



Registered charity number: 259843

## New London Plan: Comments from the Blackheath Society

### General comments

- It is regrettable that the new plan document fails to highlight detailed differences from previous plans. This makes it hard to evaluate many of the proposals contained within it, including some which mark quite radical changes of emphasis.
- As the document makes clear, pressures on land use and housing will intensify in the foreseeable future. This makes the challenge of sustainable, sensitive development all the more acute. Developers and local authorities need to be more transparent than at present about matters such as viability assessments and assumptions about infrastructure provision which often drive development decisions.
- It is important in this context that the many references in the draft plan to 'optimizing' land use are not taken in practice to be automatically synonymous with 'intensifying' land use.
- There is, in comparison with the 2016 Plan, a general weakening of the protections afforded to heritage assets. It would be a huge mistake to allow development pressures to overwhelm heritage assets and spaces which give London much of its value.

### Chapter 1

**1.0.5:** The assertion that London's population will grow to 10.8 million by 2041 is clearly central to the plan. The basis for this figure is unclear and unexplained. There is no discussion of whether such an increase is judged to be inevitable and whether it is viewed as desirable and/or manageable. The targets set out in table 4.1 presumably stem from these population projections but it is not clear whether these are intended to be 'neutral' with respect to the projected population growth (that is to broadly accommodate it) or whether they are intended to encourage population growth on this scale or discourage it (for example by encouraging development of other regions). The London Plan will be a driver of population growth and not merely a response to it. More analysis and explanation of this issue would be warranted.

### Chapter 2

**Policy SD1 Opportunity areas:** Lewisham (within which part of Blackheath lies) is designated as an Opportunity Area and the town centre has already been subjected to intensive development. While this has taken place within the context of a local Lewisham plan much of it appears in practice to have been largely uncoordinated and developer-led,

particularly where significant amendments to developments have been proposed and agreed. The result seems likely to be a poorly planned town centre with, in practice, little coordinated oversight of design, the public realm, infrastructure and social amenity.

To avoid such problems in future, Policy SD1 should include a requirement for local authorities to draw up comprehensive and credible master plans for the development of such areas. These would provide a detailed and coherent vision of what large scale developments (rather than individual projects) will entail, based on realistic projections of deliverable social and transport infrastructure. Projections based on aspirations or unwarranted assumptions should not be accepted and amendments to agreed proposals closely scrutinised to ensure they remain consistent with the original plan.

**2.1.17:** This paragraph is highly aspirational. The outcomes projected are desirable but by no means inevitable unless the local authority develops a much more coherent approach to overall planning as set out above.

**Policy SD6 Town centres:** We support the thrust of this policy. It requires however that local authorities show proper regard for the mixed character of town centres, particularly when considering changes of use. There should be no blanket presumption in favour of changes of use from, for example, office space to residential or eating/drinking establishments but such changes should be based on a careful evaluation of needs and existing circumstances.

## Chapter 3

**Policy D1 London's form and characteristics:** Whilst we agree with the thrust of this policy, the repeated references to 'optimising' land use should not be seen as synonymous with increasing density ('optimising' should not equate to 'maximising'). Ambiguity of this kind is not helpful and will reduce rather than increase clarity in the planning environment. Whilst there may be a case for increasing density of development in a number of instances, there should be a requirement for this case to be made in the light of local circumstances.

**Policy D2 Delivering good design:** Here too, whilst we agree with the thrust of this policy, 'optimised' should not be read as synonymous with 'maximised'

**Policy D4 Housing quality and standards:** The detailed specifications included in this section, including table 3.1 are welcome. It is very regrettable however that no comparison is provided with previous standards. Notwithstanding the pressures on housing in London, it is not clear why earlier minimum requirements should be relaxed, at least without strong justification. It is also unclear why the emphasis here and throughout the section is exclusively on new building with very little mention of re-purposing existing structures to residential use.

**3.4.2:** The suggestion that local authorities should resist applications for dwellings with floor areas significantly above the minima specified is surprising. Even acknowledging the existing housing pressures, this appears heavy handed and inappropriate.



