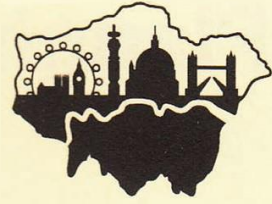


The **London Forum** of
Amenity and Civic Societies



working to protect and improve the quality of life in London

London Forum *Insights*

Issue 15, July 2023

Editorial

With the Levelling Up and Regeneration Bill completing its painful journey through the Committee Stage of the House of Lords and the Report Stage starting, much of the Forum's energies have been taken up with the numerous Government and Mayoral consultations. These have covered topics such as the proposed Infrastructure Levy, regulating the Short Term Letting sector, re-letting of empty High Street properties and London Plan Guidance on Affordable Housing and Viability Assessment.

We also report on the Forum's Open Meeting on Affordable Housing with leading academic, Duncan Bowie and a GLA team. Trustee Mary Hogben opens up a discussion about the merits of Design Review Panels and invites members' comments. In a similar vein, the Forum's Darian Mitchell and David Kaner share their experience of Safer Neighbourhood Panels and ask whether this is a topic of interest for members.

We draw members' attention to the long-awaited adoption by the Mayor of four volumes of London Plan Guidance on Characterisation, Design and Site Optimisation, alongside shorter articles which bring members up to date on topics covered in earlier issues. And of course no issue would be complete without Andrew Bosi's transport round-up, or Michael Hammerson's and Helen Warner's Round the Societies.

Finally you are reminded that the annual London Forum Summer Reception will be held on the roof of the building we inhabit courtesy of Alan Baxter at 70 Cowcross Street, London EC1M 6EJ on Tuesday 22 August from 18.00 – 20.30 hrs. We hope to see many members there.

The London Forum needs You!

Following on from the recent strategy review, the Forum is setting up a **Member Services Committee** to strengthen the ties between the Forum's core team and member societies. We see the Committee as having two broad aims:

1. To ensure that the Forum's activities are closely aligned with the needs of member societies
2. To increase our capacity to deliver what members want by enhancing key skills such as member communications, event management, and maintaining our infrastructure

We are now seeking individuals from member societies to join the Membership Services Committee. The level of involvement need not be onerous, and can be tailored to personal circumstances. The committee will be chaired, at least initially, by Forum Vice-chair Paul Thornton; and trustees Clare Birks and Helen Warner have also agreed to be on the committee. We will review after a year.

If this sounds like something you could help with, do please get in touch by contacting Paul (pthorntongb@icloud.com) or Clare (secretary@londonforum.org.uk) for an initial chat.

Open Meeting on Affordable Housing

There was a packed agenda at the recent open meeting where the subject was housing in London. Duncan Bowie, now a retired academic and former planning practitioner, spoke widely on the housing policy issues confronting the government and the Mayor. He was followed by a series of speakers from the Greater London Authority (GLA) who spoke about current planning and housing policies and how they are being developed. The meeting concluded with a short presentation from one of the GLA surveyors who is involved in some of the analysis around viability.

Duncan's talk focussed on the absolute shortage of housing supply in London, how the existing market works and how to get more genuinely affordable housing rather than housing at 80% of market rent levels, which is what has come to pass as affordable housing in recent times.

Among Duncan's suggestions were the need to pump up the public social rented sector where rents are commonly around 40% of market levels, the

need to regulate the private rented sector better with a push for a municipalisation programme and the importance of using specific planning briefs on more of the larger sites rather than relying on generalised guidance on need and viability.

John Wacher and Mikayla Smith did a double act as current GLA professionals in the housing and planning world. John spoke about his specific experiences in Islington where the Council had held firm on viability issues. It led to a process where the courts eventually prompted the RICS, the professional body responsible for the conduct of surveyors and valuers, to look again at how surveyors routinely deal with such issues as what is the basic value of land for development when there is clear and well evidenced planning policy based on the need for affordable housing. Jane Seymour followed up with an outline of how GLA surveying professionals support the Mayor's efforts to squeeze up levels of affordable housing from developers.

