

ISLINGTON *news*

The Journal of the Islington Society incorporating FOIL folio

Council leader makes enforcement pledge

In a speech to the Islington Society at its January meeting, Council leader James Kempton announced that the Council would be relaunching its planning enforcement service with stronger powers. Later in the meeting, the Islington Building Preservation Trust made a second news breaking announcement: that it was willing to fund a study into the refurbishment potential of the Ashmount Primary School building.

Leader's address

Cllr. James Kempton, recalling his birth in Arundel Square (and later clarifying how it was pronounced in the 1960s), gave the Society a potted autobiography as background to his aims as Council leader. He was surprisingly frank in admitting past mistakes, notably over Barnard Park which now weighed heavily in the consideration of the future of Ashmount School. Despite some economic and educational arguments in favour of relocation, he was wary of repeating the mistake of taking open space for perceived good if the public were to perceive it otherwise.

After developing the theme of listening to Islington by discussing the nature of consultation, James concluded that he had heard the concerns about development control. He recognised that planning conditions were of no use without enforcement, and was therefore announcing the restoration of a dedicated enforcement team. This was warmly welcomed by members present: and one member, speaking as an architect, said it would make persuading developers to follow the rules much easier. At present they asked what was the point when others were getting away with breaches of the Council's rules because they could be confident they would not be enforced.

Ashmount School Building

The consultation over alternative plans for Ashmount School was the subject of much critical comment from the floor. Members felt that it had been biased in favour of the demolition/relocation option, contradicting what the Leader had said about genuinely seeking people's views. The Chairman of the Islington

Building Preservation Trust, David Gibson, announced that the Trust was so concerned that a proper evaluation of the refurbishment potential of the existing building had not been made, they were offering to fund such a study. The consultation document dismissed the option on the basis of a would-be developer's assessment. The IBPT offer was confirmed in writing the following day.

Wide ranging discussion

These two major announcements did not preclude a discussion of other matters. On schools, Cllr. Kempton had welcomed the first Academy and played down concerns that it was creating surplus places. Subsequent changes at Islington Green would reduce the increase to 60 places per annum after one year at 120. There was concern about plans for Archway, its impact on Nag's Head and whether Nag's Head stakeholders would have enough say. Some felt the demise of voluntary bodies like the Conservation Advisory Committee had cast aside meaningful consultation: Cllr. Kempton seemed to accept this. Another member suggested that the leader's concerns on poverty could be addressed by developing a mentoring scheme across the Borough. Parking inevitably was raised, and again Cllr. Kempton seemed to accept that the Arsenal match day scheme might be relaxed and that the last administration had been "over-enthusiastic on the aspiration front" in considering traffic calming measures in Barnsbury.

- *We hope to provide a fuller account of the January meeting later in the year.*

Local democracy exonerated

In a judgement whose repercussions have filled the pages of the *Camden New Journal* for weeks, Cllr. Brian Woodrow has been exonerated from charges brought by Camden officers against his chairing of the Planning Committee. The subsequent defiance of council officers, and revelations about the lengths they took to ensure that the Planning Committee approved an outline planning application for the King's Cross Railway Lands, suggest that it is local democracy itself that is on trial.

Councillors and the public

Planning committees are by law made up of councillors and the policy of allowing co-opted members with particular expertise a vote has been outlawed for several years. Councillors are accountable only to the residential electorate. Their responsibility to the business community, tenuous at best in the past, has been removed by the Nationalisation of the Business rate which local authorities collect on behalf of central government for it to redistribute.

If the people who exclusively are charged with determining planning applications owe their continuance in office to the continued support of their electorate, it would seem logical that they weigh carefully the keenly expressed views of that electorate before making any decision. Yet Camden's officers have sought to impose a doctrine of denied access, reducing councillors to the status of an enclosed religious order. To make matters worse, the self-denying ordinance does not appear to extend to social contact with a developer.

Questioning officers' advice

In subsequent correspondence, officers have defended their decision to refer Cllr. Woodrow (who has like the Islington Liberals similarly referred, faced excessive legal costs but has had to meet them himself) to the Standards Board, and

have even affirmed that it its councillors duty to accept unquestioningly the advice of officers in their fields of expertise. This has unsurprisingly prompted many contributions to the correspondence columns of the *CNJ*. It is clear that the now ruling Liberal/Conservative coalition is not in agreement with the unelected officers.

Advice to members

It has emerged that the advice to members was long on the supposed catastrophic effect of not taking the decision to grant permission themselves, and short on time to consider the detail. An officer's memorandum, ironically brought to light by the Standards Board enquiry, was issued just as the Labour Group was about to appoint or reappoint its committee chairs. When it came to the planning decision, members received an 893 page report a week before the committee met, albeit that a draft version containing most of it had appeared eleven days earlier. Campaigners hoped that the change of control in May last year would signal a change of policy when the issue returned to the planning committee, but this did not happen. Cllr. Flick Rea acknowledged at the Camden Society AGM that members had been warned of possible legal costs if a rejection had been overturned on appeal.

Opponents are considering a legal challenge.

New threat to shops

The Society meeting at the end of January (see front page) unfortunately clashed with a meeting of the Council's Overview Committee which was considering plans to sell-off properties including shops and pubs. The ruling Liberal Democrat group no longer has an open mind on this matter: it has reached the conclusion that owning pubs and shops is not necessary or appropriate. A large attendance from the public clearly disagreed: they fear that the sell-off will lead to increased rents, forcing out the shops in order to replace them with more lucrative residential uses. Ironically, market forces are skewed further than ever towards residential use. However, shopping fronts like the one in Amwell Street are protected under the Council's planning policies and should therefore benefit from the relaunch of the enforcement team. The sell-off is not confined to shops. One property affected is that rented by the Islington Bangladeshi Association (IBA) for whom there is less comfort in the Local Implementation Plan and little likelihood of raising the funds to purchase their property.

Travers Report: museums are key to a creative economy

A new report, *Museums and Galleries in Britain: Economic, Social and Creative Impacts* by Tony Travers of the London School of Economics, finds that 'the UK's museums and galleries could, with greater capacity to expand and improve, allow this country to be a world leader in creativity and scholarship.'

