

# Greater London Authority

## The London Plan: Consultation

**ACE response**

**March 2018**

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## Recommendations

Below is a summary of all recommendations included in ACE's response to the draft London Plan (the plan).

### Planning London's Future (Good Growth Policies)

ACE recommends the Mayor should ensure excellent design is integral to the growth of the city in the future and is at the core of all policies in the plan.

### Spatial Development Patterns

ACE recommends the Mayor:

- establish a formal leaders' forum on development across the wider South East; and
- work with local communities to develop a framework on what collaboration with local communities should look like and to incorporate this framework in planning approaches for local plans and opportunity areas where possible.

### Design

ACE recommends the Mayor should:

- afford London boroughs the ability to designate their own design standards relating to the 'look and feel' of their area;
- be in favour of retrofitting buildings before considering new developments on existing sites;
- encourage the involvement of the community in the design stages of developments;
- ensure inclusive design also accommodates those with language or cultural barriers;
- ensure accessible housing is designed to the highest standard and allows users to access these homes with dignity;
- investigate if the design of CIL arrangements for London boroughs and GLA is having an impact on revenue collected for infrastructure;
- take a long-term approach to the public realm and set more prescriptive targets in relation to desired outcomes; and
- place a requirement on London boroughs to create supplementary planning guidance in relation to tall buildings.

## Housing

ACE recommends the Mayor should:

- expand the remit of the proposed Infrastructure Coordination Unit to include housing;
- explore ways to step in to ensure London boroughs meet housing targets on small sites;
- consider all meanwhile use options for vacant sites, specifically whether these could be used as staging areas for nearby construction sites or whether they could be used to facilitate community activities;
- toughen targets on affordable housing provision as a short-term measure, noting current targets will only lessen the scale of the problem;
- outline that any cash in lieu payments for affordable housing provision should attract an interest rate applied on top that is proportional to the size of the development;
- alter the affordable housing threshold approach to apply to sites capable of delivering three or more units;
- further explore options to support Londoners in moving into appropriately sized homes;
- consider encouraging London boroughs to charge planning fees based on the proportion of affordable homes planned;
- consider whether replacing housing, where it is part of an estate regeneration scheme, on a 'like for like' basis is the most appropriate strategy; and
- set clear targets on the overall housing size mix that London needs, and work closely with London boroughs to establish what is best housing size mix in specific areas.

## Social Infrastructure

ACE recommends the Mayor necessitate the replacement of social infrastructure assets at a 1:1 ratio to ensure there is no net loss in terms of social infrastructure provision.

## Green Infrastructure and Natural Environment

ACE recommends the Mayor:

- encourage all planning applications to incorporate some form of greening in the form of tree planting, be that directly associated with the development or associated by some form of green infrastructure; and
- encourage all London boroughs to have targets for the percentage of green and open space created as a proportion of all new developments.

## Sustainable Infrastructure

ACE recommends the Mayor:

- provide further information on how carbon offset funds are spent and how this should be reported; and
- should make provisions to encourage London boroughs and developers to engage at an early stage with relevant energy companies and bodies to establish the future energy requirements and infrastructure arising from large-scale development proposals.

## Transport

ACE recommends the Mayor:

- better incorporate the digital revolution at the heart of transport policies in the plan;
- provide further information on how different areas across London are currently contributing to the public and active transport target and the change expected by 2041;
- comment on private hire vehicles and ride share platforms;
- identify which proposed transport schemes included in the plan will likely require funding support from the UK Government (i.e. Crossrail 2);
- include the enlargement of Old Oak Common between HS2 and the Elizabeth line in the indicative list of transport schemes in the plan and engage with the HS2 team on this proposal;
- provide a view on if planned transport schemes in the plan will meet the additional demand on the network by 2041 (five million additional trips per day);
- provide further clarity on the circumstances a transport assessment for a development will be approved when planned transport connections are some way off completion;
- discuss how London's cycle network will also influence development decisions;
- discuss reducing the number of off-street parking and reusing this land for housing and greenspace, while also concurrently discussing how to increase the number of car parks with vehicle charging technology; and
- have a more balanced approach to its position on Heathrow Airport expansion, with a more realistic expectation the airport (in addition to other airports in the South East) is a world leader at reducing noise and air quality harm.

## **Funding and Monitoring the London Plan**

ACE recommends the London Plan should have:

- a percentage target for delivery of affordable housing to reflect the Mayor's policy and election campaign commitment on this topic; and
- a performance indicator and measure on the quality of transport services in addition to the 80% active and public transport target by 2041.

## Planning London's Future (Good Growth Policies)

The key for good growth across London will be quality design from the outset. Design is integral to all policies and is at the core of the plan itself. Quality design will ensure that the houses London needs get built and that its streets and communities benefit from positive social outcomes. As the city struggles to expand outwards, making the best use of existing space will be crucial if London is to continue to fairly cater for a growing economy and population.