Postscript

In the run up to the above event, the GLA launched consultations on London Plan Guidance documents on Affordable Housing (see [here](#)) and Viability (see [here](#)). These will replace the 2017 Supplementary Planning Guidance on both topics, bringing it into line with the current (2021) version of the London Plan. The consultations close on 24th July. The Forum will respond on Affordable Housing, and may do so on Viability. Members who would like to know the detail of these proposals are referred to a GLA webinar [here](#), and to the Simonicity blog [here](#) from Simon Ricketts of Town Legal LLP.

London Plan Guidance on Design

Both central Government and the GLA have laid increasing emphasis over the past 4-5 years on design-led approaches to planning. Last year the GLA published consultation drafts of four documents providing guidance on how such approaches relate to the policies set out in the London Plan. The final versions of this set of London Plan Guidance (LPG) documents were published last month. They are closely related to each other, and to the [National Model Design Code](#) (NMDC) published in 2021. All four LPGs are directed at planners, developers, architects and others involved in developments; but like the NMDC, all stress the importance of community engagement in the processes they set out.

The first, under the somewhat forbidding title [Characterisation and Growth Strategy](#), sets out a process for assessing the character of different

neighbourhoods within a borough, using the [London Historic Character Thesaurus](#), with the aim of understanding each area's sensitivity to change. The level of change and capacity for growth for each area – typically conserve, enhance or transform - can then be determined, in consultation with local communities. Area-wide visions, policies and codes can then be developed, again involving local communities.

The second and third LPGs follow from the first. The [Small Site Design Codes](#) LPG, as its title suggests, covers incremental intensification of small sites, from identifying what the codes should cover, through the development of a design vision and principles, to preparing and implementing the codes. For larger sites, the [Optimising Site Capacity: A Design-led Approach](#) LPG sets out how the design-led approach, set out in [Policy D3](#) of the London Plan, should be applied. The aim is to set site-specific design parameters and codes for development sites to provide clarity on key issues including indicative housing capacity, using an [Indicative Site Capacity Toolkit](#). Through an iterative process of analysis, design and testing, again with proper community engagement, the most appropriate form of development on a site can be determined.

The fourth LPG covers [Housing Design Standards](#), and provides in one place a checklist of London Plan policy requirements for new build, change of use and housing conversions, with appropriate cross references back to the relevant policy in the London Plan and guidance about the type of development different standards apply to. It covers a wide range of issues under the headings of Placemaking and Public Space; Shared and Ancillary Spaces; and Homes and Private Open Space.

All four LPGs provide a wealth of examples, and opportunities for member societies to engage both with planners as they seek to establish policies, codes and Local Plans, but also with developers bringing forward proposals for individual sites. The Forum is considering how it might help member societies become more aware of these four LPGs. As a first step, we are hoping to organise an open meeting in the early autumn, ideally with participation from the GLA Planning team.

Transport Matters

TfL funding

There has been better news recently, with ridership closer to pre-pandemic levels during the week and exceeding them on Saturdays. TfL now expect to record an operating surplus by March 2024 and the Mayor has pledged that

money made from the expanded ULEZ will all be used to improve outer London bus services and cycle lanes.

All 33 London Boroughs/ Corporation have through London Councils issued a letter of support for a resumption of work on Crossrail2 and the Bakerloo line extension. But despite the foregoing, TfL remains dependent on central government funds for enhancements of this nature and there is no money over and above that being spent on building (or pausing) HS2. Moreover, with the uncertainty about HS2 coming to Euston it seems pointless to work on the revised route of Crossrail2 (designed to disperse HS2 passengers at Euston) when the original route was more appropriate to the needs of Londoners.

The Bakerloo extension would result in greater use of the existing Bakerloo line and represents good value for money as a result, but the best short term returns would be gained from acquiring the extra carriages to extend Elizabeth Line trains to 11 cars, and the re-signalling of the Piccadilly line which would increase capacity without the cost of new track and new stations.

Although patronage of the Elizabeth Line has exceeded expectations, numbers on the Barking Riverside extension of the GOBLIN (**G**ospel **O**ak to **B**arking **l**ine) are low as yet. However, as housing is developed in Barking Riverside the benefits will appear.