The report, jointly commissioned by the National Museum Directors' Conference (NMDC) and the Museums, Libraries and Archives Council (MLA), analyses a number of Britain's leading museums and galleries in terms of visitor numbers, economic impacts, civic functions, and contributions to the country's creativity and educational performance.

It finds that Britain's museums and galleries are among the very best in the world: 'There is no other country in the world with such a powerful museum and gallery grouping within such a relatively small space'. Seven of the top ten visitor attractions in the UK are museums. The economic benefits of the UK's major museums and galleries are estimated to be £1.5 billion per annum taking into account turnover and visitor expenditure. New museums and galleries have contributed to the economic and social regeneration of industrial cities.

There are 3,000 volunteers and over 140,000 'friends' linked to museums in the study, making a major contribution to civic engagement. There are over 42 million visits each year to major museums and galleries: more than attendance at the Premiership League plus the whole of the rest of league football for 2004-05.

The Report notes that the kinds of people

visiting museums are changing. Regional museum visits by people from lower socio-economic groups and by black and minority ethnic groups increased by 15.2% and 60% respectively in 2002-04. It concludes that museums and galleries are fulfilling their original functions, while also acting as institutions of learning, mass tourist attractions and civic partners.

But the report also sounds a warning note. It says that up to a third of museum displays and facilities are in need of significant renovation and that capital expenditure has dropped sharply since 2001-02 as a percentage of total expenditure.

The amount spent on museum acquisitions is very small, in some years less than £20 million. Furthermore income has not been rising as fast as staff and other inflationary costs in the economy. The report concludes by pointing out that the availability of resources for investment in museums and galleries seems to be unrelated to the needs of the sector.

The report is available from the National Museum Directors' Conference website, which is: www.nationalmuseums.org.uk/pr_travers_report.html

Greater London Authority Heritage Diversity Task Force

The GLA has launched the Heritage Diversity Task Force (HDTF), which will work across London's cultural sector to embed cultural diversity in the capital's heritage infrastructure. The Task Force will build on the recommendations of the Mayor's Commission for African and Asian Heritage.

Chaired by Clara Arokiasamy, Deputy Director of Operations, Heritage Lottery Fund, the Task Force will focus on five key themes over the next two years, each to be explored by a sub committee comprised of practitioners, experts and policy makers. These sub committees will submit reports exploring best practice and addressing key issues to ensure quality service provision, access and representation, with an emphasis on making practical and workable recommendations. The key themes are: Diversifying collections; Governance, Equalities Strategy and Workforce Diversification; Sustaining BME heritage; Diversifying Audiences and Equitable Partnerships; and Heritage and Education.

LONDON PLAN ALTERATIONS DEPOSIT DRAFT SEPTEMBER 2006:**Extracts from REPRESENTATION BY THE LONDON FORUM OF AMENITY & CIVIC SOCIETIES**

The London Forum of Amenity and Civic Societies is an umbrella organisation for some 130 residents, tenants, conservation, civic and community organisations and other affiliated bodies including ourselves in the Greater London Region, with an aggregate membership of over 110,000. It also serves as the Civic Trust's regional federation for the GLA area and aims to represent its member groups at London-wide level. The following extract retains the original numbering: a full version is available on request.

KEY ISSUES include

3. Housing:
 - Will the planned additional housing provide an attractive quality of life?
 - Will the types of housing built match the requirements, particularly for family-sized units?
 - Will private and social rented housing in London be affordable and reduce homelessness?
 - Is there sufficient confidence that all the required infrastructure will be provided, including social facilities?
4. Town Centres:
 - Is there really a strategy for how the network should be developed?
 - Is too much being allowed in White City, Brent Cross, Stratford, etc to the detriment of other centres?
 - Are the retail floorspace projections too high, especially in CAZ and Inner West London?
 - Can a better distribution of shopping be achieved?
 - Are the outer London town centres being adequately supported and linked?
6. Maximising densities:
 - Is the London Plan encouraging inappropriately high densities for both residential and non-residential development despite the "sustainability" safeguards?
7. Heritage and conservation:

Do the London Plan policies protect them sufficiently?
8. London's waterways:

Have the alterations weakened the policies for the best use and protection of London's rivers and canals, control of future developments along them and the safeguarding and enhancement of their assets and facilities?
13. Transport:

Are the planned improvements in public transport sufficient to support the Plan's employment projections, bearing in mind their phasing and the uncertainties over funding?

 - Has the increase in passenger flows into and out of London been subject to full analysis & forecast?
 - Have the transport policies been reviewed and modified to a sufficient extent in view of the Mayor's new dominant theme of mitigating and adapting to climate change?
14. Climate change:
 - Are the Mayor's targets for

reducing greenhouse gas emissions soundly based?

- Has appropriate action been identified for achieving them, especially for existing building stock?
- Can there be sufficient confidence those action will be undertaken?

DETAILED COMMENTS**Preamble and Introduction**

1. My vision for London' by Ken Livingstone, Mayor of London, should include recognition of the River Thames and London's other waterways. The vision does not fully cover the value of the historic built environment for London as a World City. It must be protected and harm prevented to its setting and visual enjoyment. This need is not recognised in section one of the Plan: 'Positioning London'. Masterplanning of major development areas and consideration of applications referred to the Mayor should be covered by new policies to recognise that Richard Rogers in his Task Force report has called for compulsory character assessments of historic and landscape value.

2. The first of the Mayor's objectives (page xviii) should include the following key policy direction:

Achieve a sustainable pattern of development which takes advantage of existing centres, and improving public transport accessibility, by managing the spatial distribution of centres and other foci for trip-generating activities.

4. The Mayor's drive for economic development needs to be framed in policy terms that meet the requirements of the Government's Sustainable Development Strategy. It places more emphasis than does the Mayor on achieving a **sustainable economy** and requires that there should be principles which include "Living Within Environmental Limits" and "Ensuring a Strong, Healthy and Just Society". This is underpinned further by PPS1 para.13:- "Development plans should ensure that sustainable development is pursued in an integrated manner, in line with the principles for sustainable development set out in the UK Strategy. Regional planning bodies and local planning authorities

should ensure that development plans promote outcomes in which environmental, economic and social objectives are achieved together over time."