What all policies in the plan should aim to do is take a long-term approach that places the emphasis on excellent design to enact a series of positive changes to achieve long term goals. Change will not happen overnight; the city's air will not become cleaner immediately nor will its communities suddenly become more inclusive.

## Spatial Development Patterns

### **Policy SD1: Opportunity Areas**

ACE supports the Mayor's approach to opportunity areas in the plan. Opportunity areas are significant locations that can truly shape London's growth and help meet the many demands facing the city, by providing new housing and significant transport connections.

ACE notes the ongoing success of opportunity areas will depend on a collaborative relationship between the Mayor and London boroughs. We believe the plan makes a positive start by clearly outlining how the Mayor intends to work with London boroughs to maximise the potential of opportunities areas and what the Mayor expects from London boroughs in return.

### **Policy SD2: Collaboration in the wider South East**

The plan rightly notes London does not exist in isolation, and the city is instead a central part of a network across the wider South East. Decisions made in London have a significant impact on surrounding areas, particularly where travel across the region is concerned, and these areas must be considered and included in the decision-making process on London's future. 'Greater London' in our view extends well beyond the GLA boundary and the Mayor should use the plan as a strategy for engaging with other regions in the wider South East to improve how London's economic area operates. For example, the plan should consider how developments can maximise the use of 'two-way' transport corridors throughout the wider South East.

ACE therefore supports the Mayor's commitment to consult with partners in the wider South East for development plans and other shared strategic concerns, and also recommends the Mayor establishes a leaders' forum to consider development across the wider South East.

### **Policy SD10: Strategic and local regeneration**

ACE supports the Mayor's approach to strategic and local regeneration in plan. The area in this policy that we particularly support is promoting regeneration issues to be undertaken in collaboration with local communities to develop a shared vision for the area. We strongly believe a collaborative approach with the community will result in an end-product that will be supported and better placed to serve local needs. The recent development at King's Cross is a prime example of what can be achieved through good collaboration.

ACE recommends the Mayor works with local communities to develop a framework on what collaboration with local communities should look like and to incorporate this framework in planning approaches for local plans and opportunity areas where possible. ACE is willing to assist the Mayor with the development of this suggested framework.

## Design

### **Policy D1: London's form and characteristics**

ACE welcomes the proposals established in this policy, and strongly agrees with the sentiment that quality design and good planning are intrinsically linked. Heading into the future it will be crucial that design policies in the plan should aim to optimise density, connectivity and land use.

Additionally, the Mayor must consider how London's current typology and existing buildings will fit into future designs. Currently, London is comprised of a range of different building typologies reflecting its long and diverse history. To avoid diminishing London's character, ACE suggests a presumption in favour of retrofitting buildings, before considering new development on these sites. Many areas in London that contribute to its character do not contain listed buildings, but the Mayor should aim for these to be retrofitted and expanded first and demolished to make way for new development only as the last resort. This recommendation aligns itself to the broader aim of moving London towards a more circular economy that seeks to minimise waste and keep assets and materials at their highest value for as long as possible.

The Mayor should also afford London boroughs the ability to designate their own design standards relating to the 'look and feel' of their local area. This will allow London boroughs to preserve and enhance their local character, whilst also granting greater autonomy over the future look and feel of the borough.

### **Policy D2: Delivering good design**

The proposals on delivering good design will go some way to ensuring plans for London's development adequately address issues around capacity, growth and sustainability. However, more emphasis should be placed on those who will be utilising the facilities day-to-day once they are completed. It will be the input of the community that will be invaluable to the success of a project. The Mayor must do more to consider how members of the community living in

these areas can feature in the design process; when communities feel they have been directly consulted in changes happening to their area, it makes it easier for them to feel pride and to take ownership of their area and spaces, which in turn brings a range of other social benefits aiding the creation of strong and inclusive communities.

Closely related to this is ensuring minimal changes are approved to the initial design of a project following planning consent, and any changes made are explained and communicated clearly to members of the public. This is crucial for the community, as involving them in the design consultation will only be worthwhile if they feel that their input is contributing to the outcome; the disconnect between planning and delivery can be frustrating for the public and can lead to schemes not delivering on expectations.

Delivering on good design does not necessarily mean reinventing the wheel; there are many examples across London where well considered design has resulted in buildings that still house people today. Victorian mansion blocks are a prime example of how good design has produced desirable housing that continues to serve the housing needs of Londoners today. Mid-rise developments in London can provide a good solution to London's housing issue whilst avoiding unwelcome local high-rise developments and can help positively contribute to the character of a local area.