Liverpool Street station

There is much opposition from organisations concerned for the London's built environment at National Rail's plans to revamp the station, which they claim has become overcrowded. The Victorian Society has included Liverpool Street station in its list of buildings at risk. Although the Elizabeth line has removed the need to change trains for some, it has generated far more new custom. Unfortunately, there is no public money for this scheme and so it has to be funded by a development which inevitably includes another tall office tower. It compromises the Great Eastern Hotel, and demolishes the attractive if pastiche buildings created in the last revamp. There has been pre-application consultation so far; a formal application is expected soon.

Design Review Panels

Forum Trustee, Mary Hogben asks members to share their experiences

There has been a recognition in recent years that much new development is not well designed. The Government has introduced through their National Planning Policies a number of guidance documents on design, including the

concept of **Design Review Panels** (DRPs). The majority of London Boroughs now use DRPs to assist their Planning department particularly at pre-application stage. A survey carried out by the Mayor in 2022 confirmed what many of us already knew; Local Authorities across London lack the capacity and the specialist expertise needed for effective development management. The survey showed that of the 32 Boroughs plus the City of London, 27 used DRPs, 3 were setting one up, and 3 have no panel. Of those with a panel the split between in-house and external management was about equal. 63% self-reported that they were compliant with the London Design Review Charter, 33% reported their panels were not representative of the communities they serve, 30% felt they were and 36% did not know.

Given the urgent need to eliminate poor design, the introduction of these panels should surely be welcomed. Local Authorities can encourage the developer to request a review, the cost of which is born by the latter. Organisations that run design panels draw upon a forum of professionals, experts in their respective fields, to supply the most appropriate expertise for the project. Their service should be impartial and provide an early opportunity to discuss options for developing and improving the design with the developer's design team. Ideally the first review would be in the early stage when design principles are being established with follow up reviews as the design progresses. Panel members will be well aware of the need to consider not just whether buildings are 'fit for purpose' but also their long-term impact on users, residents, neighbours, the urban scene, environment and the planet.

Yet there is anecdotal evidence that some Forum members are sceptical about the pre-application process in general and the work of DRPs as being yet more 'behind the scenes' activity, prior to the community knowing anything about the proposals. With most schemes being led by a commercial developer, it is perhaps unsurprising that considerations of design improvements and their impact on viability take place before consulting with the local community. In an ideal world the inclusion of the community in the co-creation of a design would lead to better outcomes, but at the moment the process does little to encourage that, with consultation on the finished design being the accepted method of compliance. Some organisations however are encouraging a separate Community Panel to run in parallel to the DRP (readers can find more information on the Lichfields blog [here](#)).

How should we assess the effectiveness of the DRPs in improving design? The only way for the public to see this will be in the finished product; does it promote community cohesiveness, how do new residents find it, does it promote a good healthy lifestyle? The original panel will, if asked, be able to chart any improvement through the process. Actual evidence could and should be gathered through post occupancy surveys, but rarely is.

If your Society has experiences it would be happy to share, please contact us at london_forum@icloud.com.

Briefly Noted

Adaptable Homes

In his monthly column in June's Housing Today, London Forum President Ben Derbyshire reprises the **Long Life, Loose Fit, Low Energy** mantra of Alex Gordon, RIBA President in the early 1970s. The need for adaptable homes is more pressing than ever, argues Derbyshire, given the fight against climate change and the need not to squander the carbon embodied in today's housing stock. He foresees great problems with the shoebox or rabbit hutch homes built in the last half century, which are anything but adaptable. By contrast, homes built to the 1960s Parker Morris standards are now seen to have stood the test of time.

“The miserable race to the bottom in space standards for new homes means we never get to the starting line of conditions necessary for workable, enjoyable, loose-fit accommodation.”

More space, contends Derbyshire, will cost a bit more to build, but mandating better space standards everywhere will be offset by reduced land values. But the real saving will be in homes that last and last.

Can London's Skyline still be Saved?

Two apparently unconnected articles on tall buildings caught our eye a short while ago. Historic England Chief Executive, Duncan Wilson called for a more coordinated approach to regulating high-rise development to give residents greater input and ensure the capital's architectural treasures and views are not lost forever. Wilson acknowledged proposals from the City of London Corporation to introduce more prescriptive rules about acceptable locations for high-rise development. But he said that these plans do not go far enough and that a pan-London approach to prevent further harm to London's skyline is required – see [here](#)

The second article reported Lambeth Council's approval of the Kennington Stage scheme for a 14-storey tower surrounded by 2- and 4- storey blocks. This followed the failure of the developer's appeal against the Council's rejection of an earlier 29-storey proposal. An object lesson in keeping one's nerve?