7. London Forum supports strongly the Mayor's policy direction for Objective 2, fifth bullet point, to

- Ensure that housing mix policies meet the needs of larger households.

but that aim is not well supported by policies for housing which should obtain the size of dwellings proposed in the Mayor's Supplementary Planning Guidance (SPG) for Housing. It should be taken into account that the Mayor's Housing Space Standards report of August 2006 concluded that "... there is an increasingly poor match between the needs of the population and the accommodation being provided in the private and housing association sectors. Specifically, London households require dwellings with more bedrooms than are currently being produced. This has implications for future overcrowding."

8. The GLA figures for bedrooms by housing density indicate a serious shortage of dwellings of three bedrooms and more. The percentage of two bedroom units in the density range 65 to 149 dph has been over 55%, with three bed units at only 10% and few dwellings with four or more bedrooms. This is a serious issue for the affordable housing supply where the too many units are small and space standards have been a problem. This has become a **key issue**.

12. In Objective 5, bullet point eight should be extended: "Further develop transport improvement plans for all areas of London **including reduction of overcrowding for those travelling.**"

Chapter 1: Population growth

13. Paragraph 1.40 refers to a working age population increase of 690,000 to 950,000 by 2026. **That range is too large to manage by the defined policies. This will need careful monitoring. It should be assessed further and the likelihood better defined.** There is no range given in paragraph 1.42 for the net growth of jobs over the same period, just the figure of

847,000. The wide population range has implications therefore for a lack of working resources to meet London's needs or unemployment for those who stay and a loss of skills. Insufficient numbers of workers in London would increase rail commuting into the capital and overload transport services and facilities at termini. This places critical emphasis upon the aims expressed in paragraph 1.18 of the London Plan and its proposed amendment for improving the proportion of Londoners in work. Those aims need to be better addressed in section 3B.5.

The environmental imperative

16. London Forum supports the Mayor's aspirations for climate change management expressed in paragraph 1.48 and 1.50. However, we believe that the Mayor should have improved upon the carbon dioxide emission targets in his existing Energy Strategy, not relaxed them with a new lower target for 2010, despite the reason given in paragraph 4.13 that "Government has accepted that its own targets for reductions will not be achieved."

Chapter 2 - The Broad Development Strategy

17. In Chapter 2, we support the new criterion in Policy 2A.1 for the planning and management of green networks. **It should be made clear here that the Blue Ribbon Network is London's largest area of open space and it is over seven times bigger in area than the definition of a Regional Park.** RPG3B/9B established in it paragraph 3.36 that the Thames is a "major linear open space of strategic importance. The River and its related open spaces form the backbone of London's open space framework". The Thames and its hinterland are London's greatest natural resources. The river is not just the water course, as river land includes the foreshore, banks and land immediately adjacent to them. Some sites that are brownfield now on the banks of London's rivers had to be built upon originally for river related purposes. There should be a presumption now in favour of retiring new building lines from the banks of rivers for restoring its green edges. New developments should be permeable to the existing communities for whom large buildings create a barrier to the rivers' open space. In those locations, **this should constrain the criterion in bullet point two for "Optimising the use of previously developed land"**. There should be a cross reference to Policy 4C.4 for the need to "identify potential opportunities alongside waterways for the creation and enhancement of open spaces." See our

waterways key issue.

18. The intentions expressed in paragraph 2.7i for renewing London's fabric are fully supported. However, that must be done in a way that protects the built heritage and respects the context of new developments.

Opportunity Areas

22. Policy 2A.2 for Opportunity Areas should have bullet points to achieve the requirements of para. 2.8 :-

- Plan the delivery of all required infrastructure elements for health, education, leisure, recreation, social and community services, open space and shopping
- Achieve mixed use and mixed housing types so that gross densities across a community sustain the net density of housing groups for spatial efficiency and sustainability

Areas for Regeneration

27. In Policy 2A.4 the time frame of 5 to 15 years has been proposed now to the aim that no-one should be seriously disadvantaged by where they live. Fifteen years is too long a period, considering (1) the Mayor's Objective 4, ("To promote social inclusion and tackle deprivation and discrimination"), (2) the current deprivation details in Chapter 1, and (3) Lord Rogers' Urban Task Force recommendations that all social housing estates should be transformed into mixed tenure communities by 2012. That requires local borough strategies for improvement over a shorter timescale than that set in paragraph 2.11 and it adds to the amount of strategy preparation work to be done. The spatial considerations for boroughs will need to utilise the guidance in the Mayor's SPG on Planning for Equality.

29. We support the additions to paragraph 2.13 for tackling the lack of access to local shops - this needs to be part of an overall strategy for a **better distribution of shopping**, especially convenience shopping to meet day-to-day needs, particularly in more deprived areas.

Town Centres

30. There is no overall strategy for the development of town centres. There is no indication as to how projected growth in retail floorspace should be distributed (other than broad sub-regional shares in Chapter 5), which centres should grow and how growth will be used to regenerate

certain types of centres and fill gaps in provision.

31. Policy 2A.5 for town centres should have a bullet point for resisting out-of-centre developments of the type that harm town centre ones or increase car usage, as required by new paragraph 2.16i. See also our paragraph above relating to Objective 3 for the potential impact on the strengthening of the West End and other shopping centres of the shopping facilities at White City, Stratford and Brent Cross. The support given for new dominant centres will reduce the prospects of regeneration of medium-sized town centres. This is one of our **key issues**. The Mayor should be supporting the development of a strong network of town centres providing Londoners with a wide range of choice within easy travelling distance of home.

Housing policies

35. Paragraph 3.7 indicates that the Plan assumes household representative rates are stable over the next 20 years. That will need further examination to see if the increase in the number of people living alone or in smaller households is offset by the increase in average family size and the percentage of people who will share accommodation. An issue has been the lack of provision of new family-sized dwellings. The Mayor's SPG has addressed this but the percentages in that guidance for homes of different sizes has not been achieved in schemes gaining the Mayor's full support. The requirements for dwellings of various mixes of bedroom numbers needs to be reflected in policy.

