

## Jinder Ubhi

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**From:** Karl Brown [REDACTED]  
**Sent:** 22 February 2018 10:22  
**To:** Londonplan  
**Subject:** New Draft London Plan

Thank you for the opportunity to comment on the plan.

My comments relate to the indicated sections of the plan, other than for a few more general observations.

### General

Many statements spread across the plan are fully supported. Not unique, and highlighted here merely as an example: “7.5.2 ... culture also plays a role in building strong communities, increasing healthy life outcomes and generating civic pride.” There are many such examples, which are worthy of wide promulgation.

9.1.2 References new developments being designed and built with an intent to improve air quality. This is supported but is also one of many references throughout the plan, particularly in the early sections, where the focus on such good intent is limited to new developments. In the generality, I would wish to see the plan referencing all such worthy ambitions / requirements as the intent at all times and in all areas of London, ie “All stakeholders should bear in mind at all times and strive in all circumstances to work towards the requirements set for new developments, even when no new development is planned.” Or similar. We would all like the best local London wherever we live and work within it.

The Mayors own introduction talks of, “the London Plan revolutionising the way we get around our city - enabling a boom in active travel, with walking and cycling becoming the primary, default choice for millions of Londoners because we have made it far easier and safer.” Despite being a relatively compact central zone, and hence eminently walkable, it is far from straightforward to identify where in the plan the Mayor outlines the intent to switch substantive road space from the acknowledge current dominance of cars to space allocated to facilitate fast, attractive and safe, dedicated walking routes. Make it possible that walking from Kings Cross / Victoria / Waterloo to Holborn / Oxford Street / The City and such is a natural first choice.

### Specific References

1.0.5 Asks the question what the purpose of economic growth actually is. it would be most welcomed to see an indication as to how and when this important question is to be addressed referenced in the main document.

2.1.32 As with the informing Transport Strategy, and whilst not being specific, the implication in the plan is that the Wood Green (rather than the via Alexandra Palace option ) has the Mayors support as the choice for the New Southgate Crossrail 2 extension. As a transport driven solution (AP), rather than one focused on maximising development opportunity / income (WG), this increasingly looking fait accompli warrants close scrutiny.

2.1.36 Decking over and / or tunnelling under the section of the A406 referenced in this New Southgate section are two different approaches, but addressing two very different issues. The former is a development opportunity, the latter is an option to address an acknowledged dreadfully congested section of this busy road. This would appear to be expensive as well as disruptive to large areas of land nearby to allow access / exit from the tunnel(s). An alternate approach, linked to the air quality problem, of moving relevant volumes of east / west traffic to the M25 by a full extension of the ULEZ would appear to be substantially cheaper and far more environmentally favourable.

2.2.2 This highlights the near one third increase in London's household numbers anticipated by 2041. Having ruled out encroaching onto the green belt (2.3.1) the resultant land squeeze drives much of the plan. Transport will be a key determinant of the viability and happiness of Londoners in this more crowded city. The pace of change so far in moving from a space hungry, car dominated city to one where active travel and public transport is the primary culture to satisfy this bigger picture, seems far too slow. A more aggressive approach, including the timeline for related targets seems warranted.

2.6.1 and related. The focus on the importance of town centres as wide ranging support to communities, other than simply shopping, is welcomed.

3.7.9 The opening up of all public realm is supported. The desire should sensibly be extended to all publically owned open space where there is no compelling need to exclude access. A clear enforcement route would seem to be appropriate.

4.1.6 The need to market London homes overseas in the midst of an acknowledged housing crisis for Londoners themselves must be challenged. I understand New Zealand (?) and perhaps one other country have decided to draw a line on this practise given the scarcity and inevitable house price inflation it inevitably supports.

4.11.2 For the avoidance of doubt I would suggest a change of wording to: "Homes should not be used as short-term holiday rented accommodation for an aggregate a cumulative period of more than 90 days in any one year period without seeking planning permission"

5.1.4 The loss of social infrastructure, where replacement is required, then this replacement should be local to and of equivalent worth to the affected community. The plan would usefully make sure a stipulation specific.

Policy HC3 C In identifying Strategically Important Landmarks which make a very significant contribution to the image of London at the strategic level, the Mayors attention should be brought to the Gherkin. This iconic London landmark, designed as such - more so than an efficient office space - has been increasingly obscured by inferior towers of glass and steel. What is left should be given a high level of protection.

Other iconic views, with associated landmarks areas requiring protection are suggested to include: vistas to the City and Parliament from Waterloo Bridge; vistas up and downriver from Hungerford Bridge's Golden Jubilee Bridges; and the St Paul's view from the southern end of the Wobbly Bridge (given that every single tourist seems to photograph this one).

