



# London Forum *Insights*

**Issue 19, May 2024**

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## **Sadiq Khan re-elected with comfortable majority** **Implications for the London Plan review**

The results are in. Mayor Sadiq Khan has been returned with a 43.8% of the vote against 32.7% for his closest challenger; a convincing victory, if not quite the landslide some were predicting. The gracious acceptance of the Mayoral result in the West Midlands was not replicated in London with some social media comments suggesting that an element of islamaphobia persists.

The composition of the Greater London Assembly is almost unchanged - 11, 3 and 2 seats respectively for Labour, Greens and LibDems as before, with the Conservatives ceding one of their previous 9 seats to ReformUK. For the first time the Liberal Democrats have won a constituency seat (South West) and Labour took the last inner-London seat held by the Tories. But these successes only reduced their representation in the top up seats. The

composition suggests little prospect of the Assembly challenging the Mayor's budgetary plans in future years.

Housing will continue to be the Capital's most pressing problem, especially affordable homes for the young and for the key workers needed to keep the city running. How can these needs be met given the state of the nation's finances, and without doing irreparable damage to the city we know and love?

The current London Plan is built on an evidence base mostly compiled in the middle of the previous decade, before the Covid pandemic struck. Is a new London Plan needed or can the life of the existing one be extended via tweaks here and there? The London Forum participated in a number of the sessions held by the GLA London Plan team over the past 18 months, and we look forward to hearing their intentions now that election purdah is over.

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## Consultations, Consultations....

The Government's penchant for consultations on changes to the planning system shows little sign of abating. Here we report on the Forum's response to the three most recent.

### Permitted Development

The London Forum has responded to the consultation on additional permitted development rights, described in the last issue of Insights. Our response can be read [here](#). The Forum was particularly critical of the intention to allow large extensions to existing properties, with the risk of adverse impact on neighbouring properties and on the neighbourhood as a whole.

### Brownfield Development

The Forum's response to the Brownfield Development consultation can be seen [here](#). This was Mr Gove's flagship policy announcement in his Long Term Plan for Housing, calling for brownfield development to be prioritised, along with proposals for maximising the number of homes per site, and for lowering or setting aside space and other standards for new homes.

The Forum sees little merit in any of these proposals. Almost all development in London is on previously developed sites; there are considerable impediments to development on many of these sites, such as land aggregation and environmental remediation. Industrial sites typically lack the transport and social infrastructure needed to build viable communities. London has a large number of Opportunity Areas, many of which are hampered by such problems. Lowering space and other standards will do nothing to offset these larger concerns.

### Accelerated Planning System Consultation

A recently-closed consultation from the Levelling Up, Housing and Communities Department (DLUHC) has proposed an accelerated planning system for major commercial developments

which create more than 1000 sqm of employment floorspace. Applicants will pay a higher planning fee, in exchange for which the local planning authority (LPA) will be required to determine these applications within 10 weeks (rather than the 13-week statutory time limit), with a guarantee that part or all of the fee will be refunded if the application is not determined within this timescale. It is currently taking 6 months or more to determine many of these applications. The proposal will not apply to developments requiring an Environmental Impact Assessment, nor to those affecting important heritage assets. It will apply to mixed use developments provided the above employment floorspace criterion is met. The

The London Forum is not fundamentally opposed to this proposal, though it will initially apply to only a small number of applications (about 5 per LPA annually). However we take issue with the notion that LPAs are solely to blame for the length of time taken to process these applications today. In our experience the poor quality of many applications is a major contributory factor, leading to extensive massaging before a proposal gets to the Planning Committee. For the proposed system to work, this will have to be done in the pre-application phase and should involve the local community. Otherwise, hurried decision-making will simply lead to more bad decisions – in both directions. The Forum has responded accordingly.

The consultation also addresses planning performance and extension of time agreements, a simplified process for written representation appeals, and varying and overlapping planning permissions (Section 73/73B). The Forum has responded only very selectively to the consultation questions on these.

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## **Ealing Local Plan Regulation 19 Consultation**

### **Ealing Matters' Will Kemp shares his recent experience**

The London Borough of Ealing has just finished a Regulation 19 consultation on its Local Plan – its first in 12 years. Lavishly illustrated with glossy photos, its apparently randomly numbered policies cover only some of the topics other Local Plans contain. A 'wayfinding guide' explains that Ealing's Plan must be read in conjunction with the London Plan so that people with an interest, say, in tall buildings will have over 1,000 pages of planning jargon to penetrate.