London Forum members should be pressing their councils to adopt clear policies, ideally enshrined in up-to-date Local Plans, about locations that are suitable for tall buildings; and hold their feet to the fire for adhering to these policies.

Holocaust Memorial

In 2016 The Government announced that a Holocaust Memorial would be built in Victoria Tower Gardens. just upstream of the Houses of Parliament. Yet the Holocaust Memorial Bill had its Second Reading only on 28th June this year. The delay to a project that has the strong support of both the Government and the Labour Party has been extraordinary, and due to tenacious opposition, not to the creation of a Memorial but to its location, by a large number of people and organisations, including the Thorney Island Society.

It was evident that Westminster Council were not going to grant the scheme planning permission; the Secretary of State therefore took it over from the Council and granted permission; a Judge then found that this permission was trumped by protection given to the Gardens by the London County Council (Improvements) Act 1900.

In February this year the Government introduced the Holocaust Memorial Bill to remove the protection in that Act. The lengthy period between introduction and Second Reading was because the Bill was ruled not to be an ordinary Public Bill but a Hybrid one; Hybrid Bills are so called because though they are sponsored by the Government they affect some specific private interests differently from others of the same class. It is possible for people affected by a Private or Hybrid Bill to petition against provisions in it, and be heard by a committee in each House of Parliament. That procedure will now begin in the House of Commons.

Getting from DAD to EDD

Reporting from an online book launch, former Chief Planner, Steve Quartermain CBE noted recently that communities feel that “planning takes a DAD approach to community engagement (Decide/Announce/Defend) when an EDD process (Engage/Deliberate/Decide) was needed.”

Challenging the view that nowadays planners are in the pocket of developers he wrote “Getting the right development in the right place is on every local government planner’s agenda. Their mission is to make life better for the public good. Too often the argument is polarised and engagement mistaken for opposition. Planning is about mediation and compromise. I am not suggesting a Mormon-like conversion is needed, but perhaps we need to do more to establish some core truths.

- Why do we need more development?
- Who is the development for?
- Can we accommodate this level of change without environmental harm?

Perhaps this could be examined as a first stage of a plan preparation. Once accomplished, the focus of community engagement would be agreeing the right place.” If only!

Responses to Government Consultations

Each of the consultations below was to test opinion on topics in the Levelling-Up and Regeneration Bill. London Forum's comments on them have been advised to Lady Hayman in the Lords for consideration when Peers debate those parts of the Bill in the Report Stage commencing as this issue of Insights goes to press.

A new Use Class for short term lets?

The London Forum has responded robustly to a Government consultation on whether there should be a new Use Class for short term (holiday) lets such as Airbnb. With well over 60,000 homes now wholly or largely used for this purpose, we are greatly concerned at the loss of residential accommodation and the displacement of residents by tourists. The problem is most severe in the inner London boroughs of Kensington & Chelsea, Westminster and Camden. The consultation also raises the prospect of yet another Permitted Development Right which would crystallise the loss of housing to the new use class, bypassing the planning system yet again. The Forum's response to the consultation can be seen [here](#).

High Street Rental Auctions an unintended threat to Pubs

The Government is consulting on its proposals for High Street Rental Auctions as a means of bringing empty buildings on our high streets back into productive use – see [here](#). The London Forum broadly supports these proposals, though the extensive provisions to make sure that landlords get a fair deal mean that the entire process is very “officer-intensive”, so there may be little or no take up in many Local Authorities.

However one provision causes us great concern, and this is the introduction of two new permitted development rights (PDRs). CAMRA has rightly drawn attention to the fact that these new rights would withdraw the protection that makes the conversion of high street pubs to other uses subject to full planning consent – see [here](#). The proposals mean that any vacant building on the high street can be converted without the need for planning consent to any Class E use, or to any use on a list of acceptable high street uses prepared by the Local Authority. Furthermore, the consultation questions whether even Prior Approval is necessary.