**Policy D6 Optimising housing density:** Here too there is a very strong sense (for example in paragraph A) that ‘optimisation’ in fact means ‘maximisation’. We believe that would be an inappropriate direction for policy but if it what is meant, the language should clearly reflect that intention. The logic of paragraph B looks completely wrong. We are seeing in Lewisham over-development predicated on optimistic assumptions/forecasts regarding infrastructure. The implication of paragraph B (and para 3.6.3) is that developers and authorities should identify the ‘optimum’ scale of development then work towards overcoming infrastructure constraints. In fact, development should occur only on a scale commensurate either with infrastructure capacity that exists already or where there is a high level of certainty that it will be delivered.

**Policy D7 Public realm:** We support the aspirations underlying this policy. In reality however we are threatened in Lewisham with an erosion of the existing public realm/open space through excessive development, including clusters of excessively tall buildings. The aspirations reflected in this policy need to be given statutory teeth to enable encroachment on the existing public realm and inadequate attention to this in future development to be actively challenged.

**Policy D8 Tall buildings:** We agree that well designed and sensitively located tall buildings have a role to play. This must not however be at the cost of the public realm which can often be eroded either quantitatively in terms of development encroaching on existing levels, or qualitatively as a result of the overbearing nature of new buildings.

**Policy D8:** We also believe there should be much greater accountability and transparency on the part of developers seeking to increase density or height of developments. Currently, permission may be given for this on the basis of non-disclosed viability and other assessments. These should be made much more transparent to permit proper challenge. There should be a London-wide map maintained by GLA (not boroughs) setting out where tall buildings (in excess of 15 storeys) are allowable, specifying height and numbers permitted.

**Policy D9 Basement developments:** We welcome the discussion of basements which have become a major, and problematic, issue in many London boroughs. The policy proposed does not go far enough however. Boroughs should be required to develop policies in respect of all basement developments, not merely large scale significant ones. Even relatively modest basement developments beneath single dwellings can have serious implications for existing structures and neighbours’ amenity particularly on sloping sites, where the ground contains clay or where there are groundwater complications. Boroughs should have policies to address these matters. Where one or more of these circumstances apply, basement developments should be permitted only if a basement impact assessment concludes that there is no likelihood of unacceptable structural damage to the host or neighbouring buildings.

## Chapter 4

**Policy H2 Small sites:** The wording of Section E of Policy H2 creates a presumption of development on small sites unless ‘it can be demonstrated that the development would



give rise to an unacceptable level of harm to residential privacy, designated heritage assets.... Etc'. This tilts the balance too far in favour of the presumption of development.

The wording of Policy H2 in general pays insufficient attention to the context of small sites, particularly those in conservation areas. There needs to be proper balance in planning between the need to meet housing targets and that to protect valuable sites which have heritage or conservation value. Paragraph 4.2.7 contains wording which goes some way in the right direction but: a) such wording should be included in Policy H2; and b) the wording needs to be considerably stronger.

The 2016 Plan contained the following wording: '*Developments affecting heritage assets and their settings should conserve their significance by being sympathetic to their form, scale, materials and architectural detail*'. We would wish to see the reinstatement of wording along these lines which underlines the need for balanced development rather than creating a presumption of development with insufficient regard for its context.

**Policies H5 Delivering affordable housing; H6 Threshold approach to applications; H7 Affordable housing tenure; and H8 Monitoring affordable housing:** We support the introduction of these policies and the thrust of the draft supporting text. As noted earlier in connection with Policy D8, we believe there should be a much higher level of transparency/accountability in relation to viability assessments to enable informed debate with interested parties other than the local authority. We strongly support Policy H7 on genuinely affordable housing and in particular the treatment of London Affordable Rent at Policy H7A1 and paragraph 4.7.4. We welcome the prospect of compliance with affordable housing targets being monitored more rigorously than has been the case to date.

## Chapter 7

As noted above, we would wish to see the reinstatement of the language of the 2016 Plan which underlines the need for balance in developments affecting heritage assets and their settings. This is in contrast to the language of the current draft plan which creates a presumption of development with insufficient regard for its context. We would wish to see explicit wording in the London Plan comparable to that in the 2016 plan (which was derived from paragraphs 131-135 of the National Planning Framework) stating explicitly that substantial harm to any designated asset will be permitted only exceptionally while less than substantial harm should be weighed against the public benefits of the proposed development.