### **Policy D3: Inclusive design**

ACE is supportive of the Mayor's policies to ensure London is an inclusive city for all. This means making it a pleasant place for its citizens to live, but it also means making it a welcoming destination for those who do not reside in the city. Excellence at the design stage can help to make the city more accommodating for foreign visitors who may have to overcome language or cultural barriers whilst in London. Similarly, people from other parts of the United Kingdom, who are not familiar with the city, can benefit from inclusive design to help their navigation of the public realm. Design of public space that is easy to navigate and helps to channel users towards their destination can help improve accessibility, as well as potentially reducing congestion around London's busiest areas.

### **Policy D5: Accessible housing**

In order for London to be seen as an inclusive city, it will be vital that its homes are accessible to all. Sub-par amenities, can often discourage users if their overall experience of them is unpleasant, undignified or impractical. It is vital that access for disabled, elderly and children

is truly accommodating through high standard facilities that will consistently deliver excellent levels of accessibility. This must follow from considerations at the design stage.

### **Policy D6: Optimising housing density**

ACE is broadly supportive of this policy, however highlights optimising housing density is not just a housing issue, but also an issue of supporting infrastructure. It is crucial that design is at the forefront of these considerations and maximises its role in helping ensure infrastructure projects are delivered on time. Any delay to infrastructure projects, where housing has been completed, can create disruption as well as frustration for residents of these areas. Poor design risks creating areas of high population density that lacks the necessary supporting infrastructure. The borough of Hackney is a prime example being poorly served by the underground and relying heavily on the bus network, and there are many opportunities for housing in the area that could be unlocked through better transport links (i.e. Crossrail 2).

ACE also has concerns over the impact multiple amounts of small sites may have on the local borough's ability to fund infrastructure. Currently, minor developments do not usually have to undertake infrastructure assessments because they are considered to have a minimal impact on infrastructure capacity. Whilst this may be true in isolation, however when considered with the Mayor's presumption in favour of small sites, the cumulative impact of smaller sites on London's infrastructure capacity could become significant. This should be a consideration for London boroughs, as the effect of multiple small developments will be equivalent to one larger development consisting of the same number of houses. In several years' time, if no action is taken, London risks lacking the necessary infrastructure required for further growth.

A further point for consideration would be the impact optimising housing density would have on CIL revenue for London boroughs and GLA, as we understand some do not currently charge a CIL charge for small sites and offer relief for affordable housing. ACE recommends the Mayor consider if this is having a significant impact on total CIL revenue collected for infrastructure.

### **Policy D7: Public realm**

ACE agrees with the policies outlined in this section, however we suggest making the policy on public realm more prescriptive. Currently the wording of the policy states that plans and developments "should", when it should read "must". This is a critical consideration where safety is concerned and toughening the language here will help to deliver plans for London that will significantly improve the experience people have in the public realm.

The Mayor should also take a long-term approach to the public realm and focus on ensuring that it is conducive to the aim of building and sustaining inclusive and diverse communities into the future. Currently the policy sets no timescale as to improvements suggested within the subsection; for example, increase the availability of free drinking water in London boroughs to 65% within three years. This will help to ensure that these proposals produce tangible results.

Noting the significance of the public realm to communities across London, the long-term impact of decisions relating to the public realm emphasises the need for the Mayor to get these decisions right from the outset. The public realm is at the centre of life in the city and it serves as an anchor around how diverse and inclusive communities develop. Therefore, the public realm must be built to last, and sustain activity well into the future to help achieve the objectives set out in the first chapter of the plan, and key to this will be quality design.

### **Policy D8: Tall buildings**

ACE acknowledges the role tall buildings can have in helping to provide a solution to housing supply issues, as well as generating new jobs during and after their construction. However, tall buildings are not necessarily the only solution; quite often medium rise buildings could accommodate growth just as well as tall buildings and spread additional infrastructure demands more evenly across London.

With regard to tall buildings in central London, due care must be given to how new developments will impact upon the city's global image. London's current typology incorporates a range of different styles, and this is what gives London much of its character. The city's largest structures and any new development should seek to diversify London's skyline.

ACE encourages London boroughs to develop their own supplementary planning guidance that looks at developing a plan considering the local skyline, as well their approach to small buildings. The Mayor should produce some guidelines to help London boroughs in this, noting there can be no blanket plan to cover the whole city.

### **Policy D12: Agent of change**

ACE is supportive of the agent of change principle as it encourages community development whilst also preserving the character and purpose of an area. Additionally, where new developments are planned, mitigating noise in these areas through effective planning is a responsible step that allows people to enjoy these venues without having to travel far, as well as being beneficial for the local economy.