36. Paragraph 3.8 states that "This Plan assumes that the existing backlog in housing need should be met over a ten year period." The Inspectors' report after the June 2006 Examination of the Early Alterations included their concern in their paragraph 0.4 about the fact that many of the extant permissions will not deliver the 50% affordable and social housing required by the Plan. Also that ". . . we do share concerns about the delivery of affordable housing in the east on the scale envisaged and the implications associated with this." (Their paragraph 2.26). It should be noted that the percentage of affordable housing delivered has been reducing and is now below 30%. Paragraph 3.33 has been modified in the alterations to raise the requirement for affordable homes to 65%. **The London Forum does not understand how new policies or funding mechanisms will cause the percentage of affordable homes to double.** Paragraph 3.36 merely states that a portfolio of policies will be

necessary. These should be decided upon and detailed in advance of the Examination in Public of these alterations.

37. Policy 3A.2 should have additional factors in its second bullet point for the identification of new sources of housing supply, including provision for homelessness and overcrowding. To be consistent with the Mayor's strong focus upon climate change, the assessment criteria applied in his Housing Capacity Study will be valid in considering any housing site already identified, and others that may be assembled, to assist in site capacity finalisation. The criteria were for reduced capacities in cases of air pollution, flood risk, noise pollution, pylons, ownership, infrastructure, environmental setting and contamination. 'Environmental setting' is a term that will need clarification in section 3A of the London Plan if any identified sites are in sensitive locations. Additional criteria should be consideration of surrounding building heights and of the land needed for provision of infrastructure.

Maximising the potential of sites

39. The policy to maximise the use of any site will continue to result in development which is not sustainable, appropriate or supportable by local infrastructure and services. Some of the Mayor's Stage 1 reports on planning applications referred to him have not sought density reductions to meet other policies of the London Plan. **We propose rewording as "by ensuring that all housing schemes are developed at densities within the appropriate density range indicated by the density matrix in Table 3A.2. Densities below or above the relevant range for a site will need clear justification for departing from this.**

40. This will also mean giving increased status to Table 3A.2 in relation to:

- preparation of local development frameworks by the boroughs;
- development control decisions

That Table is not (and should not be) just "indicative" and then totally disregarded.

46. Paragraph 3.15vi clarifies that only transport capacity increases should allow housing densities to be increased. It should be made clear that the presumption should be that the density of a scheme should be **within** the appropriate density range, unless there are overriding reasons for deciding otherwise. We would like to see considerations given in this paragraph and related policy to 'townscape', so that at the higher end of the density range there should be sensitivity to the height and mass

of surrounding buildings.

Affordable housing

52. We support the low carbon emissions design aims in paragraph 3.25i.

53. In Policies 3A.6 to 3A.9 we support the requirements for affordable housing and we emphasise that the targets, types and standards must be met. The achievement of low cost homes in the capital has been inadequate, as identified by the Inspectors of the Early Alterations and significant attention must be given to addressing the backlog. **These policies will need to be considered again with regard to the content of PPS3.**

54. We support the new requirement in paragraph 3.44ii that, for affordable housing, "off-site provision should only be considered where a site is identified and delivery is certain." It should be re-worded to "off-site provision should be considered only where a site is identified and delivery is certain." **On-site provision is considered by us to be required to achieve sustainable communities.**

55. London Forum welcomes the content of new Policy 3A.8i and its additional paragraphs, particularly:-

- lower thresholds where justified (paragraph 3.46);
- Mixed-use development (paragraph 3.51);
- Comprehensive assessments of the need for care homes, etc (paragraph 3.54i)

56. Paragraph 3.46i should make clear that capacity considerations should include the local townscape and the type of buildings nearby. There could be a lack of local infrastructure facilities that could require additional ones to be provided on part of any site.

Tourism industry

64. Policy 3B.10 for tourism should give recognition to the value of London's historic built environment and the need to protect and enhance it, including the access and views to and from significant buildings and structures. Particular emphasis should be placed on the sensitivity of World Heritage Sites to support the policies in section 4B of the London Plan and to offset the concerns expressed by UNESCO about the harm being caused by development to the Tower of London and other UK WHS locations. UNESCO's UK Culture Committee is reported to have said: 'The London Plan policies to protect the World

Heritage property and its environment do not seem to be applied effectively' and 'Once you lose the views you start to lose the intrinsic value of the buildings'. We appreciate that a sentence acknowledging this problem is to be added to the end of paragraph 4.57 but it should have more prominence in Policy 4B.13, for which the Mayor has to finalise the draft Westminster World Heritage Site Management Plan. Consultation ended in January '05.

Chapter 3C Connecting London - improving travel in London

Closer integration of transport and spatial development

65. We welcome the addition to Policy 3C.1 for improving public transport for 'parts of suburban London in which improved access is needed'. Additional orbital transport facilities will be important to provide improved links to town centres and bus services to connect with interchange points on the national rail services in the London area, on Crossrail and on the planned transit schemes.

66. London Forum supports the addition to Policy 3C.1 for public realm improvements at interchange. We look forward to consultation on each scheme.

Enhancing national, international and regional transport links

68. We are concerned that a reference to the ORBIT study of the planning and transport issues around London's periphery (former paragraph 3.172) has been deleted and there is now no recognition in the Plan of the severe problems likely to arise from increases in road traffic in the M25 ring, beyond a routine reference in general terms (3.171) to partnership with the South East and East of England planning and transport authorities.

Airports

69. We strongly support policy 3C.6 insofar as it opposes additional runway capacity at Heathrow. It should be made clear that this opposition extends to the increased runway capacity that would be made available by simultaneous use of the north and south runways and that the **Mayor would oppose** the ending of alternation of those runways. Any increase in the landings and take-offs at Heathrow, however achieved, would increase carbon dioxide emissions, air pollution, noise and road congestion in contravention of the Mayor's climate change policies and EC standards. As the Plan recognises (3.179),

the Channel Tunnel Rail Link service from 2007 at St Pancras station will provide an alternative to air travel. The number of flights using Heathrow could be cut by around 100,000 a year if there were no flights to and from the destinations where there is already a good rail alternative, according to research by campaign group HACAN ClearSkies. This gives further support to the Mayor's policy 3C.6.

70. We welcome the recognition in the 3rd paragraph of policy 3C.6 of the importance of issues about surface travel to and from airports, and believe this part of the policy should be strengthened. We propose improvements as follows. The Mayor should also express his support here for the Airtrack project. It should be made clear that (because of the direct impacts on London) this part of the policy covers promotion of sustainable modes of travel to and from other airports serving London, as well as Heathrow; at the moment Gatwick and Stansted are dealt with separately (3.175), and in their case additional travel by road is put on a par with additional travel by public transport.

