

Ms Joanna Chambers comments

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The scale of ambition in the Draft London Plan is welcomed given the challenges facing London in particular delivery of the housing and infrastructure needed to maintain the City's global position. However, the length and complexity of the document raises concerns about how it will be interpreted and implemented at the Borough level and the delivery and quality of development that will result.

There are a number of potential conflicts and a lack of integration between policy areas- in particular the focus on densification in suburban centres alongside the focus on design quality, local heritage and culture, protection of Strategic Industrial Locations and Local Employment Locations and preserving intact the existing Green Belt boundary. The removal of density guidelines raises uncertainty at the local level about the potential impacts of densification on local character and the ability of local planning authorities to secure quality development which respects local character and delivers the infrastructure required to support such a significant increase in population and the level of urban greening promoted by the Plan. The Plan seeks to place communities at the centre of decision making about their neighbourhoods but needs to provide clarity in respect of how concerns about the impacts of densification will be addressed and how local communities will be engaged in this process. densification is a very poorly understood concept and needs to be better explained. The increase in housing targets over existing numbers raises concern about how this will be managed by local planning authorities given the pressures on resources and in particular the lack of design skills. Further technical support and resources will be required to ensure place making objectives are met.

The focus on small sites to accommodate future growth requirements also gives rise to concern about potential impacts on local character and services unless it can be effectively managed through the application of local guidelines and use of Local Development Orders. Again this highlights the need for effective strategic planning and design guidance at the Borough level to avoid piecemeal development and minimise local impacts.

The question must be asked NOW whether London can realistically grow within its existing boundaries. The Draft Plan has missed an important and vital opportunity for a comprehensive review of the Green Belt boundary- the potential to maximise opportunities for sustainable development close to transport hubs and to accelerate housing delivery in a planned way, whilst improving the quality and public access to a network of green space and green corridors. The failure to do this could prove to be a significant barrier to meeting London's housing needs.

The Implementation section is light and needs to go further in promoting more innovative delivery and funding models. Too much expectation is continuing to be placed on developers to deliver affordable housing *and* essential infrastructure and this will impact on delivery rates and the type of development coming forward. Viability will continue to drive delivery and a challenge for local planning authorities to balance against the objectives of the Plan and expectations of local communities. The Plan needs to be more proactive in this respect. Without this the ability to deliver London's growth requirements and ambitious targets must be questioned.