## Housing

### **Policy H1: Increasing housing supply**

One of the key limitations on housing supply in London is the availability of land. Making better use of the land London will be even more important as the city continues to grow. The targets established in table 4.1 on the plan will help establish a basis for the rest of the policy to work in and give London boroughs direction. However, to ensure housing targets set for the London boroughs are not arbitrary numbers, creating an incentive scheme for meeting targets would be beneficial, and would help embed the mindsight that not hitting these targets makes London boroughs complicit to the housing crisis.

ACE supports the plan's increased emphasis on higher density developments. Increased co-location of sites is one way this can be achieved, and this combines well with the development of other infrastructure projects. Over station developments are an example of how higher density developments can be achieved through and in conjunction with other transport infrastructure projects, simultaneously achieving both housing and transport infrastructure objectives.

ACE notes the Mayor could do more to synchronise efforts between London boroughs with regard to housing. The Mayor's proposed PMO-style Infrastructure Coordination Unit is a good means to achieve this, however, ACE recommends the unit needs to have its remit expanded to include housing. This will make the unit far more comprehensive and effective as housing and the supporting infrastructure are closely linked.

### **Policy H2: Small sites**

Due to the nature of land availability in London, particularly in inner London, small sites will play a vital role in achieving housing targets. Considering 40% of London's housing targets will be fulfilled by houses built on smaller sites, it will be vital that where London boroughs are failing to meet their targets around smaller sites, the Mayor can step in to make sure the necessary houses are built. One way the Mayor may be able to do this is through aggregating some of the smaller sites together into packages for development. Not only would this provide certainty for developers but could also be used to streamline some of the planning costs, which are so often a massive restriction for smaller builders in particular. This may also have the added benefit of reducing building costs and encourage an approach to construction that rewards offsite manufacture.

### **Policy H3: Monitoring housing targets**

Monitoring housing targets will be an integral part of ensuring that these targets are met. Where there is a risk that boroughs may fail to reach their housing targets, identifying this risk early and being able to take the appropriate action to mitigate it will ensure that all London boroughs play their part in tackling housing problems.

ACE believes the plan should provide further clarity over what constitutes net housing delivery in relation to targets. For example, if the development of 25 new homes is only possible with the demolition of ten existing homes, confusion may arise from whether this new development has contributed 15 or 25 new homes to London's housing target. This clarity is missing from the policy currently.

### **Policy H4: Meanwhile use**

ACE believes meanwhile use in London can be an efficient use of land by providing other social or construction benefits. Where there is vacant land next to a development, this area could be used as a staging post for construction equipment or as storage for materials. This would lessen the impact of moving building equipment on the local transport network and may have the added benefit of speeding up construction times.

The proximity of vacant sites nearby to a new development should be considered at the planning stage, and perhaps local vacant areas could even be shared by multiple developers in an area, creating construction hubs that aim to minimise disruption. These could be on a smaller, more localised scale than what was implemented prior to the 2012 Olympics where logistics hubs were established outside of London.

Alternatively, meanwhile use areas could double as areas for social and communal activities, such as winter markets or open-air cinemas in the summer time. This should be linked into the Mayor's objective of creating inclusive and vibrant communities.

### **Policy H5: Delivering affordable housing**

Currently, the Mayor's targets for delivering affordable housing are not ambitious enough. There is an identified need in London for 43,500 of the 66,000 to be affordable homes, which equates to 66% of London's overall need. Current targets are set at a minimum of 35%. If the Mayor and London boroughs are able to achieve success in reaching its targets, it will only

reduce the shortage of housing in London. A tougher target should aim to eradicate the current affordable housing need rather than maintaining or reducing the current gap. The target should therefore be closer to 66% in the short term, in line with London's needs.

ACE believes the Mayor's efforts to deliver more genuinely affordable housing in London cannot sacrifice the need for these homes to be of high quality and conducive to the life of London's communities. Affordable housing needs to be seen as an investment, and spending more upfront to build sustainable, well designed and inclusive homes will reduce costs over the life of a house, positively contribute to environmental objectives and provide a social value to residents and the community. The Mayor must avoid overseeing the development of cheap, poor quality and sub-standard housing for Londoners, as this provides an inadequate solution to the housing supply shortage, particularly with land available for development in equally short supply.

ACE agrees with the principle that cash in lieu payments should only be accepted as a last resort and not detrimental to the provision of affordable housing overall. Whilst cash in lieu payments may result in affordable housing in other areas, it presents an easier way for developers to avoid building the necessary housing stock that London needs. To further discourage this, any cash in lieu payments should attract an interest rate applied on top that is proportional to the size of the development. This would provide a significant disincentive for developers to pursue cash in lieu alternatives and would raise additional funding that could be used for further affordable housing gains.