Improving strategic rail services

71. London Forum is concerned that policy 3C.8 seeks to facilitate, and therefore encourage, long-distance commuting into London by rail. We develop this point in the following paragraphs.

Better public transport in London

72. The subject of the next part of section 3C of the Plan is transport 'in London'. In addition to journeys within London, it is noted (3.181) that over 700,000 people commute daily from the surrounding regions into London and nearly 275,000 people commute the other way, from London into the surrounding regions. Both numbers have been increasing. It is disturbing that the initial policy document produced by TfL for the review of the Transport Strategy (Transport 2025) focuses exclusively on projected changes in population and employment within London and does not acknowledge the importance of these cross-boundary flows. No projections seem to have been made to show what the future trends might be and these should be available for the examination of these changes.

73. The London Forum is very concerned that the main effect in practice of many of the biggest projects listed as prospective improvements in public transport, such as Crossrail and increases in the capacity of the National Rail network,

will be to benefit people making relatively long journeys into central London and encourage more and more people to commute over longer and longer distances, many of them from outside London. The emphasis the Plan places on use of the Channel Tunnel Rail Link for commuting (3.179-3.180) increases our concern.

74. The current scale of commuting from outside London, and still more any prospect of a substantial increase in such commuting, raise some doubts over the assumptions made in the Plan about housing requirements, and work against the aim of providing employment for London's own increased population. Although commuting into central London is overwhelmingly by public transport, the significant increase likely to occur in the distances travelled will contribute to the growth in carbon dioxide emissions and cannot be regarded as consistent with environmental sustainability.

75. There seems to be little information about commuting from London into the surrounding regions, and about the modes used. It is likely that a high proportion of such journeys are made by car, particularly out of the 'Western Wedge', and that the same is true of commuting journeys into outer London from the surrounding regions. This highlights the Plan's failure to grapple with the transport issues facing London as a whole.

76. We object to the lack of proposals by TfL for addressing the transport challenges faced outside the central area by the rest of London. Over three-quarters of journeys in London do not involve central London. In contrast to the prominence given to projects serving central London commuters, projects which would primarily benefit journeys within London have been given lower priority, and downplayed in the wording now proposed. These are the projects which would benefit deprived areas and populations by improving access to employment, and thereby contribute to achievement of the Mayor's objective 4. Because of limitations on the capacity of public transport systems, there are inevitable trade offs in practice between the quality of long-distance rail services and the quality of rail services within London. Our concerns are not removed, therefore, by a bland proviso about 'safeguarding services within London' (at the end of policy 3C.8).

Better public transport in London

77. Although the Draft Further Alterations are optimistic in describing

planned improvements in London's public transport (3.182-3.184), many of the projects are still subject to considerable uncertainty. Even on the basis of the original London Plan there was considerable doubt whether improvements in public transport would be sufficient to cope with London's projected growth. The Draft Further Alterations retain the target of an increase of 'up to 50 percent' in public transport capacity (policy 3C.9) but now apply it to a longer period, to 2025/26 rather than 2020. Clarification is sought on whether the estimated increases in public transport capacity relate solely to travel within London, and if not what proportion of them does. It is admitted that there are particular uncertainties about the completion dates of schemes scheduled for the later phases of the plan period (3.184) and there is now a commitment to develop additional projects for those phases (3.185).

Phasing of transport and improvements

80. We seek expansion of paragraph 3.182 on specific objectives for public transport improvements to acknowledge that they should include promoting a polycentric pattern of development within London, rather than perpetuating and intensifying the historical emphasis on bringing people into central London, and achieving a modal shift in travel by the existing population (not merely making public transport more attractive or, as in the Mayor's proposed amendment, meeting 'increased demand for travel arising from additional population and activity').

81. There must be considerable doubt whether, under present arrangements, the Mayor has the ability to fulfill the expectations raised by policy 3C.10 (Phasing of transport). The Draft Further Alterations retain (3.186) the comment that 'Crossrail is critical to supporting the growth of the financial and business services sector in central London and in the Isle of Dogs'. It is now more than four years since that statement was written but there is no date for the completion of Crossrail. The Mayor should indicate what parts of the development of London would be inhibited or have to be prevented if Crossrail services are not available in time.

82. Similar considerations apply to the lack of commitment to Crossrail 2 and the dependencies on its availability summarised in 3.188. Amendments to policy 3C.11 show that both Crossrail 2 and the Thameslink programme have slipped considerably. There is also an apparent dependency on an 'essential' 40% increase

in National Rail services for the capital (3.189).

83. We are **suspicious**, given the importance of branding and marketing in promoting public transport, about the motivation for dropping the concept of London Metro from policy 3C.11 (New cross-London links within an enhanced London National Rail network), although the term 'regional metro' has been retained in relation to central London and Opportunity Areas in East London (3.166).

84. We **regret** that commitment to completion of an orbital rail service now seems to have been qualified and the concept of Orbital dropped (3.190). There should be a reference in the Plan to extension of Oystercard to the National Rail network, which we regard as fundamental to promoting use of the public transport system.

Improved Underground and DLR

85. It is helpful to have an enumeration of the planned improvements on the Underground (3.191) and the Docklands Light Railway (3.192). In the case of the Underground, however, **the capacity increases listed are at risk** due to the continued underperformance of the PPP consortium Metronet in renewing and maintaining their part of the system, as reported by the Mayor in his Press conferences. Targets have not been met for the last three years and the programme may not, therefore, achieve the reliability and capacity of service that is necessary by the dates indicated. Responses to this situation by the Government, and the need for other investments as above, will have to be taken into account in examining the viability of London's spatial development strategy.

Enhanced bus priority, and tram and bus transit schemes

86. **The Plan should indicate what policy will be followed** in choosing between the alternative options promoted by policy 3C.13 of bus priority (which also features in policy 3C.19 as a method for overcoming the effects of congestion), transit systems and trams. The various forms of transit system need to be defined, along with the terms 'bus-based transit' (3.194) and 'busway transit' (policy 3C.13).