In short, it's a difficult read, especially for most people who don't know how planning works or the role Local Plans play. To help our members Ealing Matters ran briefing sessions at both Regulation 18 and 19 stages to identify areas we knew most concerned them. These stimulated discussions about what the Plan's policies meant and how best to comment. From these we drew out the key aspects of concern and circulated them more widely to Facebook groups around the Borough, encouraging their members to comment. Our website contains responses to the Plans that groups have shared at both the Regulation 18 and 19 stages. They cover

multiple topics including housing targets, protection of Metropolitan Open Land (MOL), infrastructure, tall buildings, town centres, housing standards, conservation, climate change site appraisals and Plan monitoring.

Their impact is another matter. The NPPF and the London Plan talk about local people shaping their surroundings, yet community groups in Ealing are being pushed ever further to the margins. To the consternation of many who set up home here, the Council has adopted a vigorous 'pro-growth and open to new business culture' that nobody knew they had signed up to. The Council boasts it is now 'number one in London' having granted more major planning applications than any other Borough. GLA planners expect Ealing's population to grow by 80,000 in the next 15 years – more than the current population of Guildford!

Ealing ("Queen of the Suburbs") originated as a borough of low-rise family housing; a dormitory for commuters using its rail links to travel to work in London. The borough has relatively little brownfield land, so many of these major schemes obtrude into established residential suburbs. People fear the impacts of these developments on their quality of life. Ealing's renowned greenness feels at risk, especially its MOL. Conservation areas are threatened and, with no conservation officer, nobody in the Council supports its heritage. Power, water and waste water utilities are already over capacity and the harmful climate effects of widespread redevelopment of buildings less than 40 years old is ignored.

More alarming still is that Ealing's planners show no sign of pursuing its new Plan. Two weeks after the Regulation 19 consultation ended the Council granted consent for two developments featuring towers higher than the 'maximum' specified in the Plan, which quotes from the NPPF: 'All planning applications must be determined in accordance with the statutory development plan for an area unless material considerations indicate otherwise.' Not in Ealing it seems.

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## Where to next with London Forum Insights

**Editor, Paul Thornton, dissects the recent member survey**

Despite my exhortations, the *Insights* survey elicited responses from only 17 of our 120 member societies. Thank you to those who did respond. You constitute a good cross-section of our membership as regards inner/outer London, north/south of the Thames and larger/smaller societies. We should beware of attaching too much weight to the results from such a small sample. However, a number of significant points emerge:

1. The newsletter is seen by a total of about 100 individuals in the 17 societies, an average of about 6 readers per society
2. All but a handful of respondents read at least some of the articles in depth

3. *Insights* is a primary source of information across a range of topics for about half our respondents, and a primary source on planning matters for nearly all. All but one see *Insights* as relevant to their organisation
4. Almost all tell us that the length and depth of the articles is about right, though shorter articles with links to more in depth information would also be acceptable. Fewer than one third are looking for a lighter, wittier, more visually attractive publication. More articles contributed by members would be welcome.
5. The frequency (5 per year) is seen as about right. There is no appetite for switching to a 2-column format. A contents list would aid navigation – see this issue!
6. Helpful comments included encouragement for more focus on “amenity societies”, on outer London matters, and on enabling societies to cooperate with one another.
7. Finally, a gentle warning to stick to topics within our area of expertise and not to stray beyond our “high ground”.

Our recently formed Member Services Committee will be taking these points on board, and we welcome comments on the shape and content of the newsletter at any time.

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## **Andrew Bosi's Transport Round-up**

### **What the Mayoral and GLA elections mean for transport policy**

The re-election of Sadiq Khan means that the ULEZ is safe. Its impact was exaggerated in Labour's botched by-election campaign in Uxbridge last year. Many people already had compliant vehicles and others took advantage of the scrappage scheme. Those living outside London but driving in may have been adversely affected, but they had no vote. Its long term replacement, a system of road pricing, is, though, further away as the Mayor backed off from the pledge he had made in a book more than a year ago, possibly under pressure from his Party leader.

There is little prospect of money for big ticket items Bakerloo Line Extension and Crossrail2, so the 80% of journeys by sustainable means by 2041 looks over-optimistic. However, the Mayor did pledge more express bus routes, including one dubbed "Bakerloop" to cover the route of the planned extension of that line.

Beyond London, Labour has pledged to introduce Great British Railways and the Government draft bill is being scrutinised in the Transport Select Committee, so there may be a degree of consensus masked by arguments about the fine print. It is six years since the Williams report was commissioned and three since it was published as the Williams-Shapps plan.