**Policy HC1 Heritage conservation and growth:** Sections C and D acknowledge the importance of heritage/historic assets and their settings but are worded in such a way as to create a presumption for development with a subsidiary need to 'actively manage' cumulative impacts and 'minimise' and 'mitigate' harm. There should instead be a clear requirement for the value of heritage assets to be given explicit and significant weight in planning decisions and appropriate protections afforded to them as per the suggested wording above. There should be wording requiring 'protection from inappropriate development' rather the weaker 'giving consideration to the impact of unsympathetic



development'. The wording in paragraph 7.1.7 is weak and there is no guidance comparable to that provided in the 2016 plan.

**Policy HC6 Supporting the night time economy:** We broadly support this policy which is appropriately balanced. Section B4 should however be expanded to refer to the need for the night time economy not to have an adverse impact on mixed areas which are residential and provide retail outlets alongside entertainment venues.

## Chapter 8

**Policy G1 Green infrastructure:** We very much welcome the general policy that London's green infrastructure is to be protected, planned, designed, managed and integrated - together with the wide interpretation of what constitutes 'green infrastructure'. We welcome the intention to make London 'at least 50% green by 2050' but more clarity is needed regarding the meaning of this and the metrics by which it will be measured.

**Policy G3 Metropolitan open land:** We welcome the policy to protect, enhance and where possible and appropriate, to extent Metropolitan Open Land (MOL). We note and welcome the requirement that any change to MOL boundaries which results in loss must be accompanied by thorough evidence demonstrating exceptional circumstances. It is important that this is rigorously enforced.

**Policy G4 Local green and open space:** We strongly welcome the policy of protecting existing and providing new local green and open space. However the financing of this and how it fits with other aspects of the Draft London Plan are far from clear. Schemes in Opportunity Areas which can appear to be developer-led in important respects (see comments on Policy SD1) and insensitive developments on small sites, particularly in conservation areas (see comments on Policy H2) can result in an erosion of local green and open space - something which needs to be discouraged through stronger policies and their enforcement.

**Policy G5 Urban greening:** We welcome the proposals for Urban Greening but their effectiveness will be limited if they are confined to major development proposals. As has been found in Lewisham, intense urban development can, in practice, consist of an aggregation of individual proposals/schemes and any urban greening obligations could easily be overlooked or ignored in these circumstances.

**Policy G7 Trees and woodlands:** Consistent with the intention of this policy, development proposals should ensure that wherever possible existing quality trees are retained. Proposals to remove such trees should be rigorously scrutinised when planning applications are considered. Where trees are removed there should generally be a requirement to replant wherever possible, albeit recognising that this is a poor substitute for the removal of mature trees, which should not be permitted lightly. The planting of new large-canopied trees should be encouraged, including in new developments.



**Policy G9 Geodiversity:** We strongly support the protection of identified sites of special geodiversity interest, together with proposals to link these in trails with other green infrastructure. There are several such close to the Blackheath area.

## Chapter 10

**Policy T3 Transport capacity, connectivity and safeguarding and Policy T4 Assessing and mitigating transport impacts:** While it is difficult to disagree with the broad thrust and objectives of these policies, they are deficient in two respects.

- There should be a requirement for large scale planning proposals to be more explicit regarding the extent to which their viability relies on reliable and deliverable projections regarding transport infrastructure. As noted in our comments on policy SD1, there should be a requirement for local authorities to produce, in conjunction with developers, master plans which set out details of proposed developments in a coherent rather than piecemeal way and based on firm projections regarding transport capacity rather than aspirations or unfounded assumptions.
- Linked to this, in centres dependent on any form of rail transport, a clear process needs to be established whereby the necessary rail infrastructure can be guaranteed before permission is given for major development projects.

**Policy T9 Funding transport infrastructure through planning:** We agree that Section 106 agreements have a large role to play. This should be not merely to 'mitigate impacts from development' but to finance wider community (such as cultural) benefits. Importantly, councils should be required to put in place transparent processes whereby their use of Section 106 funds is explained and transparent to residents.

**The Blackheath Society**  
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