Reducing congestion and making better use of London's streets

90. We **criticise** the targets in policy 3C.16 (tackling congestion and reducing traffic) as not sufficiently ambitious in

relation to areas outside central London. The targets for the area subject to congestion charging and for the rest of inner London should be reviewed in the light of an assessment of the effects of implementing the Western Extension. The strategies referred to in the first inserted bullet will presumably be based on the Travel Demand Management approach which TfL is promoting; this policy should specify that the purpose of such strategies will include encouraging modal shift, as well as changing the times of journeys. We endorse the second inserted bullet and the criteria proposed for the application to London of a national road user pricing scheme.

91. In policy 3C.17 (Allocation of street space) we **support** the addition of references to servicing and to corridor management.

92. London Forum **seeks policies to improve safety on London's roads**. We would like to see the Plan include a clear statement of support for Home Zones (3.199) and for their designation on a more general basis in London, in that way minimising problems caused by diversion of traffic onto boundary routes. There should also be a clear statement on the desirability of improving the public realm by dispensing with obtrusive and unnecessary signage and street furniture, whether this is achieved through local area transport treatments or in other ways. That includes removing existing road humps for reducing traffic speeds which we believe should be replaced by speed detection systems in all roads that record and time the movement of every vehicle from the entry to the exit of road sections for penalty charges to be issued. Consideration needs to be given to the **speed limits** that should be applied to different types of roads as many 20mph limits are in place but are not well observed.

Improving conditions for buses

93. We **support strongly** the reference in the last bullet of policy 3C.19 to ensuring 'bus layover and turning areas, driver facilities, bus stations and garages' are available where needed; there have been problems over this in some parts of London, which community groups have taken up with TfL. This places emphasis on Policy 3C.4 for the allocation by boroughs of land for transport. For spatial planning, it would be useful to have an **up-to-date statement from TfL** of the general requirements in this respect.

Improving conditions for walking and cycling

94. We **welcome** the proposed additions to policy 3C.20 (conditions for walking). Mention should be made also of the CLP/TfL project on London's walking legibility, launched in at the New London Architecture Gallery in October 2006; and the need for clearer signing of walking routes and their inclusion on maps.

95. Paragraph 3.204 on provision for walkers and cyclists in major new developments, and in planning briefs and master plans, **should be elevated into a policy**.

96. The inclusion of cycle parking in policy 3C.22 (Parking strategy) is **welcome**. A further bullet should be **added** to this policy to give the Mayor's support to car-free developments (3.206) in appropriate locations.

Improving freight movements and the distribution of goods and services

97. We **strongly support** the insertion in policy 3C.24 of references to development of rail routes to relieve London of through freight (to complement the existing reference in policy 3C.5) and to minimising night disturbance from freight movement. We **propose that** at the end of the 1st bullet reference should be made also to the Freight Quality Partnerships which are now operating with community participation. The 3rd bullet should be **amended** so that it covers the transfer of freight from rail and water, as well as to rail and water. At the end of the 4th bullet the following words should be **inserted**: 'designed to avoid an intrusive impact on the public realm'. A further bullet should be **added** to this policy to express the Mayor's support for consolidation centres (3.215i).

98. The reference to 'vehicles with lower environmental impact' (3.215) should be **expanded** to indicate that, as well as supporting use of lorries fuelled by low carbon technologies or with lower emissions of other pollutants, the Mayor supports the use of smaller lorries for deliveries within densely developed parts of London (the 'London lorry' concept), in order to minimise intrusive impacts on the public realm and the life of the community.

101. We note the addition of a paragraph on air freight (3.217i); we **propose** that the words 'including sleep disturbance for residents, and ensure it meets its full environmental and external costs' be inserted at the end of that paragraph.

Chapter 4A - Climate Change

120. In paragraph 4.1v it is stated that "The Mayor recognises that the London Plan can exercise limited influence upon behaviour and upon the use of existing buildings". Those are very important aspects to tackle in reducing CO2 emissions and further action and financial support will be expected from Government to assist in meeting the Mayor's climate change targets and the achievement of Policy 4A.15.

121. The amendment to paragraph 4.1 for the disposal of waste "at the nearest appropriate installation" must result in cessation of the activities of those London boroughs that export up to 20% of their waste to Far East countries for 'processing'. This is contrary to the new bullet points four and six of Policy 4A.1 in the latest alterations. Spatial policies for more land in appropriate places for dealing with waste, other than by incineration and related methods, should be given high priority.

122. The Mayor's targets for mitigating climate change in his new Policy 4A.2ii do not seem to be sufficiently stringent. He has said that he would review all policies following publication at the end of October 2006 of the Stern report on climate change. He has indicated that he will set targets and sector by sector measures aimed at cutting the capital's emissions every year. It is necessary to have annual targets available before these alterations are examined and should relate to the Government's intentions for the Climate Change Bill.

123. London Forum supports the improvements to Policies 4A.2i for sustainable design and construction, to the policies in section 4A.5, Policy 4A.7 for renewable energy and Policy 4A.8 for energy assessment.

124. We welcome the statement which has now been added in Policy 4A.1 (page 220) that the Mayor will support the production of energy from waste only where waste cannot be recycled. It must be made clear that the incineration of paper and plastics that could be recycled **should not be allowed**. At present that is only an aim on page 221.

125. The London Forum objects to the lack of policies that will ensure safeguarding of sites along London's canal network, as achieved on the Thames, for waste transfer, processing and management. This need was in our response to the Mayor's Statement of Intent for revision of the London Plan. The Inspectors for the Early

Alterations wrote in their paragraph 9.47: "More emphasis should be given in policy to use of the Thames and the canal system."

Chapter 4B - Designs on London

Design principles for a compact city

140. Policy 4B.1 continues to be worded to "maximise the potential of sites". London Forum expects there to be words more suitable for Sustainable Residential Quality for 'making the best use of sites within the ranges for housing density set in Table 3A.2'. We propose changing "maximise" to "achieve more intensive use of" or "optimise" - a consequential change following from our responses above on housing. It also relates to paragraph 4.37 and the new paragraph 4.37i.

