H2 Small Sites includes "presumption in favour" for "underused sites" and "infill development within the curtilage of a house", without any reference to the level of public transport.

Policy H2 states that 'presumption in favour means approving small housing developments which are in accordance with a design code'. Although the London Plan Team intend to produce guidelines for the preparation of 'design codes', these will not be available before the end of the consultation period. It is therefore impossible to assess how effective they may be in protecting elements of the character of the area that are important to local residents. In addition, 'where there is no such design code, the presumption means approving small housing development unless it can be demonstrated that the development would give rise to an unacceptable level of harm to residential privacy, designated heritage assets, biodiversity or a safeguarded land use …'.

These criteria are both difficult to measure and not comprehensive. They do not reference harm to the character of the area in terms of architectural design, loss of trees and greenery, loss of views and light. They do not reference harm in terms of flooding and waterlogging. They do not reference harm in terms of congestion.

Presumption in favour where there is no design code must be balanced by a better defined and more comprehensive set of compliance criteria.

London Forum considers the ability of boroughs to develop and publish design codes for identified locations is limited by lack of resources and skills.

What are 'underused sites' referenced in Policy H2? A garden may be an important local amenity for wildlife, mature trees and local drainage. Just because it has not been built on it does not mean it is underused.

Back gardens are recognised in the National Planning Policy Framework (NPPF) in Chapter 6, paragraph 53, which says that "Local planning authorities should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area". **That should be reflected in Policy HS2**.

The adverse effect of back garden development on areas where the back gardens in a street or neighbourhood together create a larger haven for wildlife and other biodiversity, as well as affording some mitigation for poor air quality and benefitting the quality of life of the residents, should be protected in considering applications, particularly where such development is cumulative.

Given that nearly 40% of new homes across London are planned to be on small sites (and up to 78% in some outer London Boroughs), there is a clear conflict between these statements. Presumption in favour should only apply for small sites in the most accessible and well-connected places.

Paragraph 1.2.3 infers that appropriate locations are 'places where local amenities are within walking and cycling distance, and public transport options are available for longer trips'. However Policy D6 'Optimising Housing Density' states in paragraph 3.6.2 'It will not be normally necessary for minor developments to undertake infrastructure assessments or for boroughs to refuse them on the grounds of infrastructure capacity'. **This could lead to the construction of a quarter of a million new homes on incremental small sites without any infrastructure assessment. This is of significant concern to London Forum and its community group members**.

What are 'appropriate locations' and 'the most accessible and well-connected places'? Several New London Plan policies quote 'public transport accessibility levels (PTALs) 3-6 OR located within 800m of a Tube station, rail station or town centre boundary (should be main town cedntre frontages)' as the definition of accessibility. If there is no consideration of PTAL, a rail station with 3 trains per hour, no regular bus service, and in PTAL 1b, is treated for planning purposes in exactly the same way as a Tube station with 20 trains per hour and good bus inter-connectivity in PTAL 6b.

This is totally unrealistic, and if unchanged, would lead to development in areas without adequate public transport, resulting in an increase in car use; an unintended consequence of poorly worded policies and in direct conflict with the 'Mayor's target for 80% of all journeys to be made by walking, cycling and public transport'.

"Appropriate locations" should be more appropriately defined, for example as 'public transport access levels (PTALs) 3-6 AND located within 800m walking distance of a Tube station, rail station or town centre.

The cumulative impact of increasing density and small site development must be covered by additional robust and definable policies that assess both local amenities and accessibility.

"Presumption in favour" should apply only for small sites and increasing density in places where there are <u>adequate</u> local amenities. A definition is required of the minimum set of local amenities necessary for presumption in favour of approval to be appropriate.

Policy **H2 D 1)** would suffice for development of sites that deliver sufficient land without adverse effect from development of one or more houses, as required by paragraph 4.2.8. Back garden development should not be encouraged unless the plots are large and can be divided with their own access. **The Policy should make that clear**.

Policy H2 D 2) should have "town centre boundary" in its opening section replaced by "'town centre primary shopping frontages".

For **Policy H2 D 2) (c) and H2 D 3)** London Forum is <u>very concerned</u> about the implications this is likely to have for conservation areas and the public realm that makes a place special. We note however the statement in para 4.2.7 about conservation areas and the words "designated heritage assets" in Policy H2 E which includes conservation areas according to the NPPF should protect conservation areas that ought to be changed only in accordance with their management plans.

Policy H2 D (2) (d) London Forum is concerned about infill development within the curtilage of a house being given a presumption in favour, if it would encourage the loss of green space would be contrary to the policies for urban greening.

There is a possible conflict in **Policy H2 D 2) b)** for home extensions with **Policy H2 F 3)**, which states that there should be net additional housing, plus **Policy H2 F 5)** for additional housing to be self contained. That would imply that home extensions must deliver a self-contained annex or flat for sale or rent. **That needs clarification**.

Policy H2 D 2) b) should state that as a condition. There should be an additional paragraph of explanation following Policy H2 as follows:

"The increased density achieved by Policy H2 D (2) (b) and (c) should deliver additional homes wherever possible. Residential conversions should be achieved in a way that ensures Houses in Multiple Occupation are of suitable construction and contain dwellings of size that accords with local policies and will offer security of tenure and are monitored by boroughs.'

Page 151: Figure 4.3 - Proximity to town centres - is not easy to read. It should be half a mile from the <u>centre</u>, not the edge. The PTAL map and statistics in Figure 4.2 is explained as being available to boroughs at a local level from the GLA web site for application in determining planning applications. Such information on proximity to town centres should <u>also</u> be available from the GLA at a local level and the source should be given in the New London Plan. (see comments above on Policy H1 B 2) a), et al).

Policy H2 H may be in conflict with Policy H5 B and paragraph 4.5.5 for developments involving more than 10 units or over 1,000sqm.

Paragraph 4.2.5 should have "town centre boundary" in its second line replaced by 'town centre primary shopping frontages'.

Paragraph 4.2.5 The last sentence of should be replaced by "This should be done in consultation with local people and in a way that does not harm the qualities that make places special for the community nor the setting of heritage assets."

Paragraph 4.2.5 should be followed by an extra paragraph 'Conversion of homes into **Houses in Multiple Occupation** should be monitored to ensure space and living standards are satisfactory and there is not overcrowding in them.

Paragraph 4.2.9 - The loss of garden land, an acknowledged extremely important resource for biodiversity in Greater London, would not be "mitigated" by green roofs and street trees – these items should be in addition to green space and not a replacement for that amenity.

Paragraph 4.2.11: London Forum **supports** this "policy" on amalgamations. This should be made into a policy with H2.

Paragraph 4.2.12 is **supported strongly** if there are sites available where it can be utilised. The text should be extended as follows:- "Developments for which it is not achieved should be referred to the Mayor."

London Forum is concerned that the figures in Table 4.2 of around 1,000 homes annually for ten years on small plots of land in some outer London boroughs would seriously adversely affect the amenity of surround residents unless their rights are defended in development control decisions. There could be more strain on local infrastructure if that is already overloaded.

Page:	Policy H3 Monitoring housing targets
Section:	N/A

Policy H3 should have an additional section, as follows.

'Boroughs should monitor and report the percentage of new homes delivered that are affordable within the types detailed in the Mayor's Affordable Housing and Viability SPG and Policy H5. They should monitor and report on new-build housing which does not meet objectively-assessed need, such as second homes, investment property and "buy-to-leave" properties, which reduce the amount of completions that meet the objectively-assessed need for homes for Londoners.'

Page:	Policy H5 Delivering affordable housing
Section:	N/A

In **Policy H5** the figure of 50% in various places is wrong. According to paragraphs 1.4.3 and 4.5.1, 43,000 or 43,500 new homes annually should be "genuinely affordable." That is 65% or more of the 66,000 additional homes required each year as shown in Table 4.3. One of those two numbers for annual affordable homes should be changed so that the same figure is used throughout the Plan.

There should be explanation in or with Policy H5 on how the 15% shortfall of affordable housing between the Mayor's aim for 50% and the SHMAA need of 65% will be planned and delivered. Leaving it to the boroughs to decide what type of affordable homes should be delivered in 40% of the total (Policy H7 A 3) is unlikely to make up the shortfall, particularly if developers continue to exceed the 35% that is supposed to be the figure for market housing in new developments.

In **Policy H5 A 4)** there is an unrealistically low and unacceptable target of 50% of affordable homes on publicly-owned land. The figure should be 75% minimum. If land that developers have bought at land values reflecting its potential for housing can deliver 50% affordable homes, then publically-owned land which is at existing use values and developed as such should be able to deliver higher percentages of affordable homes.

In **Policy H5 B** there should be more requirements on how boroughs must plan for affordable housing. London Forum proposes that in H5 and H6 there should be modified parts of Policy 3.11 B and C of the existing London Plan (FALP). The current FALP policies on this subject with which the boroughs are working should not be weakened in the New London Plan, as continuity is important.

Page:	Policy H6 Threshold approach to applications
Section:	N/A

In **Policy H6 B (1)** the figure should be at least 40% and should be reviewed one year after the New London Plan is introduced, not "in 2021" (Policy H6 B 3). The threshold of 35% affordable homes for the Fast Track Route would be too easy for developers of many sites and is below the target set by some boroughs. It is therefore allowing fewer affordable homes to be delivered than could be achieved by those boroughs.