A court case against a cyclist allegedly responsible for the death of an elderly pedestrian has been dismissed on the grounds that speed limits imposed on vehicles do not apply to bicycles.

## Briefly Noted

### Hope against Hope?

In our last issue, we drew attention to the clause in the Levelling Up and Regeneration Act that, in certain circumstances, permits public authorities using Compulsory Purchase Orders to acquire building land to do so without paying the inflated “Hope Value”. The Government has now confirmed that this provision has come into force – see [here](#). This only applies to development of affordable and social housing, and facilities for health and education use. Those of us old enough to remember the 1950s council housing boom will surely be asking whether this could be a game-changer, allowing local authorities to build at scale once again; or will it only be used when, say, a single landlord is holding an otherwise strongly supported scheme to ransom? In any event, the following caveats should be borne in mind:

1. In each case, an application must be made to the Secretary of State for the hope value to be set aside
2. Cash strapped local authorities may be in no position to take advantage of this provision, no matter how cheap the land
3. Application of this provision may be open to challenges in the courts, including under Human Rights and Equalities legislation.

Let us hope that there are some test cases in the pipeline, so that we that we can quickly establish whether this is “owt or nowt”.

### Biodiversity net gain extended

From 2nd April the requirement to demonstrate biodiversity net gain is extended to small developments (typically 9 homes or fewer, on less than 1 hectare of land), not just larger ones.

### LURA Enforcement changes come into force

Numerous changes to the Enforcement regime signalled in the Levelling-up and Regeneration Act came into force on 25 April 2024. The key ones for local authorities are: Section 115 amends section 171B(1) and (2) of the 1990 Act to extend the time period in which local planning authorities can take enforcement action against unauthorised development in England from 4 to 10 years. Section 116 amends section 171E of the 1990 Act to allow local planning authorities in England to issue a temporary stop notice that has effect for up to 56 days, [increased from 28 days] providing more time for a local authority to investigate a suspected breach of planning control. See [here](#) for more detail.

### Second staircase technical guidance published

The government has published long-awaited technical guidance on its second staircase rule. The Mayor of London said work on 38,000 homes has been halted due to uncertainty caused by the lack of technical guidance. Research commissioned by the government found that when there is a second staircase in a high rise block, the evacuation time is halved. Published on

Good Friday, changes to Approved Document B – the government’s building guidance covering fire safety – make clear that a second staircase is required in tall blocks of flats over 18 metres in height. It also introduced a transition period for the rules up to 30 September 2026. Full details can be found [here](#).

### **What next for the Holocaust Memorial and Learning Centre?**

The Holocaust Memorial Bill was introduced by the Government in February 2023 to overrule the London County Council (Improvements) Act 1900 and permit the construction of a Holocaust Memorial in Victoria Tower Gardens. Because it is what is known as a Hybrid Bill its progress has been slow and complex; it has just emerged from a Select Committee of the House of Commons, which heard petitions against it; the Committee has not amended it, but has been critical of the Government, especially concerning the lack of transparency about site selection, and the mounting cost of the scheme even before security matters are factored in. It is not yet clear how the Government will respond, or what the next steps will be; the King’s Speech last November reiterated the Government’s commitment to the project.

### **Heritage Alliance appoints new Chair**

The Heritage Alliance has appointed Carole Souter CBE as their new Chair. The Alliance brings together over 200 independent bodies, including the London Forum, all with a shared interest in ensuring that England’s historic environment and wider cultural heritage are valued and supported. Carole has over 35 years of experience in the public sector, having previously served as CEO of the Heritage Lottery Fund (now the National Lottery Heritage Fund) and Interim Chair of Historic Royal Palaces. She currently serves as Chair of the Sulgrave Manor Trust, a Trustee of the Horniman Museum and Gardens, a Trustee of the Oxford Preservation Trust.

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## **Open Meeting on Thames Policy**

### **Thames-Side Policy - Is it Sound?**

**22nd May 2024, 6.30 – 8.00 pm, on Zoom**

There has been much concern about development along London’s riverside that does not accord with planning policies, coupled with growing unease about issues such as flood-risk, water quality and the management of London’s bridges. The time has come to address these concerns as consideration is given to a future review of the London Plan.

The London Plan encourages riparian boroughs to define their boundaries of the Thames Policy Area and work together to update their respective strategies, and this is happening, in part at least.

Confirmed speakers are:

Mathieu Proctor of the GLA on Thames Policy Areas in the London Plan 2021.

Rebecca Kendrick of the Thames Landscape Strategy, which covers Hampton-Kew, on issues along that part of the river.