141. As we wrote in our response to the Mayor's Statement of Intent for the review of the London Plan: "There is a need for further guidance on the density of commercial development and its relationship to public transport accessibility and capacity . . . "maximise" suggests no upper limits. Policies and supporting text need to be amended to reflect this." These should be developed from the guidance and restraints in paragraph 4.44. **In that paragraph we propose amendments as follows:-** change in line one "plot ratios should be maximised" to "Boroughs should achieve more intensive use of land by adopting higher plot ratios in town centres". Lines 10/11 should be altered to: "The ability to achieve more intensive use on any site or area will...."

142. We welcome the addition of the word 'history' to the aspects that new developments should respect but, as in paragraph 25, there is a need for a cross reference in Policy 4B.1 to Policies 4B.10 and 11 for criteria which they add for protection and enhancement of London's built heritage and historic assets.

Promoting world-class architecture and design

143. Policy 4B.2 for architecture and design should be amended to support the aims for mixed type of housing and the creation of compact, walkable communities fully supported by infrastructure and facilities. See our comments for Policy 2A.2 to achieve this. The Inspectors of the Early Alterations wrote in their report's paragraph 3.30: "The Panel believes that in a circumstance where greater density is to be required as a matter of course then innovation in design and layout will be a necessary feature to secure the numbers of

dwelling units required and to meet the new sustainability obligations that are emerging from Government and contained in the Draft Further Alterations." That relates to London Plan paragraph 4.37 for intensive development. **Policy 4B.2 must also seek to promote improvements to London's public realm, which now seems to have been deleted as an aim.**

Historic conservation-led regeneration

156. The changes to Policy 4B.12 are supported for respecting, enhancing and (*particularly*) making use of waterways and waterside heritage.

157. We object to the loss of detail in the new paragraph 4.62i. It appears to incorporate only some of the text of paragraph 4.94 from the original Chapter 4C. **Previous words should be restored.** They are the reminders and planning constraints from paragraph 4.94 that "London's four World Heritage Sites are found adjacent to the Thames and there are numerous Conservation Areas and listed buildings adjacent to all waterways." That will be significant in considering developments in the CAZ.

158. London Forum objects to the alteration that has removed a topic for Conservation Areas from the London Plan with its own Policy 4C.11 and subsequent paragraphs, of which 4.94 (see 100.) was one. An attempt has been made to convert policy to text for conservation areas and to add it to the end of the section of the London Plan, Policy 4B.14, which is for Archaeology. That is unsuitable. Section 4B should have a heading for Conservation Areas which should incorporate Policy 4C.11, paragraphs 4.94 and 4.95 and other text appropriate to conservation areas, other than those by waterways, for conformance with PPG15.

London view protection framework

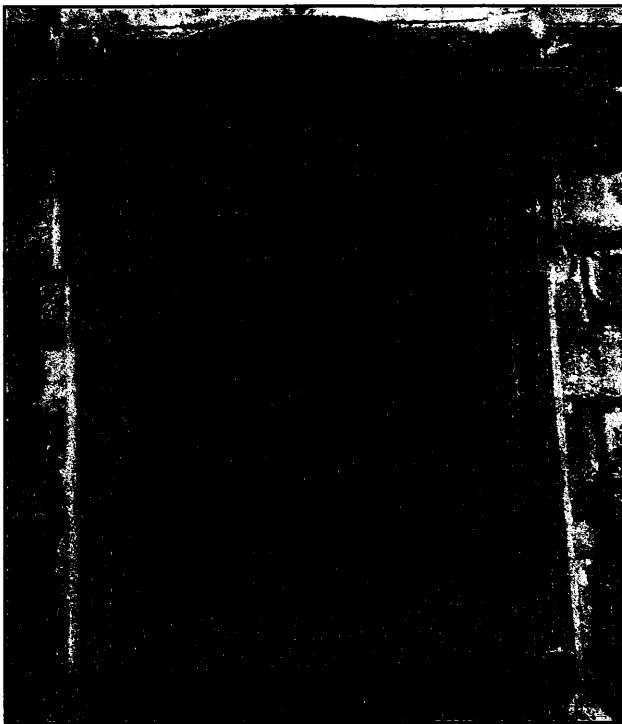
159. For Policy 4B.15 for the views protection framework, we object to the way views along and across the Thames upstream of Lambeth Bridge are completely discounted in Table 4B.2. The views are covered extensively for their protection in the Thames Strategies for Hampton to Kew and for Kew to Chelsea which are adopted by the London Plan as policy guidance.

160. Densities of developments are significant aspects of building design. If the housing density policies and supporting text are to be moved to section 3A, then there should be more cross-references to them in policies and paragraphs relating to design.

Samuel Phelps 1804-1878

In this issue, we continue our series on the Blue Plaques of Islington, compiled by our vice-chairman Alan Turner. As the photograph shows, this plaque is less obviously one of the series: installed by the LCC in 1911 its style predates the more familiar round plaques.

In Islington's long connection with the theatre, perhaps the first example was James Burbage's wooden theatre in Shoreditch in 1576. Currently Sadler's Wells, The Almeida and The King's Head are justly famous, supported by a number of smaller theatres such as The Old Red Lion, The Rosemary Branch, The Hen and Chickens and others. In the past Collins' Music Hall provided popular entertainment to large audiences, although it never became quite "respectable". On the other hand Sadler's Wells, became very respectable indeed and for this it owes a great deal to one man - Samuel Phelps, who lived at 8 Canonbury Square from 1844 to 1867.



Born in Devonport, he worked for various newspapers until he took a job in a York theatre at 18 shillings a week. He rapidly became a leading actor and made his first appearance in London in 1837, as Shylock at the Haymarket, later working at Covent Garden and Drury Lane. In 1844 he became a lessee of Sadler's Wells in partnership with Thomas L Greenwood and Mrs Mary Warner. In those days it was described as "an obscure theatre in the north of London" and was clearly very different from the elegant house we know today. Apparently Phelps opened to "a hideous medley of fights, foul language, cat calls, shrieks, yells, oaths, blasphemy, obscenity, apples, oranges, nuts, biscuits, ginger beer, porter and pipes". As if that were not enough, the entrance was surrounded by fish fryers, oyster stalls and showmen. However, Phelps was a very determined character and over a period of twenty years he raised the theatre to an important position, staging no less than thirty four Shakespeare plays.