ACE believes the plan must not lose sight of the basic notion on why housing is important to people and communities. Having somewhere appropriate to live that is safe and secure is a key element of the 'hierarchy of needs', and we limit a person's quality of life and ability to contribute to society if we are unable to provide appropriate housing. Inaction on London's housing need risks the gentrification of areas and pushes more and more people out of the city because they simply cannot afford to live there. This then has severe impacts on the constitution of London's communities, workforce and has larger consequences for London as a centre of economic activity.

## **Policy H6: Threshold approach to applications**

ACE is broadly supportive of the Mayor's threshold approach to applications and believes the Viability Tested Route provides a good check on developers to ensure the necessary amount of affordable housing gets built. However, noting both the Mayor's presumption in favour of

small sites, as well as the threshold approach only applying to developments of greater than ten units, this leaves a large proportion of small sites that do not require the threshold approach to be applied to them. This is particularly concerning when considering a large amount of small sites in London would not exceed ten units. ACE recommends altering the threshold approach to apply to sites capable of delivering three or more units to capture a greater number of housing sites in London. This would mean the Mayor's minimum target of providing 35% affordable homes on a site would still be satisfied, with one in three of these homes being affordable. This proposal should not interfere with following the Viability Tested Route, and there must be a strong business case for not providing this ratio of affordable housing.

ACE notes that ensuring planning departments across London are adequately funded will be crucial for the success of the ambitious housing target. In an effort to encourage the construction of more affordable homes, the Mayor should investigate ways to enable the creation of affordable homes through benefits or penalties that can be derived from the planning approval process.

### **Policy H10: Redevelopment of existing housing**

ACE strongly agrees that any regeneration should not result in the loss of affordable housing or any deterioration in condition of the housing stock. In the case of estate regeneration, these schemes should aim to increase levels of affordable housing beyond what they were prior to regeneration, noting London has historically not built sufficient numbers of affordable homes.

ACE also suggests considering whether replacing on a 'like for like' basis is the most appropriate strategy, as it may be more beneficial to assess the needs of a particular estate in greater detail before replacing what was there originally. In some cases, demand for rental homes may outstrip private ownership. In these areas it would be irresponsible to replace private homes if there was a greater demand for alternate types of housing. The policy should ensure that it does not restrict itself into providing inappropriate housing solutions in relation to estate regeneration.

### **Policy H11: Ensuring the best use of stock**

Part of London making the best use of its housing stock is about ensuring homes are occupied by the most appropriate people. Whilst the policy has some solid recommendations relating to the best use of empty dwellings, there is no provision within the policy for encouraging people

into homes that are appropriate for their needs. The Mayor must consider ways to encourage Londoners to move into more appropriate sized homes, and they must be extensively supported in doing so. For many older people, living in a home larger than they need can be problematic, and maintaining the property is especially difficult. However, adequate provision must be made by the Mayor to ensure people are not simply transplanted out of their social and local networks in order to free up homes for other people, as this risks creating fractured communities.

### **Policy H12: Housing size mix**

ACE highlights concerns that whilst this policy gives guidance to London boroughs over housing sizing mix, it provides no target to aim for. This is reflected in the wording of the policy subsections which highlights the role that one and two-bedroom units can play in helping attract those who want to downsize, but also suggests that schemes that consist of one and two-bedroom units should generally be resisted. To provide greater clarity on the matter, ACE suggests the Mayor sets clear targets about the housing size mix that London needs and should work closely with the London boroughs to establish what is best in specific areas.

## Social infrastructure

### **Policy S1: Developing London's social infrastructure**

ACE strongly supports any policy that highlights the need for excellent planning when it comes to the provision of social infrastructure. However, the wording of the policy could be strengthened to ensure more desirable policy outcomes. The policy should necessitate the replacement of infrastructure assets at a 1:1 ratio, in a similar way that affordable housing should be replaced to ensure that there is no net loss in terms of infrastructure provision. This would ensure that areas of new development can at least maintain their levels of social infrastructure.

Additionally, where proposals that result in the loss of social infrastructure assets are approved in exceptional circumstance, the Mayor should ensure that the replacement of these assets are in working order prior to the demolition of the old asset to ensure that there is no disconnect in service for users. Provision for this will help to ensure a smooth transition to new social infrastructure assets and limit the impact of development on the lives of Londoners.

## Green Infrastructure and Natural Environment

ACE has a number of comments on the plan's green infrastructure and natural environment policies, particularly on how they relate to the concept of 'placemaking'. ACE and its members are strong believers in how better planning, design and construction practices can create stronger communities and improve the wellbeing of individuals. ACE has recently developed a proposal to establish an All-Party Parliamentary Group focused on the social benefits of strong communities supported through quality designed infrastructure, and would be interested in working with the Mayor on this topic.