Policy H6 B should specify a minimum proportion of low-cost rented housing within any scheme.

In Policy H6 B (2) the figure of 50 per cent affordable housing for public sector land is not a sufficiently challenging target. Such land should be developed at existing use values and should deliver at least 75% affordable housing as a lot of it is under the control or influence of the Mayor. In addition, the types of affordable housing delivered on public sector land should be predominantly a mix of the lowest cost rent homes (general needs rented accommodation) and London Living Rent homes. Shared ownership affordable homes should be supplied on other sites, not on public sector land.

As explained in paragraph **4.6.5**, public sector land should deliver the homes that are needed by "London's essential workers." Most of them will be on incomes that would allow them to rent only low-cost homes. The figure of 50% in paragraph 4.6.5 should also be "at least 75%." Public sector land should be developed by TfL and by boroughs and not sold to house builders. The EUV+ for public sector land should be a minimum site premium.

Policy H6 B should have the word "and" after H6 B 1) and 2)

Policy H6 B (3) the figure should be increased to 65% because industrial land is at low existing values.

Policy H6 J should have "change" in line 2 changed to "reduce".

Paragraph 4.6.5 should have '65 per cent' instead of "50 per cent"

Paragraph 4.6.5 should have "education, construction workers," added to the list of potential key worker types.

Page:	Policy H7 Affordable housing tenure
Section:	N/A

According to the 2017 SHMA findings, 47% of the new housing annually needs to be for "low-cost rent", but Policy H7 A (1) requires development to provide only "a minimum of 30 per cent low-cost rented homes" plus an additional amount to be determined by each borough, based on local needs. The gap could be impossible to meet by the negotiation of boroughs.

Policy H7 A (1) 30% should be changed to 40%.

Policy H7 A (3) 40% should be changed to 30%.

Policy H7 or its supporting text should have details on how boroughs should set their affordable housing targets including the types described from paragraph 4.7.3 onwards.

There should be a policy section similar to Policy 3.11 B in the current London Plan, as follows:

"Boroughs should set an overall target in Local Plans for the amount of affordable housing provision needed over the plan period in their areas and separate targets for:

• London Affordable Rent; and

• London Living Rent; and

• intermediate housing and reflect the strategic priority accorded to provision of affordable family housing and to making the best use of available resources to maximise affordable housing output."

Para 4.7.4 should have added after "social rents" the words "below 30% of net income for people in the lowest quartile of incomes in each locality."

Para 4.7.6 Add the words "At least 50% of shared ownership units provided within a development should be affordable by households on annual incomes below £45,000."

Para 4.7.8 Add the words "At least 50% of intermediate rented units provided within a development should be affordable by households on annual incomes below £45,000."

Para 4.7.9 encourages boroughs "to ensure that intermediate provision provides for households with a range of incomes below the upper limit." To ensure this objective is achieved, it is necessary to reintroduce the requirement (as in the 2008 London Plan) that "Half of provision should be for households below a specified mid-point in the income range' (which was £35,600, but which now would be somewhat higher). "

Paragraph 4.7.8 describes the 18% intermediate types of homes in the SHMA as "London Living Rent and Discounted Market Rent". However, Discounted Market Rent is not used as a description of affordable housing tenure in **paragraph 4.7.3**. This should be clarified.

If not enough low-cost rented homes are delivered, the backlog of unmet need for them would grow and there would not be enough homes in London that most key workers could afford to rent. That would damage London's economy.

Paragraph 4.7.8 gives the income level for London Living Rent homes as "up to £60,000" which is too high. It should state that "A percentage of the London Living Rent homes supplied should be suitable for households with an income around £45,000."

Page:	Policy H8 Monitoring of affordable housing
Section:	N/A

Policy H8 A should have "are required to" replaced by "must (see H8 D)"

Policy H8 A has the words "generally only" which are not clear and should be replaced by "exceptionally"

Page:	Policy H10 Redevelopment of existing housing and estate regeneration
Section:	N/A

Policy H10 refers to the need to maintain equivalent "floorspace" in developing existing housing. That is an unacceptable measure because it could result in a net loss of affordable homes, if larger units are built to replace existing ones. The policy should require, instead, that there is "no net loss in the number and type of housing units as a result of redevelopment."

Policy H10 C has the words "where social housing is lost", but there should not be such a loss. The aim in estate regeneration should be better use of land and intensification which should deliver a net increase in social housing units. That is particularly important because almost 80% of the backlog of unmet need in London for affordable homes is for low-cost rented ones and the SHMA shows 30,972 low-cost rent homes (47% of total) are required annually.

Policy H10 needs an extra section: "Any redevelopment of existing housing, whether privately or publicly owned should result in the delivery of more of these types of homes than were there before."

Paragraph 4.10.2 first two bullet points are badly worded and there is duplication.

Paragraph 4.10.2 third bullet point is a good one, but additional bullet points should be added as follows:

- creating social-rented homes of higher quality and safety standards,
- utilising the estate space in a better way,
- adding to community facilities, and

integrating the estate more into its surroundings.

Page:	Policy H11 Ensuring the best use of stock
Section:	N/A

H11 B: This needs to be strengthened beyond seeking to ensure stock is occupied.

London Forum **strongly supports** these measures to "recover" these elements of the stock which are reducing the amount of housing available to meet objectively-assessed need – vacant dwellings and "buy-to-leave", especially newly-completed stock, which never enters full-time occupation, and holiday rentals which diminish the stock.

Policy H12 B seems to be in conflict with Table 4.3 for 2017 SHMA which suggests that 55% of the need for new housing is for one-bedroom units.

Para 4.12.4 also supports the need for one and two-bedroom units for households wanting to downsize.

Policy H12 C and para 4.12.2

London Forum **objects strongly** to the prescription that "boroughs should not set policies or guidance that require set proportions of different-sized (in terms of number of bedrooms) market or intermediate units to be delivered."

Our experience is that in some areas (especially in Central/Inner London), left entirely to the market, developers deliver a high proportion of large units (3 or more bedrooms) which appeal to an overseas investor market rather than producing a mix that would meet the needs and, in particular, affordability for households needing a "primary residence" (aka a home). It is, therefore, totally inappropriate to impose such policies or guidance in Local Plans.

Paragraph 4.12.7 for Houses in Multiple Occupation there should be an extra sentence 'Boroughs should monitor the registration of landlords and the quality of the accommodation provided. They should also take action where there is overcrowding.'

See the comments made elsewhere in our submission about the success of LB Newham in that respect.

Discounted Market Rent (DMR) should be described in the Glossary.

Provision should be made in Policy H13 for Build to Rent developments to include homes to rent that are below the rent of the Discounted Market Rent (which "should be affordable to households on incomes of up to £90,000", as in paragraph 4.7.8). Build to Rent should be able to deliver a few homes at rents suitable to those earning £60,000 annually or less.

Paragraph 4.13.6 allows that flexibility. Clearly, Discounted Market Rent homes are not at a "genuinely affordable rent" for most people and the word 'genuinely' should be deleted from Policy H13 A.

Policy H13 B (2) states that there should be a "covenant for at least 15 years". That is supported. However, the Government has implied that Build to Rent is a stepping stone to home ownership and the Right to Buy should apply after ten years. There is no implication of that in this draft New London Plan but the last section of section A of Policy H13 should state that 'Affordable housing delivered by Build to Rent should be secured in perpetuity as homes to rent.' To Policy H13 B should have added an additional criterion 'the homes should not be sublet at any time or attempted to be sold on the open market.'

It is of concern that **paragraph 4.13.11** allows CIL relief because all housing developments need to contribute to the social and other infrastructure that their occupiers need.

The requirement in **paragraph 4.13.12** that boroughs could be "supporting institutional investment on public land, including exploring the use of joint ventures or deferred receipts." is supported but the word "can" in line one of paragraph should be replaced by the word 'should'.

Page:	Policy H16 Gypsy and Traveller accomodation
Section:	N/A

Paragraph 4.16.2 third bullet point should be changed at the end to ', women and single parents.'

Page:	Policy H17 Purpose-built student accommodation
Section:	N/A

Policy H17 should contain a description of how a "student" should be identified.

Page:	Policy H18 Large-scale purpose-built shared living
Section:	N/A

Policy H18 A g) "bedding and linen changing" should be removed as it would raise expectations and demands of those renting such accommodation.

London Forum **strongly supports** Policy H15, particularly the greater clarity in H15 C and para 4.15.3 in distinguishing between:

- sheltered accommodation and extra care accommodation (C3); and
- residential nursing care accommodation – aka care homes (C2)

Policy H15 should have an additional section to state 'Boroughs are required to calculate the need for specialist housing in each part of their areas and designate sites in or easily accessible to town centre main shopping parades. Planning consents for other types of development on these sites should be refused.'

Policy H15 D should have a further section to state 'Boroughs should include in their Annual Monitoring Reports the percentage of the target number of specialist C3 housing they have delivered against the targets in Table 4.4.'

Paragraphs 4.15.1 and 4.15.9 indicate the large size of the requirements for specialist accommodation for elderly people and those with dementia. There should be an SPG on this subject.

The policies in this chapter should be better cross-referenced to Policy D6: Optimising housing density.