The first of the two PDRs allows this to happen for the initial lease period of up to 5 years following the High Street Rental Auction. The second allows the change of use to be made permanent following expiry of the initial lease period. There is no exemption for listed properties, for properties in Conservation Areas, AONBs, World Heritage Sites etc. The proposals impose no limit on the

size of property that can be subject to such a rental auction; breaking the property up into smaller units and sub-letting will be allowed.

Proposed Infrastructure Levy misguided

The Levelling Up and Regeneration Bill proposes a new Infrastructure Levy (IL) to replace the Community Infrastructure Levy (CIL) and Section 106 obligations. Our response to the consultation is [here](#).

The London Forum is not persuaded that the arrangements for the proposed Infrastructure Levy will achieve better outcomes in London for either necessary infrastructure provision or for much needed affordable housing. Much of the argument for the proposed Levy seems to be based on the premise that there is scope for a higher level of land value capture across the country than is currently achieved via the existing CIL and Section 106 arrangements. In London local planning authorities have great experience of setting appropriate CIL rates and negotiating strongly on Section 106 agreements. The complexity of the new regime now proposed can carry no guarantee that it will provide more affordable housing than at present, and a substantial risk that it will provide less.

The Forum's view is that it would be more advisable for the Government to focus its attention on improvements to the existing CIL and S106 system which could include the following:

1. Requiring all local planning authorities to set a CIL within a given time period unless detailed analysis shows setting a CIL would render development unviable
2. Requiring all local planning authorities to prepare an Infrastructure Delivery Strategy in connection with their CIL with a matching requirement that all infrastructure funders and providers should have a duty to co-operate in the production of such a strategy.
3. Where S106 agreements are used, enabling local planning authorities to include provisions for additional payments to be made by developers where sales values exceed those set out in initial agreed viability assessments.

Amenity Societies and Community Safety

The Forum's David Kaner and Darian Mitchell seek your views.

In the most recent edition of the GLA's survey of the priorities of Londoners, 35% of respondents put 'tackling crime and making London safer' as the first or

second most important priority, ahead of building more affordable homes or tackling air pollution. This leads us to wonder to what extent Forum Members are actively involved in the various Police Consultative bodies which exist across London.

Every ward in London has a Safer Neighbourhood Panel (SNP) where members of the local community can work with their local Safer Neighbourhood Team on the concerns of the local community. These SNPs often also include local Councillors and the Council Community Safety Team. At the Borough level there is usually a Safer Neighbourhood Board (SNB) which brings together various volunteer groups that work with the Police as well as Senior Police and Council Officers. The SNBs are funded to carry out projects which address the Mayor's Police and Crime Plan Priorities.

Taking part in the work of the SNPs and the SNB can be very rewarding. Forum Trustee Darian Mitchell has told us about her experience in Clerkenwell.

Back in 2010 the Amwell Society was approached to see if we were interested in joining the local Safer Neighbourhood Panel (SNP) which covered Clerkenwell in South Islington. I volunteered to join the panel on behalf of the Society. The panel was made up of the Clerkenwell Safer Neighbourhoods Team, which consisted of a Sergeant, two PCs and a PSCO (Police Community Support Officer), and members of the local community representing a single square, street or estate. We met regularly and local residents would bring their problems with anti-social behaviour to discuss with the police and work out a plan of action to improve the situation. Most of the grievances were about drug dealing and rowdy behaviour late at night, and working with the police we were able to get some surprisingly good results. The panel was also an opportunity for the police to tell us about the prevalence of crime in Islington in general terms and what they were doing about it. In effect the SNP was a direct channel of communication between the police and the local community. There was also an Islington Safer Neighbourhoods Board (SNB) which covered the whole borough and was attended by the Borough Police Commander and the Council Member for Community Safety. At one point the chair of our Panel was also the chair of the Board. As is often the case with community involvement the membership of both the local panels and the Board could be erratic, but in Clerkenwell we have persisted, and I have been involved for many years. I believe that SNPs and SNBs can be constructive and genuinely helpful and are well worth supporting.

Other have had similar experience to Darian but we know from reading the aims and objectives of several of the societies in the London Forum that some work closely with their local police while others have no contact with the police at all. We would like to know whether Community Safety (of which SNPs and SNBs are a part) is a subject which you would like to Forum to cover in more depth and especially whether you would be interested in us having an open meeting on the topic.