### **Policy G1: Green infrastructure**

ACE welcomes that the plan will provide guidance on the strategic green infrastructure network and the preparation of green infrastructure strategies. The importance of green spaces within placemaking is an important aspect for new developments. Furthermore, ACE believes tree planting can have a significant impact on air pollution and natural cooling of the city as a result of the heat island effect.

### **Policy G3: Metropolitan Open Land**

ACE supports the protection of Metropolitan Open Land (MOL) from inappropriate development. However, this should be considered in the context of placemaking for new developments and any MOL should be protected as a percentage of the overall development rather than specific areas.

### **Policy G4: Local green and open space**

Protecting and creating local green and open spaces is an important and essential element to improving placemaking for communities. ACE supports and welcomes this policy and believes all London boroughs should have targets for the percentage of green and open space created as a proportion of all new developments.

### **Policy G5: Urban greening**

ACE supports the Mayor's policy that development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design. We believe urban greening can significantly improve the look and feel of developments, and creates a more enticing environment for the community.

## **Policy G7: Trees and woodlands**

ACE supports this policy especially with the creation of new planting. The policy of planting trees can indeed help to trap and absorb air pollutants, providing shading, absorbing rainwater and filtering noise. Trees and woodlands also provides extensive areas of habitat for wildlife, especially mature trees. The urban forest is an important element of London's green infrastructure and comprises all trees in the urban realm, both in public and private spaces, along linear routes and waterways and in amenity areas.

We encourage all planning applications to incorporate some form of greening in the form of tree planting, be that directly associated with the development or associated by some form of green infrastructure.

## **Policy G9: Geodiversity**

ACE welcomes the geodiversity policy but would add that geodiversity needs to be considered alongside water infrastructure, specifically Sustainable Urban Drainage Schemes (SUDS) when developments are being planned on top of London clay where permeation of water is not physically possible, especially if the water table is already high during winter months.

## Sustainable Infrastructure

### **Policy SI1: Air quality**

ACE supports the intention of bringing forward the Central London ultra-low emission zone (ULEZ) given the scale of air pollution problems, however we are concerned the earlier implementation has been made more difficult by the lack of clarity over key details and the accreditation scheme not being completed.

The Mayor needs to be confident that the logistical challenges can be met, and technical standards agreed as soon as possible, in order to go ahead with the April 2019 start date. If the Mayor does not have this confidence, he may need to consider a 'grace period' in certain situations after April 2019.

### **Policy SI2: Minimising greenhouse gas emissions**

ACE welcomes that all new developments should be zero carbon, however experience suggests that this is not easy without clear SPG on zero carbon homes. ACE also supports that London boroughs must establish and administer a carbon offset fund. Offset fund payments must be ring-fenced to implement projects that deliver greenhouse gas reductions. The operation of offset funds should be monitored and reported on annually. Lastly, ACE is concerned there is no accountability of how carbon offset funds are spent, and further information should be included in the plan.

### **Policy SI3: Energy infrastructure**

ACE supports this policy however recommends that the Mayor should make provisions to encourage London boroughs and developers should engage at an early stage with relevant energy companies and bodies to establish the future energy requirements and infrastructure arising from large-scale development proposals.

### **Policy SI5: Water infrastructure**

ACE supports investment in strategic wastewater treatment infrastructure to accommodate London's growth. Reducing water usage across London should remain a high priority to maintain growth within the city. Grey water recycling, wastewater recycling and the development of innovations in water conservation should be encouraged.

## Transport

ACE agrees with the challenges to transport outlined in the plan, which notes London's success is reliant on a good public transport network. We particularly support the Mayor's link between a good public transport network and a high quality of life for Londoners, and how this relates to the city's development objectives.

ACE starts from the position that London needs high performing transport infrastructure. Without it there is little hope the city will be able to improve on the productivity of its economy nor meet social obligations to a growing population. If London is to truly meet its needs then it will need to go about this in a smart way, building where necessary but also upgrading and reorienting key assets to meet changing demand.

As technology continues to reshape the city, then the predictions and demands that are outlined by the Mayor will change as well. To this end, ACE suggests that the Mayor should ensure the digital revolution is at the heart of this plan. As part of this, we would support the Mayor mandating that the supply chain and developers optimise data to ensure better, faster and cheaper outcomes for Londoners.

The plan offers little choice to the public in their mode of transport and this will lead to a diminishing of public support for its outcomes. For instance, car ownership and usage are undergoing a revolution, and this will only accelerate in the coming years with autonomous vehicles.

### **Policy T1: Strategic approach to transport**

ACE supports the plan's target of 80 per cent of all trips in London by 2041 being by active or public transport. Naturally, these forms of transport are a more sustainable approach to moving large numbers of people around in such a dense and growing city and will help address congestion issues currently facing London.