This chapter does not distinguish between:

- **Local social infrastructure** – which is part of the supporting infrastructure of services, amenities and social infrastructure which should be within easy walking distance, within or close to a community/neighbourhood, such as a primary school, nursery, GP surgery, post office
- **Non-local social infrastructure** – which requires relatively easy access by public transport, bicycle or car, such as a secondary school, clinic/group practice, swimming pool, sports facility, library, town hall

These facilities have different accessibility requirements - securing a wide range of services and amenities within walking distance, supports:

- Social inclusion;
- "Healthy Streets"; and
- reducing the need to travel, especially by car. (see para 5.1.8)

Making the best use of land must include harnessing growth to create strong, inclusive walkable communities – it must be built in <u>not</u> a bolt-on extra – need for changes to reflect this.

Need more cross-references to <u>local</u> social infrastructure, services and amenities that would support strong, inclusive and walkable communities so as to integrate this chapter with the wider aims of the London Plan. This chapter seems to feel very free-standing.

Need for a more proactive approach: Higher densities support a wide range of services, amenities and local social infrastructure, but this will only be realised if the planning of these items is an integral part of creating strong and inclusive communities and not just making the best use of land purely to generate more housing – we are trying to create sustainable communities not just housing estates.

Need for guidance on access to local social infrastructure, services and amenities as an integral part of developing strong, inclusive sustainable, walkable communities - need an SPG on Strong and Inclusive Communities.

London Forum **strongly supports** Policy S1, although it needs more emphasis on the local, neighbourhood dimension and consideration of the points above.

In particular, we support:

- the proposed resistance to the loss of local social infrastructure and the proposed sequential approach to the release of redundant social infrastructure in Policy SI1F and G, and supporting text paras 5.1.4 and 5.1.5.

- the emphasis on social infrastructure being easily accessible by walking, cycling and public transport (para 5.1.8);
- the encouragement for shared use and co-location of facilities (para 5.1.8); and
- bringing unused or underused facilities back into use (5.1.9).

In **Policy S1** there should be a cross-reference to GG1.

Policy S1 A should have added the words 'Boroughs' Development Plans are required to identify sites to meet the projected needs for education and other social infra-structure without including sites where air quality is unacceptable or any sites in the Green Belt or on Metropolitan Open Land.'

Policy S1 B should have added "Co-operation with neighbouring local authorities will ensure that social infrastructure is considered on a wider area than each borough." See comment on paragraph 5.1.3 below to support that. In Policy S1B or in a supporting paragraph add

Policy S1 E: Wrong order – compare para 5.1.8 – The words should be "walking, cycling and public transport."

Policy S1 G: London Forum **strongly supports** this policy and the process described in paras 5.1.4 and 5.1.5 to avoid losses of local social infrastructure uses. Compare the sequential approach to releasing social infrastructure in the Kensington and Chelsea Local Plan: Policy CK1: Social and Community Uses. Boroughs should be encouraged to adopt local policies to resist the loss of social infrastructure adopting the approach outlined in paras 5.1.4 to 5.1.9.

Paragraph 5.1.3 is inadequate in its scope. It should propose that boroughs consider social infrastructure across local authority boundaries. It should have added the words 'Boroughs should consider social infrastructure assessment and enhancement in co-operation with adjoining local authorities within and (for outer London boroughs) with planning authorities around London.' That will ensure that a sub-regional view is taken of the facilities that residents will require and access to them is reviewed across LPA boundaries. Progress in meeting social infrastructure needs should be included in boroughs' annual reports.' That would make it similar to Policy S3 A 1) for education and childcare facilities.

Paragraph 5.1.4 lacks a criterion for social infrastructure replacement.
At the end of " . . neighbourhood it serves" add 'and is no further or difficult to reach than
the facilities lost.'

In **paragraph 5.1.8** and elsewhere there should be some recognition of the safety/security issues if school facilities are opened to the wider community. Policy S2 Health and social care facilities / S2 Policy S2 is supported strongly but it should be more prescriptive because if health and social care facilities are not provided where they are needed a development proposal should be refused.

Para 5.1.9: London Forum **strongly support** the concerns about need to provide premises suitable for voluntary and community organisations, but considers that there is a need for a policy within Policy S1 and/or within Policy E1 in Chapter 6, as unused or underused offices can be a useful source, although increasingly these are being converted to housing under permitted development rights. Premises for voluntary and community organisations is now becoming a critical issue in many boroughs.

Page:	Policy S2 Health and social care facilities
Section:	N/A

Policy S2 Health and social care facilities

London Forum **strongly supports** the much more proactive approach to secure **local** needs and the emphasis on them being easily accessible – however, in the wrong order – it should be by walking, cycling and public transport as in paragraph 5.1.8. We **welcome** the proposal that Boroughs should identify sites for future provision (S2 A 4))

Policy S2 A should have an additional section 6) "recognise that pharmacies are a part of local health infrastructure and should be supported in local policies."

In **Policy S2 C:** Change to:

"New local facilities should be located where they are easily accessible on foot, cycling and by public transport. Boroughs are required to plan positively to identify accessible locations."

The STP process, like the issue of GP surgery closures, needs a more proactive approach by Boroughs to produce new practices in more accessible locations. This is a missing element. Instead of a reactive approach, the text of Policy S2 should have an additional item after 1) as follows 'Boroughs should plan positively to influence the location of new surgeries. See NPPF para 70.'

The STPs is a short-term initiative – we need to be planning proactively for the pattern of primary health provision over the next 10 years at least to ensure that new, reconfigured provision is located in accessible locations, such as town centres as part of any major development.

In **paragraph 5.2.2** Add at the end of the third bullet point "taking into account Policy HC1."

Paragraph 5.2.6 contains a key statement and needs cross-referencing with/to Policy D6.

Paras 5.2.1- 5.2.9: There needs to be a new paragraph which assigns a proactive role for securing GP practices in accessible locations, to match the headline message in Policy S2 – S2 A sets out the assessment/site identification process.

In **Paragraph 5.29** the following should be added 'Hospital reconfiguration and changes in the key services they provide should balance the effective use of buildings, resources and skills with the requirement to reduce the need to travel, as in Chapter 10.'

Page:	Policy S3 Education and childcare facilities
Section:	N/A

Policy S3 A needs to be cross-referenced to Policy D6 – to ensure that there is sufficient capacity locally to fill gaps and cater for growth

Policy S3 B should express the need to think local first – walk, cycle and then public transport – or distinguish more clearly between primary schools and childcare (local) and secondary schools (non-local) which need to be served by public transport.

Proposal: Rewrite S3 B 2) as 'locate facilities in accessible locations, with <u>primary schools and child care with easy access by walking and cycling and secondary schools having good public transport accessibility.</u>'

There also needs to be more proactive planning of primary and secondary schools rather than "crisis planning" which seems the predominant mode.

Policy S3 A 3) should have added after the word "schools" 'and in other locations,'

Policy S3 Education and childcare facilities lacks a restriction in the planning for schools. It should have in section B an additional item 4) as follows:

'avoid encroachment on Metropolitan Open Land and other green spaces for the provision of schools. See Policy G3 Metropolitan Open Land.'

Paragraph 5.3.4 should have added after the word "schools" 'and in other locations,'

That paragraph's use of the words "where appropriate" differ from Policy S3 A 3) which uses "need". The former is better.

Page:	Policy S4 Play and informal recreation
Section:	N/A

This policy should be presented more explicitly as a local, neighbourhood-level social infrastructure policy as part of a walkable neighbourhood. **This policy fails to spell out this local dimension and the need to plan proactively for this at a neighbourhood level.** See paragraph 5.4.1 and the standard of provision – within 400m of major new developments secured (paragraph 5.4.6)

Policy S4 Play and informal recreation lacks consideration of cross-boundary facilities.

Policy S4 A 1) should have added to the end 'including that which is easily accessible across borough boundaries.'

Policy S4 B 4) has "space" used twice, in different senses. The words "the space more playable" should be replaced by "is more friendly to children and young people."

Page:	Policy S5 Sports and recreation facilities
Section:	N/A

London Forum **supports** this policy, but considers that there is a need to strengthen the no net loss policy (S5 B (4)) to reflect the need for sites for other sport and recreation facilities if no longer needed for the original use.

Note many of these are non-local facilities where public transport accessibility will be important. (Policy S5 B 1))

Policy S5 and the supporting text should be expanded. Different policies may be needed for sports that need lots of land (up to golf courses) from those which need only a smallish building (e.g. squash), and perhaps for those which are open to everyone (whether free or not) and those which are limited to members. **There should be reference to exercise centres** which are virtually ignored in the present draft save for parking. They are different to the sports halls mentioned in paragraph 5.5.2

In **paragraph 5.5.3**, replace "as per" by 'in accordance with'

Page:	Policy S6 Public toilets
Section:	N/A

London Forum supports this policy.

Page:	Policy S7 Burial space
Section:	N/A

London Forum supports this policy.

Page:	Policy E1 Offices
Section:	N/A

Policy E1 for offices lacks mention of an important type of workspace – premises for voluntary organisations. See para 6.3.1, but also para 5.1.9 although there is no policy in Policy S1 to secure this and there should be, otherwise essential elements of social services may be lost.

Policy E1 B should have added 'including work space for voluntary enterprises that are part of the social infrastructure services in the area. See Policy E3 for affordable workspace.'