Section 9. I could see no reference to wood burning stoves or the personal / small business use of potentially high polluting tools such as angle grinders.

9.1.10 Rather than ruling out the “banking” of air quality improvements to potentially permit new, dirtier developments, it would be appropriate if a ratcheting down policy was in place such that any improvements became permanent via the repeated setting of a new, lower bar.

9.5.1 Water drought is an issue fully expected to get worse. Grey water use for many household, and minor industrial uses is entirely possible. There is no mention of retrofit opportunities to existing households and possibly surprisingly, for new developments

9.7.3 the uplift in recycling targets is welcome, although remains below that of eg Wales and some EU countries. However 65% of a lot remains a lot, so better if such recycling ambition was also tempered with a target addressing the absolute tonnage of London’s waste as well as waste per capita.

Policy S18B2 There remains a risk in a plan driven by an intense shortage of land, that waste authorities over-provide waste protected land as a contingency, or possibly simply to make their job easier. The policy would therefore benefit from the addition of the word, “only”, ie “allocate sufficient land and identify waste management facilities to provide the capacity to manage the apportioned tonnages of waste only.”

9.8.6 The addition of the word “only”, in the manner of Policy S18b2 above, again appears warranted.

9.8.7 By the introduction of “minimum” rather than “only” (see above) this gives WDA’s, via the boroughs where appropriate, a get out of jail card to over allocate waste land in a land-stressed plan. It is difficult to see that being appropriate when so many other factors, such as housing, transport and SIL’s are land stressed.

9.9.2 The maximum throughput of the last three years almost inevitably underplays the potential of a fully intensified site. Best practice from within the borough, or London, for an equivalent site would represent a much more demanding measure for operators / WDA’s.

9.15.4 Requirements on sustainable transport for bulk materials would benefit from being framed as relating to the equivalent transport comparison only. (The application for an waste incinerator at Edmonton dismissed approximately a decade’s worth of water transport consideration for lorries on the basis their CO2E externalities were merely at the margin compared to that expected to be emitted from the stack. Possibly but nonetheless such desperately bad planning would benefit from formal firewalls being built into the plan.)

Policy T1 a1) it is difficult to give any credence to a target for something as natural as walking 20 minutes per day to take more than a generation in achieving. This smacks of a lack of ambition – or possibly ideas. Five years, at the outside, seems entirely in keeping with the scale of the issue and its achievability given enough desire.

10.1.1 The “ambitious aim” to reduce dependency on cars will inevitably need to move from an “ambitious aim” to some specific carrot and stick supported by broadscale communication to ease the way via widespread understanding of the “why”.

10.1.2 (and 10.2.6) Noted the conclusion that this is the “only” solution. Agreed.

Policy T2 B2. The inclusion of “dwell” is welcomed.

10.2.4 “The dominance of vehicles should be reduced by using design to ensure slower vehicle speeds”. An intent within the plan to move to reduced limits (20mph or less) in all areas of public concentration – high streets, local shopping areas, outside travel hubs and rail stations – would seem to be an entirely sensible and achievable objective. Marking such safer zones by an alternate tarmac colour to the standard black may be one visual reminder to drivers.

10.2.8 It is not immediately clear what the “at source” is which is to be the target of reducing casualty and death numbers. Driver? Vehicle? Manufacturer? Nor is it clear what may be intended. Both would benefit from explanation.

10.5.4 Given their stated function as local centres for much activity, eg convenience shopping, it would be expected to see District and Local centres also included as areas having high potential for cycled trips.

1.06.1 The acknowledgement (here and elsewhere) of parked cars, not purely moving ones, as a detriment to public realm, health and more is welcomed.

Policy T8 J. Reducing the noise from passing helicopters is completely supported. The plan may wish to look ahead where eg large drones as a commenting tool were recently mooted in the press by an entrepreneur. Shifting noise and congestion from the streets to the sky is not a desirable outcome for ground based residents. Replacing “helicopters” with a form of words capturing human controlled aerial vehicles, or such, may be timely.

11.1.63 Refers to externality costs of motor transport and the desirability of what would be an effectively polluter pays principle. The University of Dresden undertook an EU wide study of such externality costs (before the more recent health costs of air pollution were highlighted) coming to a figure of approximately £1600pa per vehicle for the UK (the EU’s second highest). Confirming that piece of research and loading it, at least in part, onto the polluter would go a long way to meeting the plans objective of reducing the dominance of motor travel.

K Brown

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