What contributes to the 80 per cent target will naturally need to vary across London. For example, good public transport links and the close proximity of destinations in the Central Activity Zone (CAZ) means this location will need to contribute far more to the target than outer boroughs with poorer public transport connections and longer distances to travel. ACE recommends further information is provided on how different areas across London are currently contributing to the target and the change expected by 2041, and how planned transport schemes will achieve this target.

To ensure London's existing public transport network is capable of handling a significant increase in passengers by 2041, particularly in the already congested CAZ, the Mayor will need to ensure new transport schemes are designed in a way that maximises existing transport capacity. To this end, ACE believes the Mayor should include an enlargement of the interchange at Old Oak Common between High Speed 2 (HS2) and the Elizabeth line to create a major hub with future potential for connecting High Speed 1 to the junction. ACE therefore recommends the Mayor includes the enlargement of Old Oak Common between HS2 and the Elizabeth line in the indicative list of transport schemes in the plan and to engage with the HS2 team on this proposal.

The increased movement of freight and the use of private hire vehicles and ride share platforms will be the key issue for this policy. Whilst the Mayor has made a commitment to work with the freight industry to promote a more efficient and sustainable approach to moving freight, the plan does not mention anything on how the growing popularity of private hire vehicles and ride share platforms will impact this target and transport solutions for developments. This is a significant oversight, particularly as technology improvements are making this form of transport easier and more convenient, and ACE therefore recommends the plan comment on private hire vehicles and ride share platforms.

Lastly, ACE recommends the Mayor identify which proposed transport schemes included in the plan will likely require funding support from the UK Government (i.e. Crossrail 2) to ascertain their current funding status.

## **Policy T2: Healthy Streets**

ACE supports the intent of the Mayor's healthy streets approach. We note this approach is a significant societal change and will require 'buy in' from the community to be successful. However, ACE believes the change can be achieved by focusing on the benefits of the approach, as opposed to negatives about the current behaviours that the Mayor is seeking to change. For example, the Mayor could focus on promoting some of the lifestyle benefits from this policy.

The Mayor's ten healthy street indicators is a great summary of what makes a street more attractive and what encourages the increased use of active and public transport. ACE therefore strongly supports the Mayor's policy to ensure new developments and public realm schemes are delivering improvements against these indicators.

### **Policy T3: Transport capacity, connectivity and safeguarding**

ACE supports the Mayor's transport capacity, connectivity and safeguarding policy. As highlighted in the plan, London's transport network will need to cater for over five million additional trips every day by 2041. London's limited ability to grow outwards means a smart and strategic approach is required to absorb these additional trips in the transport network. A commitment to refuse development plans and proposals impeding on London's ability to expand its transport networks is a good start, however ACE recommends the Mayor also provides a view on if the proposed changes to the network that are outlined in the plan will be able to meet this additional demand. By including additional rigour in the plan or discussing the logic behind this policy, the Mayor may be more successful at selling the case for proposed transport schemes, particularly those that need financial support from the UK Government.

The Mayor also needs to ensure that there is sufficient funding available to maintain and renew existing transport infrastructure. Currently, renewals on the London Underground are being cancelled to meet funding constraints which if unaddressed will only result in future impacts on passenger performance levels.

### **Policy T4: Assessing and mitigating transport impacts**

The Mayor's approach to assessing and mitigating transport impacts from development plans and proposals is positive. ACE supports the requirement for transport assessment to be included with planning applications to ensure developments are being assessed for their transport impacts and to ensure they are contributing to the Mayor's healthy streets approach.

One area of concern we have is a lack of clarity over how this policy works if there is a gap between the completion of the development and a planned transport connection. We recommend the Mayor provides further clarity on the circumstances a transport assessment for a development will be approved when planned transport connections are some way off completion. ACE believes this is an important addition to this policy due to the adverse impact delays in the delivery of transport schemes can have on the delivery of other schemes such as housing.

## **Policy T5: Cycling**

ACE is supportive of the plan's focus on increasing cycle parking around developments. Having a safe space to lock up a bicycle and the beginning and the end of a journey will significantly increase the uptake of cycling in London. However, ACE has some concerns with how the plan's policy does not discuss or appear to consider London's cycle network. While the plan naturally needs to focus on cycle parking and how this relates to developments, ACE recommends the policy should also discuss how London's cycle network will also influence development decisions.

## **Policy T6: Car parking**

ACE agrees with the plan's approach to car parking. Car ownership in London is much lower than in the rest of the United Kingdom and we are seeing the proportion of households in London that own a vehicle in decline. Coupled with significant improvements to public transport and the uptake of carsharing and ride share platforms, it is logical that the Mayor wants to reduce the overall number of car parks across the city.