Policy E1 C and D: London Forum **welcomes** the recognition that it is not only public transport connectivity that matters but **public transport capacity**.

However, there is insufficient recognition of the public transport capacity constraints in this chapter and in the plan generally, except for paragraphs 2.1.1 and 2.1.11 (Opportunity Areas), Crossrail 2, 2.4.1 (CAZ), SD8 B (4)(c) (town centres).

The inconsistent treatment of capacity constraints in the previous density policy, risks being replicated in the current density policy (D6), because of its focus being entirely about individual housing sites. Policy D6 A (3) merely talks of "the capacity of surrounding infrastructure" and D6 B mentions "the capacity of existing and planned physical, environmental and social infrastructure to support new development", which is then elaborated in D6 B 1) - 3). Public transport capacity constraints, especially at mainline stations in CAZ has been glossed over, as have the problems of certain Opportunity Areas, if they were ever built out (eg Earl's Court/West Kensington).

This must be given attention in this New Plan.

Policy E1 D: London Forum **welcomes** the recognition of the role of Outer London town centres to absorb the growth suggested in Table 6.1, where 23% of office employment growth is projected to be in Outer London. This marks a movement away from what was alleged to be a Zone 1 plan for offices.

Policy E1 E and F: London Forum **welcomes** the support given to the retention of existing viable office floorspace in Inner and Outer London and the Mayor's support for Article 4 Directions.

Policy E1 F should have a firm requirement for the boroughs and the Mayor to perform an objective study of the effects of the permitted development rights of offices and light industrial buildings on industrial estates.

Policy E1 G: London Forum **welcomes** the support given to lower cost and affordable workspace, but there should be a cross reference to Policy E3 C which covers the planning for that workspace.

Para 6.1.2 and Table 6.1: Projected office employment and floorspace: The concept of these projections being "a broad monitoring benchmark" rather than policy is **welcomed.** We also welcome the slight shift to Outer London (23% v 20%) from the 2015 London Plan.

The Opportunity Areas are stated to have the capacity for delivering over 750,000 jobs, compared with the 619,300 additional office job projections in paragraph 6.1.2. It seems surprising that there will be a high number of non-office jobs by 2041 implied by the difference between those figures.

Page:	Policy E2 Low-cost business space
Section:	N/A

Paragraph 6.2.2: London Forum is concerned that low-cost business space and workspace, that is often critical to supporting the SME sector and plays a significant role in the local economy of town centres, especially on the upper floors or at the rear of shops, should not be lost to other uses, especially housing.

We are also concerned that when edge-of-centre or town centre redevelopment takes place that the co-location principle as proposed for SILs is applied **and** that the replacement space is affordable.

Those should be emphasised.

Policy E2 B 3) should have added the word ', cost' after "use" in the second line.

6.2.3 The second sentence is obscure. The words "This policy" should be changed to 'Policy E2.'

6.2.3 London Forum **strongly supports** the use of Article 4 Directions to protect office floorspace from being converted to housing using permitted development rights.

Page:	Policy E3 Affordable workspace
Section:	N/A

London Forum **strongly supports** this policy.

In **Policy E3 C** the words "are encouraged to" are weak and "should" would be better.

Page:	Policy E4 Land for industry, logistics and services to support London's economic function
Section:	N/A

London Forum is **concerned** that this version of the London Plan has moved further away from designating potential strategic logistics/consolidation/breakbulk facilities. Without identifying sites and having a strong strategic approach nothing seems to happen. **The New Plan must address this**.

Policy E4 A add the words "and additional requirements planned – see paragraph 6.4.6" after the word "maintained" in line 3 of the opening section.

Policy E4 A 2) the word ",break-bulk" should be added after "consolidation".

In **Table 6.2** the Property Market Area of "Park Royal/Heathrow" should be changed to some other description, because it contains LB Barnet in North London.

Table 6.3 - Strategic Industrial Locations should have added in the Park Royal/Heathrow part of the list the Power Road Industrial Estate in Chiswick, London W4 which is part of the London Borough of Hounslow's Local Plan alteration for development of the Great West Corridor.

Page:	Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function
Section:	N/A

Policy E7 is supported but a cross-reference to Policy for 'Agents of Change' Policy D12, as in Policy E5, should be added.

Policy E7 has its sections B duplicated in section C, but with slightly different words. Section C should be deleted. That would require a change also to the references to parts of Policy E7 in paragraph 6.7.2.

Paragraph 6.7.3 suggests mixing industrial and residential on the same site when it is not designated as a SIL or LSIS. London Forum thinks that may result in the industrial use being threatened by closure. There should be a cross reference in paragraph 6.7.3 to the safeguards required that are explained in Policy E5 E.

Page:	Policy E6 Locally Significant Industrial Sites
Section:	N/A

London Forum supports Policy E6.

Page:	Policy E5 Strategic Industrial Locations (SIL)
Section:	N/A

London Forum **strongly supports** the new strategy for proactive management, diversification, co-location of business uses and resistance of housing. We support the application of the Agent of Change principle as a guarantee for noisy industrial uses.

In **Policy E5 B 2)** add the words 'better links to public transport' after "improvements".

Page:	Policy E8 Sector growth opportunities and clusters
Section:	N/A

London Forum **supports** a more sector-specific approach to fostering growth sectors and the support for sectoral clusters.

In **Paragraph 6.8.5** the words 'by achieving a critical mass of skills and resources' should be added to the end of the first sentence.

Page:	Policy E9 Retail, markets and hot food takeaways
Section:	N/A

London Forum **supports strongly** this policy – especially the link to socially-inclusive, walkable neighbourhoods which is likely to reduce the need to travel. There needs to be cross-references in Policies D6 (Optimising housing density) S1 (and para 5.18) for social infrastructure, to the benefits of co-location of facilities in town centres, but particularly neighbourhood centres. **This should be a strong, running theme, but it has been lost through fragmentation. Policy SD6 A (6) and SD7 (F) have not really been developed - neighbourhood/local centres as the focus for walkable neighbourhoods.**

Policy E9 C London Forum **supports** the proposed policy for controlling the location of new fast-food outlets**.**

Para 6.9.1: delete "a period of" - constant change is here to stay.

Para 6.9.5 add the words ", charity shops, estate agents," after "pawnbrokers".

Page:	Policy E10 Visitor Infrastructure
Section:	N/A

Policy E10 F is incomplete. It is not only the need to avoid compromising housing provision in the supply of short-term lets, but it is important, as explained in paragraph **6.10.4,** "that the impact such provision can have on traditionally residential areas is addressed." Those words should be in section F of the policy because short-lets can result in such properties being overcrowded and they can be used for parties. That section of the policy should have added also 'Local environmental health officers should respond quickly to any nearby resident's complaint about noise or antisocial behaviour associated with short term lets.'

Sadiq Khan wrote to the Government on his concerns about short-term lets and the London Assembly investigated the issues, led by Tom Copley AM. The Mayor has asked all short-term letting agencies to "ensure that customers of yours who want to let properties in London on a short-term basis for more than the 90-day annual cumulative limit are restricted from doing so through your website, unless they can prove that they have the relevant planning permission."

Policy E10 F should also have words added to require that "Boroughs should check that short-term lets are for a maximum of 90 days", as AirBnB have now agreed to impose. Nevertheless, London Forum would **urge** the Mayor to adopt a much tougher approach to the encroachment of the "sharing economy" on London's housing stock. **A new policy is needed to tackle this issue!!**

Policy E10 contains a desire for serviced accommodation to be maintained and developed both within the Central Activities Zone and in town centres and Opportunity Areas outside it. There is also a wish expressed for tourism to be promoted across the whole city. There is, though, no practical set of measures for achieving this. The emphasis on accommodation in Opportunity Areas that "are well-connected by public transport, particularly to central London" suggests that no significant change in the geographical pattern of usage of visitor attractions is anticipated. **Policy E10 should be amended to cover that.**

Policy E10 should be modified and it, or the paragraphs following it, should have something on the following points: In Chapter 7 reference is made to the four UNESCO World Heritage sites in London, namely Maritime Greenwich, Royal Botanic Gardens Kew, Palace of Westminster and Westminster Abbey including St Margaret's Church, and the Tower of London. St Paul's Cathedral is referred to under the management of views as is Buckingham Palace. The role of the Central London sites as iconic tourist attractions is not specifically considered.

In the "Projections of demand and supply for visitor accommodation in London to 2050" (Working Paper 88) it is noted that, in 2015, of the total of 138.5 million visitor nights spent in London, 78% were from international visitors. 85% of these international visitor nights arose from non-business travel, i.e. leisure visits and visiting friends and relatives (VFR). Growth in both international and domestic visits is projected on a straight-line basis to 2050. What is highly likely is that the proportionate make-up of international visitors will change during this period, notably with higher rates of growth from Asia, notably from China. The number of visits from China to the UK rose by 27% in the first quarter of 2017 as against 2017, an indication of trends to come. For these visitors the iconic attractions contained in central London are of especial importance. Diverting Chinese visitors from Buckingham Palace and the Palace of Westminster, for example, to attractions in outer London will be especially challenging.