The general view seems to be that Samuel Phelps was not a great actor, but he was certainly a capable one who excelled in both tragic roles and comedy. His success may be measured by the fact that there are three portraits of him in the National Portrait Gallery by Alfred Bryan and Harry Furniss.

Mary Cosh in her recent book *The History of Islington* [pp 271-3], has written more extensively about him and this to say: "Altogether, Phelps's transformation of the deteriorating theatre was enough to create a new audience of devotees." It can fairly be claimed that he was one of the people who helped to make Islington a vital part of the metropolis, rather than just another part of North London. AT

Society publications

Twentieth Century Buildings in Islington, by Alec Forshaw, £14.99, ISBN 0-9541490-0-9

The Story of Day Flats in and around Islington, by Andrew Bosi, £5, ISBN 0-9541490-1-7

An architect in Islington, by Harley Sherlock, £14.99, ISBN 9-78-0-9541490-2-4

[all of the Society's publications are available from the Society at 35, Britannia Row, London, N.1]

Books from our President and Vice-President

Suicide of the West, by Richard Koch & Chris Smith, £14.99 and available on Amazon, ISBN 0-8264 9023-9.

A History of Islington, by Mary Cosh, published by Historical Publications at £18.95, ISBN 0-948667-974

The Decline and rise of London Buses

In this final article of the series, Andrew Bosi turns to the infrastructure on the street.

Changes in bus design also affect the need for bus stops. As London Travelwatch has pointed out, stops in Oxford Street are few and far between. The frequent stops at traffic lights mean that this has not mattered where open-backed buses are operated: a precursor of their non-use has to be more stops. Moreover, the stops have to be returned to their 1930s siting: close to junctions, at the point of convenience to bus users rather than as far away as possible to facilitate the needs of the private car user with which the bus is in competition. The best technology in the world is only any good if it is accompanied by proper maintenance and the ability to put it fully into effect. There have been incidents of multiple failure of the low floor bus ramp, taking successive buses out of service to the particular distress of the wheelchair user. If the bus cannot pull in to the kerb, either because parking enforcement is inadequate, or a higher priority is placed on maintaining the schedule, the provision of the ramp and the low floor is of no benefit.

However, while bus stops have become more inaccessible in general, there have been one or two major schemes bringing significant improvement. There is no doubt that the plethora of one way schemes introduced in the 1960s caused big problems for bus users wanting to travel against the flow. Fortunately, a gyratory scheme at the Angel Islington lasted just three hours. In some cases there were contra-flow bus lanes. The stripping away of the gyratory at Shoreditch has transformed it for the better as a place to board a bus. The high cost though seems to have curtailed further schemes. It is easier to board at Vauxhall, but the full scheme originally envisaged has not happened so that the bus journey times are needlessly long. However, there are plans to restore the contra-flow bus route across Piccadilly Circus, and development led opportunities may arise to deal with the four gyratories in Islington: Archway, Highbury Corner, King's Cross, and even the mammoth Holloway Prison to Finsbury Park.

The information revolution began with Countdown more than fifteen years ago. Using

sensors placed along the route, Countdown records the position of the bus as it passes and estimates the time to be taken from the current position to your bus stop based on the last three buses to have made that journey. After the system had been introduced, the algorithm was adjusted at my suggestion to reflect the fact that journey times lengthen as the peak period starts and contract as it comes to an end. This information gives confidence in the service which did not previously exist, and enables one to wait for a more suitable service rather than taking the first one that goes anywhere near: or where routes run from different stops (as at The Angel or Aldwych) to opt for the stop served by the first bus to arrive.

The system cannot be perfect and one obvious weakness is where a bus overtakes another high sided vehicle (usually another bus) as it passes the sensor, or the sensor is obscured by a parked vehicle. Driver changes mid-route caused chaos to Countdown on Holloway Road (an anti-social practice which many bus operators manage to avoid). A new system, based on radio control, has been tested on one route and is likely to replace Countdown in the next five years.

A fair allocation of road space may be more difficult to resolve. The one-person private car is not sustainable. The pedal cycle on the other hand is a sustainable form of transport and should be encouraged. It is neither safe nor satisfactory to have road space shared by cyclists and articulated buses. Use of the latter should be confined to roads where there are segregated cycle lanes. Road space is at a premium, and the siting of bus stands has on occasion raised major hostility between local residents and Transport for London. Where space is at a premium, there is no justification for replacing double-deck vehicles with single-deckers, particularly articulated single deckers which take a disproportionate amount of the carriageway. Harry Potter has a better understanding of land values than Transport for London! It is reassuring that the Mayor who supports more use of multi-decker buildings has registered the inconsistency in supporting low rise buses, and is thinking out how to redress the balance.

From the Society

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Future events

We are hoping to announce details of our Annual Dinner, our Annual Church Crawl our Annual General Meeting, and our Annual pub crawl in celebration of the life of Bill Manley. Watch out for further announcements.

Officers of the Society continue to meet for an informal chat in the Marquess Tavern, at 9 p.m. on the first Tuesday of each month. The Marquess is at the north end of Canonbury Street. All members are welcome to join us.

Conservation Award 2007

Hardly has the second Architecture & Conservation award been presented than it is time to take nominations for the third. The Award was due to be presented to P & O on February 15th as we went to press.

Nominations are now sought for the most distinguished new building or refurbishment completed in 2006. Please send them to our vice-

chairman, contact details opposite.

What else do we do

- we support conservation planning work to preserve the borough's historic fabric and individual buildings of distinction
- we campaign for a high standard of design in new buildings
- we encourage best practice through awards for good architecture in new or refurbished buildings
- we organise a varied programme of events including talks, walks and site visits
- we campaign for better public transport and for priority for people travelling on foot or by bike
- we produce publications that celebrate Islington's architectural history and its social and cultural diversity
- we publish neighbourhood walking trails to foster exploration awareness and pride of place
- we build links between residents officials and councillors
- we publish a regular newsletter
- we send representatives to advise Council groups dealing with development, the environment and transport
- we are represented on the London Forum of Civic & Amenity Societies, which takes up cross-borough issues of concern and is a member of the Civic Trust

Future format of the newsletter

The committee has decided to persevere with the A4 format, despite the extra cost. One member suggested that print size could be reduced, and we have experimented with a smaller print section. As always, comments welcome.

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