We recommend the plan should also discuss reducing the number of off-street parking and to reuse this land for housing, active transport and greenspace. This approach aligns well with the Mayor's healthy streets approach and housing targets. Lastly, while we support an overall reduction in the number of car parks across London, we believe the Mayor should concurrently encourage an increase in the number of car parks with vehicle charging technology, including by retrofitting carparks in redevelopments, and should set targets around its provision.

## **Policy T8: Aviation**

The plan rightly recognises the importance of aviation to London's economic success and the need for additional runway capacity in the South East. However, the Mayor's position that Heathrow Airport expansion should not go ahead unless it can be shown that there will be no additional noise or air quality harm is an unrealistic expectation. This position also appears inconsistent with the Mayor's view on expansion in other locations, such as Gatwick Airport.

ACE therefore recommends a more balanced approach to the policy's position on Heathrow Airport expansion, with a more realistic expectation that the airport (in addition to other airports in the South East) is a world leader at reducing noise and air quality harm.

## **Policy T9: Funding transport infrastructure through planning**

ACE supports the plan's funding transport infrastructure through planning policy, including the proposal for the Mayoral Community Infrastructure Levy 2 (MCIL2). We believe reasonable Community infrastructure levies and planning obligations are essential to ensure strategic transport projects can be funded across London.

Lastly, ACE believes the Mayor should commit to ringfencing funding from planning obligations on specific infrastructure projects in the area where the revenue was collected.

## Delivering and Monitoring the London Plan

The plan offers a strong and positive vision for London over the next 20 to 25 years, however the key challenge will be the ability to implement this vision. ACE believes implementation challenges include the introduction of new technologies, limitations to GLAs current powers, significant funding requirements and commercial limitations on developers to meet all policies in the plan.

ACE believes changing technologies, particularly unanticipated 'game changers' have the potential to significantly disrupt the delivery of the plan. Looking backwards, it was extremely difficult to predict changes that have been introduced over the past 25 years, particularly the uptake of the shared economy, and we can only assume unexpected changes will also take place over the next 25 years.

Some of the policies included in the plan will be difficult to deliver without additional powers to GLA, from both the UK Government and London's boroughs. ACE notes there has been a national shift to increasing the remit of city regions, and London is in a good position to push for equivalent powers to those included in recent city deals and for greater financial control.

### **Policy DF1: Delivery**

The cost of implementing the plan is a key limitation. The plan estimates a funding gap of higher than £3.1 billion per annum. ACE therefore supports the Mayor's intention to seek clarity from the UK Government on the availability of investment for infrastructure in London and further devolution of fiscal powers in line with the recommendations of the London Finance Commission. We believe that the community's infrastructure needs are best delivered at a regional and local level.

Lastly, ACE supports the Mayor's intention to explore new innovative options for raising funding to deliver the London Plan. The UK Government and the Mayor's commitment to establish a joint taskforce on funding infrastructure from land value uplift is a positive example.

### **Policy M1: Monitoring**

ACE agrees on the importance of having a set of succinct key performance indicators and measures to monitor the implementation of the plan's priorities. ACE makes the following recommendations below based on the performance indicators and measures included in the draft plan.

- There needs to be a percentage target of affordable housing delivery. We note that this is not included in the Mayor's housing performance indicators and measures, despite the Mayor campaigning for 50% of new housing being 'genuinely affordable' during the 2016 mayoral election and more recently setting a target of 35% as a step to achieving the higher target.
- There needs to be a performance indicator and measure about the quality of transport services. While the Mayor's measure of increasing the mode share of walking, cycling and public transport to 80% by 2041, the quality of public transport services must not reduce as a result.

## About ACE

As the leading business association in the sector, ACE represents the interests of professional consultancy and engineering companies large and small in the UK. Many of our member companies have gained international recognition and acclaim and employ over 250,000 staff worldwide.

ACE members are at the heart of delivering, maintaining and upgrading our buildings, structures and infrastructure. They provide specialist services to a diverse range of sectors including water, transportation, housing and energy.

The ACE membership acts as the bridge between consultants, engineers and the wider construction sector who make an estimated contribution of £15bn to the nation's economy with the wider construction market contributing a further £90bn.

ACE's powerful representation and lobbying to government, major clients, the media and other key stakeholders, enables it to promote the critical contribution that engineers and consultants make to the nation's developing infrastructure.

Through our publications, market intelligence, events and networking, business guidance and personal contact, we provide a cohesive approach and direction for our members and the wider industry. In recognising the dynamics of our industry, we support and encourage our members in all aspects of their business, helping them to optimise performance and embrace opportunity.

Our fundamental purposes are to promote the worth of our industry and to give voice to our members. We do so with passion and vision, support and commitment, integrity and professionalism.

### Further information

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