Over the last year, the issue of 'overtourism' has come to the fore in the consideration of sustainable tourism. In January 2018, CNN published a list of destinations travellers might want to avoid in 2018. The list includes Barcelona, Dubrovnik and Venice (where UNESCO is threating to remove the World Heritage designation due to extreme overcrowding). The London Tourism Impact Study, prepared in 1989-90 for the London Planning Advisory Committee and the then London Tourist Board, considered the impact of tourism on heritage sites and on the transport system. **Such a consideration seems to be lacking from the New London Plan and from the support documents underlying it**. Measures to control tourism flows are likely to become increasingly essential in order to avoid conflict with London's residents **and should be included in Policy E10**. Such conflicts will detract from London as a destination and render straight line projections of demand implausible. Any loss of reputation reduces the attractiveness of London as a place to live, work and invest.

In the London Tourism Impact Study consideration was given the limitation of visitor flows to key attractions by rationing and/or by price. To date there has not been any coherent response in London, although for the Tower of London, St Paul's Cathedral and for Westminster Abbey there is a degree of rationing by price. Without consideration and implementation of measures to address visitor management, it may be necessary to reduce the rate of increase for serviced visitor accommodation as put forward in the New London Plan. It could even lead to a need to engage in 'demarketing' activities - i.e. an attempt to make London (or parts of the city) less attractive generally (or to certain groups in particular) to make the situation more sustainable.

Paragraph 6.10.1 - While the objective of the distribution of tourists across the whole city is a laudable one, there appear to be no practical measures contained in the Plan to achieve it. Market trends rather point in the opposite direction.

This can lead to the perils of 'overtourism' as already experienced in a number of major European cities. There need to be practical measures to address these risks if London is to maintain its leading position as a tourism destination.

Paragraph 6.10.2: Unlike the current consolidated London Plan Policy 4.5 A(b), which sets a target of 40,000 net additional hotel bedrooms by 2036, Policy E10 provides **no target**, but paragraph 6.10.2 "estimates that London will need an additional 58,000 bedrooms by 2041, which is an average of 2,230 bedrooms per annum."

Page:	Policy E11 Skills and opportunities for all
Section:	N/A

Policy E11 is not as comprehensive as the policy on this subject in the current consolidated London Plan, which, in its Policy 4.12, covers reducing the need for long-distance commuting, building on higher-education institutions, tackling the cost and availability of childcare, addressing labour market discrimination and the mismatch between labour supply and demand in terms of education, skills or other barriers to success in a changing economy, focusing particularly on key target groups and communities living within London's most disadvantaged areas. Also, ensuring that an adequate mix of businesses and public services (and therefore employment opportunities) are provided close to those communities who particularly benefit from local jobs. Cross references were given to key parts of the Economic Development Strategy for getting people into work.

Policy E11 should be enhanced with such policies or the current momentum will be lost.

Page:	Policy HC1 Heritage conservation and growth
Section:	N/A

Although London Forum **supports** a lot that is in this chapter, more is required:

- **the development of a separate heritage strategy for London**
- **the development of height of buildings strategy along the Thames**
- **a review of the strategic views framework**
- **a review of strategic views to prepare additional views/panoramas, especially along and across the Thames**
- **better management of the night time economy, including accreditation through ATCM's Purple Flag scheme.**

Policy HC1 Heritage conservation and growth

As with several other chapters in the draft New London Plan, the heritage policies should have a lead-in set of paragraphs based on guidelines by the Mayor. In July 2017 Built environment conservation adviser Historic England urged the Greater London Authority to develop a new London Heritage Strategy, which would encourage heritage-led regeneration and character-led new development. Historic England said that the strategy should "inform the development and implementation of policies in the new London Plan and other mayoral strategies". The watchdog's report argues that such a strategy should "inform a range of strategic issues that will support the delivery of good growth, from policy to implementation." The report '*Translating Good Growth for London's Historic Environment*' is at http://bit.ly/2FpzOsW

There should be a London Heritage Strategy

Policy HC1 should open with a statement that new development should start from the premise that it should enhance the area in which it is to be built, having special regard for World heritage Sites, Listed and Locally Listed buildings, designated heritage assets and character areas. Particular care is needed to assess carefully any new buildings which break into existing skylines.

Policy HC1 B (3) should have the words 'with responses that may be' before the word "innovative**"**

Policy HC1 B 4) is worded in a weak manner and does not reflect the content of the statutory requirements set out in the relevant sections of the Planning (Listed Buildings and Conservation) Act 1990 [e.g. S.16.(2)] covering listed buildings, or S.72 (1) relating to conservation areas), which require that **'special regard be had to the desirability of *preserving* the building or its setting or any features of special architectural or historic interest that it possesses...' in the first instance, and that 'special attention *shall* be paid to the desirability of *preserving* or enhancing the character or appearance'.. in the latter case.** Given the superior status of provisions in an Act of Parliament by comparison with the NPPF Section 12 which uses the words "conserving and enhancing", the New London Plan should be strengthened by adding this Act's requirements.

For these reasons, **Policy HC1 A** should have its second word "should" changed to 'shall'.

In **Policy HC1 A** or in a supporting paragraph there should be reference to the Planning (Listed Buildings and Conservation) Act 1990 [e.g. S.16.(2)] covering listed buildings and S.72 (1) relating to conservation areas.

Policy HC1 B 4) should have the words "sustain and enhance" changed to 'preserve and enhance'. It should be noted that 'to preserve' was held by the Courts to mean 'to prevent from harm', but still encompasses beneficial change.

Policy HC1 C should have the word "should" in the second line changed to 'must' to meet the requirements of the Planning (Listed Buildings and Conservation) Act 1990. The word "conserve" in line two should be replaced by 'preserve or enhance'.

Policy HC1 C should have at the end 'Consideration should be given to the effect of new development on the skyline.'

Policy HC1 D should have added the words 'Where appropriate archaeological sites should be preserved in situ and be publicly accessible.'

Policy HC1 E - replace the word "should" by 'are required to' Also insert ', in the light of development proposals in particular,' after ". . heritage assets"

In **Para 7.1.2**   Add "railways" after "canals".

In **paragraph 7.1.3** replace the word "from" in line seven with 'by' and replace the word "modern" by 'contemporary' and replace the word "bring" by 'communicate and make clearly legible'

In **Paragraph 7.1.4** the first word 'Many' should be replaced by 'Most'.

In **Paragraph 7.1.4** the words "sustain and enhance" should be changed to 'preserve and enhance'. It should be noted that 'to preserve' was held by the Courts to mean 'to prevent from harm', but still encompasses beneficial change. Also change "boroughs' character appraisals, conservation plans and local lists" to "boroughs' character and context analyses, conservation area appraisals and related management plans, local heritage lists, designated heritage assets and Assets of Community Value" and add "and decisions." at the end of the paragraph.

In **paragraph 7.1.4** there should be a cross-reference to paragraphs 3.2.2 to 3.2.4 in the design chapter, where character appraisals are encouraged, and the welcome idea of digital modelling is introduced. In the penultimate line of paragraph 7.1.4, the words "conservation plans" should be replaced by 'Conservation Area Management Plans'.

In paragraph 7.1.5 Change "understanding of the heritage values of a site or area" to 'understanding of the heritage values of a listed building, designate heritage asset or site or area'

In **paragraph 7.1.5 r**eplace 'as well as local communities' by 'local historical and archaeological societies, as well as the wider local community'. This is important as societies often have members at least as expert as many professionals.

Policy 7.1.6 is supported but after "character of an area" should be put 'The process of securing the adaptive re-use of existing buildings, which embody environmental capital and where environmental impacts have long since been discharged, is inherently sustainable.' Note that as advocated by Lord Rogers in the Urban Task Force Report the historic environment - terraces, squares, crescents, town houses, mansion blocks etc.- provides a valuable template and design indicators for achieving intensification involving significantly higher densities than the norm, without sacrificing the attributes of civilised urban living. That is relevant to the policies of chapter 3.

Paragraph 7.1.6 should become an additional section within Policy HC1

Paragraph 7.1.7 would benefit from having the following words placed at the end of its first sentence "and between the historic asset and its broader context."

Paragraph 7.1.8 should have the words "to help justify" deleted and replaced by "in relation to". **This paragraph should be part of policy HC1 E**.

Paragraph 7.1.9 would benefit from reference to "industrial archaeology and palaeontological remains." Also, it should recognise the fundamental role of Historic England's Greater London Archaeological Advisory Service in all boroughs except Southwark and the City of London.

Figure 7.4 for the Outline Character Map of London is another one that is too small to be read easily. As recommended with the Key Diagram, there should be in a NLP appendix versions of the maps with overlapping quadrants, each printed larger and access to high definition versions of them in the GLA web site for viewing when zoomed.

In **paragraph 7.1.10 t**he first bullet point repeats the last sentence of paragraph 7.1.9.

The last bullet point of **paragraph 7.1.10** is not one - it should be a new line in the paragraph.

In **paragraph** 7.2.4 for consistency it should be 'Tower of London WHS', not 'The Tower WHS' after the words "Tower Hamlets". The paragraph should require Councils to include policies in their Local Plan policies to ensure that applications which adversely impact World Heritage Sites are refused . The Mayor should underwrite this requirement by indicating in this plan that he will refuse such applications.