Round the Societies

Highlights from members' newsletters selected by Michael Hammerson and Helen Warner *For Michael's fuller report see [here](#)*

The **Thorney Island Society** are trying to protect Victoria Tower Gardens, where the UK Holocaust Memorial and Learning Centre is scheduled to be built by the Government, thereby removing free-to-access public park land. Following the High Court ruling that the 1900 Act prohibiting construction in the Gardens compromised the project's deliverability, the Government has now introduced new legislation to repeal the 1900 Act – see article in “Briefly noted” section.

The **Wimbledon Society** give an update on All England Lawn Tennis Club (AELTC) plans to develop the Wimbledon Park Golf Course. It's Metropolitan Open Land, a Site of Importance for Nature Conservation, a Grade II* Listed Park and a Conservation Area. With local Residents' Associations, a campaigning group *Save Wimbledon Park* has been set-up to oppose the plans. The **Barnet Society** report on 33 Lyonsdown Road, where inconsistencies in planning law made “the Council powerless to prevent its demolition”. The Victorian Society is so concerned about this and similar cases that it has raised the matter in the House of Lords.

The **Hammersmith Society** say their Council's Community Schools Programme plans to use school land for blocks of flats. With ten other amenity societies and resident groups, the Society has launched a petition, *Stop the Sacrifice of School Land*, warning that such a move could set a precedent.

The Victorian society say councils in London and the Home Counties are currently planning to allow building on 48,000 acres of Green Belt - the combined area of Barnet, Camden and Enfield. So, nice to hear from the **Open Spaces Society** that the 2019 petition in Parliament to regularise the management of Monken Hadley Common, has now secured the site from development forever.

The **Isleworth, Kew and Teddington** societies all give attention to Thames Water's *Draft Water Resources Management 2024*. The societies have concerns about the proposed transfer (abstraction) of Thames water to the Lee Valley reservoirs via a tunnel and harm already caused by the number of times partly treated sewage has overflowed into the Thames and local rivers when the Morden Sewage Works becomes overloaded after heavy rain.

The **Greenwich Society** along with others in Lambeth and Newham, are concerned about potential noise, crowd control and environmental impacts of the arrival of the Ocean Diva giant disco boat moored in the Royal Docks. The **St Marylebone Society** report on progress with air quality monitoring. Preliminary results show a marked drop on air pollution levels since 2019.

The **Pinner Association** report the introduction of cashless parking across Harrow prompted by the Government switching off the old 2G signal. They comment on three controversial prior approvals for new 5G telecom masts and cabinets. The **Westcombe** and the **Blackheath societies** are also objecting to 5G poles being placed in the conservation / Greenwich World Heritage Site buffer zone. The **Mill Hill Preservation Society** report that two proposed masts have been refused, one went to appeal but was dismissed by the Inspector.

Across London we see concerns on building heights from proposed mid-rise 5 and 6 storey blocks in **Teddington**, proposed 15 story blocks in **Sydenham** on the former gasholder site at Bell Green, (twice the height of any other residential development in the area), the proposed 150 metre tower in **Islington** on the Moorfields re-development site, to the Paddington Green regeneration project in **Marylebone**, (with 39, 24 and 17 storey tower blocks). Notably this scheme (38% 'affordable housing'), has been called in by the mayor to be determined by the GLA rather than Westminster Council.

Dulwich now has some parking bays for e-bikes and e-scooters to avoid the hazard of bikes being abandoned on pavements. Riders who fail to use them will incur charges and possibly a fine. These bays are now in a number of boroughs, but feedback suggests they have not yet solved the problem.

A new advertising / defibrillator kiosk has been installed in **Streatham**. Operated by JC Decaux in tandem with the Community Heartbeat Trust Charity, pioneering the roll out of defibrillators across the UK. The **Teddington Society** celebrate their 50th anniversary. The **Wimbledon Society** their 119th AGM. The **Peckham society** had 'showbiz glamour' following the premier of movie Rye Lane. A bench dedicated to veteran campaigner (and London Forum committee member) Alastair Hanton was installed in **Dulwich**. Penny

Gluckstein, **Mill Hill Preservation Society** member, was awarded an MBE for her services to the community in Barnet.