Philip Whyte, Co-Chair of the West London River Group and Chair of the Wandsworth Society on the Thames Strategy for the Kew-Chelsea stretch

Tim Catchpole, Chair of the Mortlake with East Sheen Society, on the contentious Mortlake Brewery redevelopment (aka Stag Brewery) which is the subject of a public inquiry starting at the end of May.

This event is not just aimed at Forum member societies that border the river. The Thames is hugely important to the whole of London, and we hope that representatives of many non-riparian societies will also join the meeting and make their views known.

[Click here to register and receive your Zoom link](#)

## Other dates for your diary

**8th July 2024 – Open Meeting** in the Gallery, 70 Cowcross Street, 6.00 for 6.30 pm  
Topic to be advised

**20th August 2024 – Rooftop Reception** at 70 Cowcross Street, 6.00 pm onwards  
Good weather (almost) guaranteed!

**17th October 2024 – Annual General Meeting** in the Gallery, 70 Cowcross Street  
Further details to be advised

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## Local Historical Plaque Schemes

### Civic Voice and Historic England announce a new collaboration

Civic Voice and Historic England have announced a survey aimed at understanding more about the diverse array of local plaque schemes across England and the dedicated organisations behind them. This collaboration and survey come as Historic England prepares to roll out a new government-backed national blue plaque scheme, on behalf of the Department for Digital, Media, Culture, and Sport, scheduled for launch in late May 2024. Historic England seeks to further engage with civic organisations, and the survey will also seek permission to explore further collaboration opportunities.



The survey will delve into various aspects of local plaque schemes, including their establishment, management, and impact on communities. Insights gathered will inform efforts to enhance the effectiveness and these initiatives, through a new 'how-to' guide to running a plaque scheme. The survey will take approximately 5 to 10 minutes to complete the mandatory questions. To participate, please fill out the survey [here](#).

"We encourage organisations to collaborate on their responses and share as much information as possible. However, individual responses are also welcomed, so please do share your knowledge of local plaque schemes as we build up a national picture." said Martin Hamilton, Chair of Civic Voice. **Please note that the survey closes on 12th May 2024.** You do not need to be a Civic Voice member to take part.

Some members will be aware from the recent Civic Update (3rd May) that Civic Voice has been invited to a meeting with Government officials to discuss the establishment of a **national Business Improvement District (BID) Forum** to look at the work of business improvement districts. This could be the start of an important collaboration, and we encourage members with BIDs in their neighbourhood to respond to the invitation from Civic Voice Chair, Martin Hamilton, to share any relevant experiences.

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## *Points of View*

**Views expressed are not necessarily those of The London Forum**

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With the Mayoral election out of the way, the London Forum is inviting various organisations to say what changes they would like to see in the Capital. In the first such article, **Michael Ball, Just Space Co-ordinator** and longstanding activist for Waterloo Community Development Group celebrates the launch of the **JUST SPACE MANIFESTO 2024**.

London is booming. London is bursting. London is breaking. Things are not OK. We're not building the things Londoners need. London's development is driven by financial interests and hot money. London is a carbon factory. 2024 sees elections for the London Mayor, the London Assembly and national government. But much of what is promised is more of the same. This should be our chance for change.

Just Space has produced a Manifesto which should be a key tool in spreading grassroots knowledge – learnt the hard way – about how to plan for a better, fairer, caring city. The manifesto was prepared by many Just Space groups in working parties since our 'Gathering' in November last year and a full-day conference in March. It builds upon work done over previous years, in particular the Just Space Recovery Plan 2022.

The Manifesto is a mix of the numerous changes to planning policy and practice required at the neighbourhood, local and strategic levels, along with some necessary macro changes to government, delegation, taxation, and law, including

- Changing the focus from GDP to the pursuit of human well-being such as health, biodiversity, care and community
- Reforming Council Tax, Inheritance Tax, Capital Gains Tax, and introducing Land Value Tax
- A major programme of public investment in public housebuilding
- Tenancy reform, abolition of the Right to Buy, and a presumption against estate demolition schemes, and a presumption in favour of retention and retrofitting in all development

There are chapters on housing, economy, biodiversity and climate change, social infrastructure, tall buildings and density, and the intersection of all these with fairness and justice.