Figure 7.5 - **Archaeological Priority Areas and Registered Battlefield**

Consideration should be given to including in Figure 7.5 the Brentford and Turnham Green Battlefield of a conflict in the Civil War - see http://bit.ly/2HFR3Hh

Page:	Policy HC2 World Heritage Sites
Section:	N/A

Policy HC2 has content that is well directed and which covers the subject matter in an exemplary fashion, as did the current London Planpolicies: the problem arises over their implementation. The policy has been ignored by boroughs and the GLA and that has led to critical comments by UNESCO's World Heritage Site Committee and ICOMOS about harm to the setting of the WHS of the Palace of Westminster. It should be stated in Policy HC2 that the Mayor will intervene when proposals are submitted that are contrary to policies in this chapter.

Page:	Policy HC3 Strategic and Local Views
Section:	N/A

London Forum is **disappointed** that the opportunity for identifying further strategic views has not been taken since the London Plan is the correct vehicle for introducing further views. There is a strong need to assess the need to protect views along and across the Thames upstream of Lambeth Bridge – where, with the exception of the view from Richmond Park, there are no views from west of this bridge. **Work should start immediately** before it is too late! The various strategies for the Thames should assist in identifying further views or panoramas.

In **Policy HC3** there should be an additional section F 'The Mayor will identify other views that should be considered strategic, particularly ones seen from the west of Lambeth Bridge.

Page:	Policy HC4 London View Management Framework
Section:	N/A

In **Policy HC4 A** London Forum **strongly supports** the principle that "development proposals should seek to make a positive contribution to the characteristics and composition of Strategic Views and their landmark elements." **This needs an explanation in the reasoned justification and a cross reference to Policy D8: Tall Buildings**.

In **Policy HC4 B** Line 1: Add "and background" after "middle ground" – not the same point as HC4 C.

In **Policy HC4 C** the words "external illumination" should be followed by '(see paragraphs 3.7.10 and 3.9.5 on light pollution)'

In **Policy HC4 D 1)** add 'Development proposals in designated views should make a positive contribution,'

In **Policy HC4 D 2)** the reference to River Prospects views requires an additional section in Policy HC4 D 'The frontage riverine industries (particularly in the case of the River Thames) should be protected as they service the water-borne traffic that helps to define the character and appearance of the river corridors and views that are a major element of London's USP (unique selling point).'

Page:	Policy HC5 Supporting London's culture and creative industries
Section:	N/A

The London Forum **strongly supports** this policy, especially HC5 C) 6) with regard to Agent of Change.

In **paragraph 7.5.1** the words 'churches and locations for such activities as chess clubs,' should be placed after "libraries,". Apart from the normal religious and community activities that churches accommodate, they are an important performing and rehearsing venue for music and drama, locations for exhibitions and for events that are ceremonial rather than devotional such as funerals, weddings, state events and carol services.

In **paragraph 7.5.7** the following words should be added at the end 'In seeking to promote events and activities, including commercial events, fairs and circuses, on a range of outdoor spaces a careful balance needs to be struck to ensure that the Royal Parks, local parks and other areas of incidental open space do not have events that occupy more that 15% of their open space, do not reduce access to them nor cause disturbance to residents living nearby.

Page:	Policy HC6 Supporting the night-time economy
Section:	N/A

The London Forum **supports** this policy, and welcomes the emphasis on managing these activities.

Paragraph 7.6.6 stresses the development of management strategies. That paragraph should have an additional sentence 'Boroughs, working with their local night time economy sector, should seek accreditation through ATCM's Purple Flag scheme.'

In **paragraph 7.6.7** the following words should be placed after "museums" 'providing it did not require entrance fees that would discriminate against those on low incomes.'

Page:	Policy HC7 Protecting public houses
Section:	N/A

London Forum **strongly supports** this policy, which provides the most comprehensive framework of protecting public houses to date.

In **paragraph** 7.7.3 the following should be added at the end 'Consideration of the place of pubs in the history of an area should also include a review of their signs, which often give clues as to previous land ownerships or events in history, and may be of historic or aesthetic interest in their own right, and should be retained wherever possible.'

Like several other chapters, this one would benefit from some opening paragraphs to summarise the issues and the objectives that the policies will address on these subjects.

London Forum supports the policies in this chapter.

There should be two additional paragraphs following **Policy G4** regarding borough's assessment of green spaces, as follows:-

'Green spaces can be of poor quality due to redundant buildings, buildings on the 'At Risk' register, hazardous areas, noise intrusion, loss of mature trees and hedgerows, fly-tipping, flooding, vandalism and insufficient play space. Boroughs should plan how to address such problems.' and

'Front gardens and agricultural land should be protected. Off-street parking in front of homes should be restricted. In-fill development proposals should be assessed for the amount of green space that would be lost and provision should be made for an equivalent or more of such space elsewhere.'

The latter could be a section within Policy G4.

There should be a paragraph emphasising the importance of back gardens for green chains, biodiversity and play space and the need to retain most of them and not divide plots under the Plan's Small Sites policy unless the remaining space would be suitable for amenity value and there is no significant loss of open and green space.

Page:	Policy G2 London's Green Belt
Section:	N/A

London supports Policy G2.

Page:	Policy G3 Metropolitan Open Land
Section:	N/A

London Forum supports this policy and welcomes the statement in paragraph 8.3.2 that "The principles of national Green Belt policy also apply to MOL."

Page:	Policy G4 Local green and open space
Section:	N/A

London Forum supports this policy

Page:	Policy G5 Urban greening
Section:	N/A

London Forum supports this policy.

Page:	Policy G6 Biodiversity and access to nature
Section:	N/A

London Forum supports this policy.

Page:	Policy G7 Trees and woodlands
Section:	N/A

London Forum supports this policy but it needs the words 'and in roads that lack sufficient street trees to give shade' after "developments".

Page:	Policy G8 Food growing
Section:	N/A

London Forum supports this policy but in Policy G8 A 1) 'farm land' should be put after "allotments".

Page:	Policy G9 Geodiversity
Section:	N/A

London Forum supports this policy.

Page:	Policy SI1 Improving air quality
Section:	N/A

London Forum supports the policies in this chapter as being very comprehensive. A few changes are suggested, as follows.

Improving air quality Policy SI1 A 4) should have added the words 'Where possible, the movement of deconstruction waste and building materials should be by rail or water.'

Following Policy SI1 should be a paragraph 9.1.9 'The Mayor will act to reduce harmful emissions from the public transport system, particularly buses, as in Chapter 10.

Page:	Policy SI2 Minimising greenhouse gas emissions
Section:	N/A

Paragraph 9.2.4 proposes carbon targets for non-residential developments in the final version of the New London Plan in 2019. Draft proposals for that purpose should be available for consideration before the Examination in Public of this Plan. They should include guidance on reduced carbon use in existing buildings which should be covered by the policy.

Page:	Policy SI3 Energy Infrastructure
Section:	N/A

Policy SI3 should have an additional section E 'The Mayor will work with energy suppliers and stakeholders to address the inadequate electricity supply in the capital and the need for energy centres. Land will be safeguarded for those purposes**.**

Policy SI3 should have in section C as 3) 'Seek the implementation of shared utility ducting systems that will avoid roads being dug up and street trees needing to be removed.'

Page:	Policy SI4 Managing heat risk
Section:	N/A

London Forum supports this policy.

Page:	Policy SI5 Water infrastructure
Section:	N/A

Policy SI5 lacks content for achieving **Sustainable Urban Drainage** which is essential. There should be additional words on the end of Policy SI5 E 'employing sustainable urban drainage to reduce overloading of the sewer systems and local flooding as in Policy SI13.'

In **paragraph 9.5.6** replace the word "should" by 'must' for water trunk main renewal.

The words "Thames Water is also planning a major sewer tunnel in the Counters Creek catchment of west London." in **paragraph 9.5.10** should be moved into **paragraph 9.5.14** with an indication of how that new facility will improve Flow Capacity Utilisation percentage for the restriction on additional flows in LB Hammersmith and Fulham and surrounding areas. Phasing of new development may be necessary until capacity is improved.

It is of concern that, as in **paragraph 9.5.11** "London's tributary rivers suffer significant pollution from **misconnected sewers**. There should be some indication of what will be done to address that problem.

Page:	Policy SI6 Digital connectivity infrastructure
Section:	N/A

Policy SI6: Digital connectivity infrastructure is supported as important for the safety of individuals and for productivity in businesses.

Page:	Policy SI7 Reducing waste and supporting the circular economy
Section:	N/A

Policy SI7: Reducing waste and supporting the circular economy should have in section A 5) the words 'that does not harm the appearance of the public realm and' inserted after the word "space" for waste bin storage.

Page:	Policy SI8 Waste capacity and net waste self sufficiency
Section:	N/A

London Forum supports this policy.

Page:	Policy SI9 Safeguarded waste sites
Section:	N/A

London Forum supports this policy.

Page:	Policy SI10 Aggregates
Section:	N/A

London Forum supports this policy.

Page:	Policy SI11 Hydraulic fracturing (fracking)
Section:	N/A

London Forum supports this policy.

Page:	Policy SI12 Flood risk management
Section:	N/A

London Forum supports this policy.

Page:	Policy SI13 Sustainable drainage
Section:	N/A

London Forum supports this policy.

Page:	Policy SI14 Waterways - strategic role
Section:	N/A

Policy SI14: Waterways – strategic role should continue to describe waterways as the "Blue Ribbon Network", as it has been since the first London Plan of the GLA.

In **Policy SI14** the word "should" in section B is not strong enough and London Forum suggests using 'must'. The words "are encouraged" in the second sentence of B are inadequate and 'must' instead would support the Plan's aim for Thames Strategies for each section of the Thames which is essential fopr development management. It is stated in paragraph 9.14.7 that "No joint strategy currently exists for central section of the Thames (Chelsea-Tower Bridge)." That deficiency must be addressed.

Policy SI14 needs an additional section C with words 'To use waterways to make a reliable contribution to the economy of the capital by their use for freight which would help to maintain their use and effectiveness'.

Paragraph 9.14.2 should have added within it 'a source of water, London's largest open space and a strategically important series of linked spaces' and 'The starting point for consideration of development and use of London's waterways and land alongside them must be the water. The water is the unique aspect and consideration must initially be given as to how it can be used, maintained, improved and how the development would appear from the hinterland and the water.'

Page:	Policy SI15 Water transport
Section:	N/A

Policy SI15: Water transport should have in section B the words 'within Greater London.' after "facilities".

Page:	Policy SI16 Waterways - use and enjoyment
Section:	N/A

London Forum supports this policy.

Page:	Policy SI17 Protecting London's waterways
Section:	N/A

Policy SI15: Water transport should have in section B the words 'within Greater London.' after "facilities".

This is another chapter that would benefit from some lead-in text that explained the current situation on public transport in the capital and the Mayor's aspirations for improvement and the dependencies.

The London Forum **strongly supports** the aspiration to reduce significantly the reliance on the car by 2041, so that overall 80% of trips will be walking, cycling or public transport. London Forum and its community group members, however, consider that, although the projected scale of change should be achieved in Central and Inner London, the projected degree of modal shift in Outer London, from 40% of trips within Outer London being by car in 2015 to 25% in 2041, may be more difficult to achieve. It will rely strongly on growth being targeted to locations with high public transport accessibility levels near stations or close to town centres, where residents will be able to have a less car-dependent lifestyle.

The current reality of how the suburbs 'work' and how people behave is still very car dependent and in areas that are not within walking distance of stations or town centres, it will be more difficult to change people's travel choices. Someone living up to 800 metres from a town centre might be able to travel to and from that centre without a car, but for most residents, travel is far more complex than just one route. They are accessing different services and facilities that are scattered. Once in the car, they use it to visit places and friends that they could have reached without the car.

Nevertheless, London Forum **supports** the direction of travel – to introduce policies and standards that support both the location of higher-density development in areas of highest public transport accessibility (as expressed in the density matrix), but recognises the concerns of residents in Outer London's lower-PTAL areas where on-street parking is not controlled. To achieve a major shift a high proportion of the growth will need to be focused in places with the highest public transport accessibility.

There is a strong need for good practice guidance on what types of development would look like to help communities envision what this would mean and how it would work.

There is nothing in this chapter about parking management in streets and town centres and there should be guidance by Transport for London on the subject, including advice about Controlled Parking Zones, which car-free new developments may cause to be introduced.

Policy T1: Strategic approach to transport

London Forum **supports** this approach, but **proposes** an additional section T1 A 3)

New T1 A 3): a reduction in the need to travel, especially by car, by ensuring that all neighbourhoods seek to ensure a range of local services, amenities and social infrastructure within easy walking distance.

London Forum believes that achieving 80% of all journeys being made by non-car modes by 2041 will be challenging, because suburban residents in areas of low public transport accessibility may even find reducing the share of car journeys in Outer London from 40% to 25% very challenging.

Paragraphs 10.1.1 and **10.1.2** should be more specific.

A replacement first paragraph following Policy T1 should contain the following words:

"The integration of land use and transport means **reducing the need to travel**, especially by car and reducing the distances travelled to achieve a given end – planning for jobs to be near homes, focusing new infrastructure on schemes that encourage shorter distance commuting and ensuring that local services, amenities and social infrastructure are within easy walking distance. See Policy GG2 and Policy D6."

The next paragraph should contain the words of 10.1.1 from 'The provision of a robust….'

At the end of **paragraph 10.1.2** should be inserted the words ', particularly facilities for bus priority.'

Paragraph 10.1.4 should be rewritten to explain "better quality" public transport.

London Forum **strongly supports** this policy

- to promote/facilitate a shift to walking and cycling
- to promote Healthy Streets
- to use improve the balance to space given to people to dwell, walk and cycle

Policy T2 A is not well worded, particularly in the use of "shorter, regular trips" and the emphasis on "residents".

Replace "facilitate residents making shorter, regular trips by walking or cycling" with "that make it more likely that people will walk or cycle."

Policy T2 B 1) and para 10.2.1 should include reference to reducing clutter (which should also qualify the Healthy Streets Indicator "Things to do and see").

Policy T2 B 1) should have the words 'and waste management' after "freight".

Policy T2 B 2) should have ', of better air quality' after "greener".

Paragraph 10.2.5 should have 'and waste collection' after "deliveries".

In **paragraph 10.2.6** replace "further afield will be…" by 'further afield must be…'.

Policy T3: Transport capacity, connectivity and safeguarding

Policy T3 A appears to be a responsibility that only the Mayor can implement and that will need Government support and investment. There is little the boroughs can do to develop transport projects. If they obtain funds for that purpose from developers, it would reduce the quantity of affordable housing that they would be able to provide.

Table 10.1 Indicative list of transport schemes.

London Forum would expect to see earlier finish times for retrofitting cleaner buses and for the Overground extension to Barking Riverside.

We do not believe the Mayor should be promoting an extension of the Elizabeth Line east of Abbey Wood to Ebbsfleet. The objectives could be more cost effectively met by opening Stratford International platforms.

We are disappointed not to see the Croxley link included in this table. Like the eastward extension of the Elizabeth Line and the extremities of the proposed Crossrail 2, the Croxley link lies outside the Greater London boundary but, unlike them, it benefits directly Londoners by increasing the efficiency of an existing line. Moreover, it can be delivered relatively speedily.

London Forum **supports** the provision of a north-east to south-west Crossrail 2 service. Overcrowding is far greater on lines from the north-east than the north, so we believe the reference to Hertfordshire should be replaced by "Essex".

There is no equivalent in Table 10.1 of the entry in the current London Plan Table 6.1 page 239 for the expansion of car clubs, even though Policy T6.1 D refers to them. Until public transport can be improved, car owners might be persuaded to give up their own vehicle if there were ease of access to short term hire facilities for cars and vans. The benefits are explained in the Mayor's Transport Strategy.

A line should be added in Table 10.1 'Facilities in streets for car and van club bays'.

There should be an additional paragraph similar to the one in the current London Plan 'The Mayor, through TfL, and working with the London boroughs, car club operators, and other stakeholders, will support expansion of car clubs'

There should be an entry in Table 10.1 for 'Tackling congestion areas', as in the current London Plan FALP page 240.

References to improving rail freight routes in the current London Plan have been dropped, without explanation.

The detailed 17 rail improvements on page 232 of FALP have been reduced in the Draft LP to a single line "National Rail capacity increases (other lines)". There should be a cross reference to the location of detail per rail line in Transport for London documents.

The same applies to the Underground improvements detail in FALP on pages 233 and 244 which in the NLP are just a single line "London Underground upgrades - various".

There should be another entry in Table 10.1 for 'Improvements in gyratory and for bottlenecks', as in the current FALP London Plan page 240.

There is no entry in Table 10.1, as there was in the current London Plan, for "Greener Streets" with defined projects for improvement. It should have cross reference to Policy G5.

Following the entry in Table 10.1 "ULEZ London-wide for buses, coaches and HGVs" there should be an item for 'ULEZ London-wide for cars and vans with high emissions'.

There is no entry in Table 10.1, as there was in the current London Plan, for "Greener Streets" with defined projects for improvement.

Road pricing for the future is in Table 10.1 but not the future of the congestion charge. That should be added or it should be made clear that "road pricing" includes it.

The date for ULEZ in Inner London is too far ahead and it should be introduced soon.

On road pricing, autonomous vehicles are likely to be safe and economic within ten years. If they are <u>not</u> required to be subject to road pricing, there will be gridlock, because many people will take them rather than buses or taxis. The risks would seem to indicate that it would be much more prudent to review road pricing at least for autonomous vehicles within the next five years, rather than over the period until 2041. That should be covered by a paragraph in the policy.

Para 10.3.2 add the word ', routing' after "connectivity".

New bus services will be needed in growth areas to connect to transport nodes, and existing bus services will need to be altered to meet the aim of a bus stop within 400m of every home.

Paragraph 10.3.6 is **supported strongly** by London Forum because orbital bus connections, bus services in Opportunity Areas and linking of town centres to transport nodes and social infrastructure locations will be essential for reducing car dependency.

Page:	Policy T4 Assessing and mitigating transport impacts
Section:	N/A

Policy T4 D: Line 5: "may" should be replaced by "will".

Add 'implementation of approved schemes should be phased according to transport improvements in capacity.'

Policy T4 E. Line 3: the final word "mitigate" should be replaced by 'fully addressed'.

In **paragraph 10.4.3** add, near to the end, the words 'routes and' before "stops".

Policy T4 D: Line 5: "may" should be replaced by "will". Add 'implementation of approved schemes should be phased according to transport improvements in capacity.'

Policy T4 E. Line 3: the final word "mitigate" should be replaced by 'fully addressed'.