It is also a rebuke to some of the simplistic thinking which has persisted in various political forums:

*“The government and government-in waiting appear to believe that build, build, build will solve the housing crisis by bringing prices down and that planning restrictions are in the way of this goal. This is a misunderstanding. The imperative to build has always driven the London Plan, while the law of supply and demand does not apply to land, which is finite. Furthermore, a small number of house builders control the land supply, taking options on land and keeping prices high by not building out the existing permissions they have for up to 300,000 homes. When the stock of housing in the market grows, the rich will still have the most market power and investors will continue to use London as a financial safe haven, seeking high returns from renting or leaving homes unoccupied.*

*“This, and the effects of building a more dense and even less equitable city, has not been considered. The affordability of housing crisis requires solutions that are more nuanced and more radical. Strategic planning is needed to control the bad things and ensure the quality of life of all Londoners.”*

Download a copy or read online [here](#) - the best 12 pages you'll read this year! And there's more to do, including on transport... perhaps you can help write it.

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## Round The Societies

**Michael Hammerson and Helen Warner pick out some key items**

A fuller version can be found [here](#).

The **Brixton Society** report that they can make a difference at times; their objection led to a 24-hour gaming arcade operation on Brixton Road being successfully stopped. However, with the pressure on Councils to build housing, high-rise blocks applications continue, such as on the Tesco site in Acre Lane adjacent to a conservation area. This is echoed by the **Streatham Society**. They are glad to have at last persuaded Lambeth to involve them on key planning applications, but even with the need for “local distinctiveness” to be protected emphasised in their Local Plan, high-rise developments are being supported by planning officers. The number of planners has fallen by 20% nationally in fifteen years and turnover is high, leading to overwork and pressures particularly affecting enforcement. The feedback we frequently hear is a lack of trust and engagement. From **Peckham Vision (PV)** we hear of fourteen new buildings of up to 20 storeys proposed which will have a transformative impact on their area, but community awareness remains low. PV have a new petition which aims to open up the issue across Peckham.

The **Highgate Society** visited eleven sites of major concern on their walkabout with Haringey Planners and discussed where Haringey’s planners are “letting the community down through failure to follow their own policies”. Key issues are failures to secure adequate fire safety provisions, contrary decisions by their Quality Review Panel and lack of enforcement.

The **Enfield Society** are lobbying councillors and working on information for the public to try to dissuade the Council from de-designating 13% of Green Belt land to make way for possibly 10,000 homes. The draft Local Plan is in the final Regulation 19 consultation stage.

But, on a more positive note, the **Hammersmith Society** met with FORE partnership, the developers of the former L’Oreal Building and find they seem to be taking their green credentials more seriously than most. Plans for the major Royal Masonic hospital development are now public, with 385 documents, but rescuing and repurposing the Grade II\* buildings is welcome, and the developer has engaged widely and openly with community groups.

The **Waterloo Community Development Group** report on a “monstrous” office block proposed for Queen’s Walk. Secretary of State Michael Gove’s granting approval in February led to “widespread horror”. Campaigners believe there are legal flaws in Gove’s decision: it contradicts his statements and policy on beauty, on the need for prioritising housing on brownfield sites, and on reducing carbon through unnecessary demolition. Save our Southbank, who have led the ‘Stop the Slab’ campaign, are seeking a Judicial Review, and are crowdfunding for action in the High Court.

The **Pinner Society** ask – Do our ‘village’ shops have a future? Reportedly, three out of five of Gen Z (born between 1996 and 2010) say they would rather shop online. However, you can’t have a cup of coffee or a haircut online. High rents, lease length, (getting shorter) and business

taxes all contribute to shops failing. The **St Marylebone Society** like many, have dockless bikes and e-scooters blocking pavements. Westminster City Council are trying – with an online reporting site - to control and fines for bad parking.

The **Highbury Community Association** and **Islington Society** give prominence to “the constant attack on bus users”. They want to see bus lanes re-instated, close liaison between TfL and local councils and a review of cycle lanes which impact on pavement safety. They contend that it is a false assumption that cyclists want to use main roads when many much prefer quieter, less polluted backstreet routes – which may explain why cycle lanes on many main roads often look empty.

The **Westcombe** and **Greenwich Societies** report that despite substantial opposition from residents two new LTNs, each side of Greenwich Park, may go ahead but the decision has been ‘called in’ by four Councillors! The **Kew Society** alert us to The Office for National Statistics online site called ‘Build a Custom Area profile’ based on the 2021 Census. It enables users to investigate some basic characteristics of their area. See [here](#).

Conservation efforts to breed Bali starlings (one of the world’s rarest birds – only 6 were left in the wild in Bali in 2001) have been successful at **Battersea Park** Children’s Zoo!

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[LondonForum.org.uk](http://LondonForum.org.uk)

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