In **paragraph 10.4.3** add, near to the end, the words 'routes and' before "stops".

Policy T5 Cycling - It needs to be acknowledged that buses have lost out under recent schemes to encourage cycling because of a reluctance to restrict private vehicular traffic by any reduction of space allocated to it. That has reduced bus priority and may have led to the lower bus patronage. Now that the New London Plan has clear advocacy for modal shift (policy GG2 E) and the reallocation of roadspace, there should be a clear commitment to buses alongside cycle lanes.

In **Policy T5 A 1)** add the following words at the end "without adverse impact on bus throughput and the safety of pedestrians."

Policy T5 B and C - Mention should be made of ensuring that the designs of cycle facilitiesare demonstrated to be attractive, preferably through surveys or some other objective measure? Filling our streets with ugly cycle racks will only provoke a backlash. The hire cycles that can be left anywhere have provoked that adverse reaction now.

In **Table 10.2** there should be greater cycle provision at hospitals. Add to the "C2 Hospitals" line in the short-stay column '1 space per 20 bed spaces'.

In **Table 10.2 for Use Class D1 Nurseries**, the requirement of one space per eight students is excessive and should be reduced to one space per 25 children. [Note that for schools the requirement in one space per 100 students]

The words for the entry on "Stations" of "A Future growth, though a step-change in pro vision is expected, especially at termini, in order to meet the Mayor's mode share target." are not well expressed.

In **Figure 10.2** it is unrealistic that minimum cycle parking standards should extend right to the boundaries of the marked boroughs, when adjacent ones do not have the standard applying in them.

At the end of **paragraph 10.5.1** add the words 'without any adverse effect on bus throughput or pedestrian safety.'

Paragraph 10.5.6 is too prescriptive as the layout of a university complex or school buildings may not need the requirement specified of close proximity of cycle parking to each building entrance. It should be deleted from the paragraph.

In **Paragraph 10.5.8** the 15 metres maximum distance of cycle parking to the entrance of a building is unreasonable and the last part of the paragraph should be removed. The decision should be left to boroughs.

Page:	Policy T6 Car parking
Section:	N/A

London Forum **welcomes** the reduced maximum parking standards in areas of high public transport accessibility levels (PTALs) and, exceptionally, minimum parking standards in areas with the lowest PTALs. We **support** the use of car-free agreements in highly accessible locations.

Policy T6 G needs to have a reference in a footnote for the location of the TfL guidance that is mentioned.

In **paragraph 10.6.1** 'and adversely affects bus journey times' should be inserted after the word "cycling".

In **Policy T6.1 D** the words "car club spaces may be considered appropriate in lieu of private parking" should be replaced by "car club spaces should be considered and planned in lieu of private parking". In the current London Plan FALP on page 239, the expansion of car clubs is to be "supported".

In **Policy T6.1 H 1)** the words should be changed to 'be for the use only of residents and visitors to residents'.

Table 10.3 should include a cross reference to Figure 4.2, as should the definition of PTAL in the **Glossary.**

Page:	Policy T6.1 Residential parking
Section:	N/A

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In **Policy T6.1 H 1)** the words should be changed to 'be for the use only of residents and visitors to residents'.

Table 10.3 should include a cross reference to Figure 4.2, as should the definition of PTAL in the **Glossary.**

Page:	Policy T6.2 Office parking
Section:	N/A

Policy T6.2: Office Parking

London Forum **supports** the revised parking standards. These parking standards will reinforce the need for new office developments to choose locations in high PTAL areas, especially near stations and in town centres.

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London Forum **supports** the revised parking standards. These parking standards will reinforce the need for new office developments to choose locations in high PTAL areas, especially near stations and in town centres.

Policy T6.4: Hotel and leisure uses

London Forum **supports** these standards as well as the requirements for charging points.

Page:	Policy T6.5 Non-residential disabled persons parking
Section:	N/A

Table 10.6: There is no clear justification for the fairly minor differences in standards here.

Page:	Policy T7 Freight and servicing
Section:	N/A

London Forum **supports** the strategy outlined in this policy, but are concerned about the lack of delivery of consolidation and distribution facilities. **There does not seem to have been significant progress in developing such facilities**, despite the London Plan having identified areas suitable for such facilities.

A more proactive strategy is needed on this.

Policy T7 A 3): The master plan should be drawn up by an independent consultant.

Policy T7 should contain something about the **London Lorry Control Scheme**

Page:	Policy T8 Aviation
Section:	N/A

The London Forum **strongly supports** this policy, especially the Mayor's stance in opposing the expansion of Heathrow (para 10.8.7)

Policy T8 C should have inserted before "impacts" the words 'social and'

Page:	Policy T9 Funding transport infrastructure through planning
Section:	N/A

Policy T9 should have an additional section 'Transport improvements should not be provided by permitting "enabling development" of a density that would be inappropriate for a site and its context.

The policy or a paragraph should make that clear.

Page:	Overview
Section:	N/A

London Forum concludes from assessing the need for income explained in this chapter that the New London Plan is not achievable in its targets for additional homes of the type that are needed.

The development of London's economy will be adversely affected also as businesses may relocate.

Modal shift from the use of cars will be later with serious implications for air pollution, bus journey delays and road congestion. The latter will adversely affect deliveries.

The figures for delivery of the full infrastructure required, including public transport show that unless the Government funds a lot of it and increase devolution of tax and related revenues and powers, the Treasury will see reduced income from a lower GDP of London.

Page:	Policy DF1 Delivery of the Plan and Planning Obligations
Section:	N/A

Policy DF1 should be titled Viability and Planning Obligations. Its policies do not cover the delivery of everything in the New London Plan.

In **Policy DF1** the word "only" should be moved to follow the word "undertaken" so that it applies to the object, not the verb.

Policy DF1 really belongs in the housing chapter which would benefit from its inclusion.

Paragraph 11.1.3 should have a footnote with a link to the London Finance Commission report.

Page:	The Funding Gap
Section:	N/A

Paragraph 11.1.11 explains that the London Infrastructure Plan 2050 outlined that the total investment in London's infrastructure (as defined in the plan) required between 2016 and 2050 could reach £1.3 trillion (2014 prices, within a range of £1 trillion to £1.7 trillion). The actual number is likely to be higher given inflation and the revised population estimates underpinning this London Plan.

New estimates should be provided.

Page:	Infrastructure
Section:	N/A

Paragraph 11.1.26 states that delivering the schemes in the Mayor's Transport Strategy will require £3.3 billion each year. It is implied (paragraph 11.1.27) that the Government will have to assist financially.

Paragraph 11.1.30 explains that most of the schemes listed in Table 10.1 for transport improvements are currently unfunded and additional sustainable funding sources and project-specific deals and grants will be needed alongside contributions from London boroughs and the private sector.

Paragraph 11.1.34 states that "London will need in the region of £11 billion to 2050 to fund new primary and secondary school places and an additional £12 billion to undertake renewals on both new and existing school facilities." Again, in paragraph 11.1.35 "This investment will need to be made by increasing Government contributions.".

Paragraph 11.1.39 explains "a requirement to spend £4.8 billion on existing health infrastructure in London just to keep it operationally functional. Further capital investment in NHS infrastructure of £2.1 billion is needed to meet the costs of transforming health services in London and accommodating population growth. Therefore, a total 5-year investment of £6.9 billion is required." And in paragraph 11.1.40 "ETTF and developer contributions represent only a relatively small proportion of the capital funding required, so additional sources need to be identified.".

Paragraph 11.1.41 states that "energy and water infrastructure will require £148 billion and £46 billion of investment in London respectively over the period. Investment in energy and water infrastructure is usually funded by providers through user charges."

The digital infrastructure required will also be costly (paragraph 11.1.44).

THEREFORE, the section on **Housing** from **paragraph 11.1.17** onwards fails <u>completely</u> to explain that the lack of funding for infrastructure would result in development not being able to be approved that otherwise would be. That makes the target of 66,000 more homes annually just an aim but a figure that is most unlikely to be achieved. There are no policies to achieve a step change from 30,000 extra homes a year delivered recently to 65,000 and the extra 1,000pa may also not be possible to deliver due to constraints. If housing is built without the transport and social infrastructure needed it will not be sustainable and would reduce quality of life for everyone living and working in the capital.

The remaining points in that section about house builders, construction resources and land indicate the significant problems that the Mayor has to overcome. Those too would limit the achievement of housing targets.

Everything depends upon the content of the section "**Potential Options for Raising the Required Funding**".

The risks of failure to deliver the transport and infrastructure London needs are overwhelming and that would (should) prevent the required homes being built.

Page:	Potential options for raising the required funding
Section:	N/A

London Forum supports the actions described

Page:	Conclusion
Section:	N/A

London Forum supports the comments in this section

Page:	Chapter 12 Monitoring
Section:	N/A

In Table 12.1 Housing "affordable homes" should be reported for the number of each type of affordable housing described in the Mayor's Affordable Housing and Viability SPG and the Mayor's Housing Strategy. The loss of social homes should be recorded also.

For Environment "Green Belt and Metropolitan Open Land" the amount lost of each should be reported.

For Transport, the change in journeys on rail, Underground, DLR and by bus should be measured and reported.

The Health measure in inadequate.

For Air Quality, the trend in the number of locations exceeding limits should be reported also.

An extra Heritage measure should be the number of buildings on the At Risk register.