

Mrs Sarah Perry comments

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Local authorities need to be supported through policies within the London Plan, and support given on the ground from central government, in implementing the right kind of planning decisions for sustainable and "good growth" development, especially in relation to affordable housing and creating green infrastructure.

The National Planning Framework in its current form hinders good growth and undermines the holistic, and well-integrated principles set out in this revision of the London Plan. It provides too much scope for developers to not abide by the planning conditions set out by LA's through the principle of a proposed development not being "economically viable" and therefore corners able to be cut or appeals put forward by developers that LA's can't counter - including the final percentage of affordable housing stock created within a new development, and percent of green infrastructure invested in.

The draft London Plan seems to integrate its separate sections/aims well, however there needs to be additional strength/support given to LA's through the Plan/central Government to regain some control from developers/over planned development in order to implement the good principles and policies this Plan provides.

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The Build-to-rent model needs to be regulated through policy set out within this London Plan, to ensure the level of rent is affordable and doesn't contribute to the continually increasing rental price bubble that prevents young Londoners from saving for their first home.

Page: [Policy GG6 Increasing efficiency and resilience](#)

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Retrofitting estates and post-war/Victorian terraces is equally as important as enhancing new developments to securing a carbon-zero future by 2050, especially because of the large amount of housing stock these contribute across London. A high proportion of these types of property are controlled by the private rental sector, as well as being social housing within the public sector, of which there needs to be some sort of regulation/policy in place to ensure private landlords are made to contribute to creating a lower carbon economy, especially considering the level of rent that these properties are generating for the private sector. Addressing this issue would also contribute to fulfilling policy GG3 which references creating health equality including the state of rented homes people live in.

The London Plan might aim to address this issue in some form within this section.

There are many more pockets of public open space and local green spaces that contribute to promoting, and protecting, London's biodiversity along with giving Londoners access to green space to promote health and well-being, and these are not solely designated as Metropolitan Open Land, Local Nature Reserves, or Green Belt land.

These parks and green spaces, especially in regards to "hinterlands" around development and green corridors, need to be afforded the same relevant protections from development as MOL/Green Belt land, in order to contribute to the Plans's target of 50% green cover by 2050 and increasing biodiversity, reducing ill-health and poor air quality.

Furthermore, new green infrastructure needs to be included in planning decisions/applications from the beginning, instead of being retrofitted into a development plan as an after thought, which causes longevity problems for the green infrastructure invested in. Street trees are an example of planning after-thoughts whereby the cradle of the trees are not large enough to support long-term growth/adequate watering and nutrition and they will ultimately die sooner with no funding provisions made to replace them. This will affect the London Plan target of 50% cover by 2050 in the long term. The Plan could make specific recommendations about the need for pre-planning/integrating green infrastructure early in development applications, especially in relation to street trees/shrubbery, that will help secure a longer term future for this investment. and meeting the aims of the London Plan targets

Page: [Policy G1 Green infrastructure](#)

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Strong section within the Plan. Good to see urban greening/green infrastructure protection and additional provision is being given a strong benchmark within the new Plan. Salient point to mention that green infrastructure needs to be fully integrated from the start of a development application or Local plan so that the green assets implemented function, enhance the social and environmental cohesion across London and also survive for the long term especially in the case of street trees, which die prematurely if not properly planned into a development.

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Excellent policy, this should remain a focus. However, strength needs to be given to Local Authorities through the National Planning Framework/Central Government/London Plan to be able to turn down planning applications that would undermine this policy.

The discrepancy between the need for additional housing, economic development and protection of green spaces is addressed strongly within this new Plan and is done so in a holistic way, especially in relation to the Spatial Planning, Good Growth and Green Infrastructure sections. However could the Plan go further to support implementation by Authorities of this integrated approach on the ground?

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Excellent point, clear strategy/policy.

When working with the Borough's to assess the extent to which derelict parts of the green belt could be enhanced for access/Londoners the importance of the other points mentioned in this policy (biodiveristy, ecological resilience, plus habitat connectivity and diversity) need to be strongly accounted for as increased access may lead to less diverse/rich pockets of green belt.

Page: [Policy G3 Metropolitan Open Land](#)

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Strong section and policies laid out are clear and give a positive message in relation to the value of London's green spaces.

In relation to the guidance given about assessing interventions that may enhance MOL, there needs to be advanced, site-specific consideration given to increasing access/leisure facilities on MOL which could impinge heavily on certain MOL's biodiversity and natural signature.

For example, there is a lot of local pressure on Local Authorities in regards to Beddington Farmlands MOL in the Wandle Valley, in terms of increasing access to all parts of the site once the process of habitat restoration is completed by the current land operator, Viridor. Local Authorities need to be given clear direction when assessing how MOL may be enhanced, as on sensitive sites such as Beddington Farmlands, increased public access across the whole site would significantly disrupt some of the priority listed species found there, specifically the bird colonies.

Policy 8.2.2 of the previous section on Green Belt may be also better referenced in this section, in terms of a major assessment of the benefits of a site in its entirety need to be considered before enhanced/development in any way is undertaken and the Mayor will work with the Boroughs' to do this according to the London Plan guiding principles.

Page: [Policy G4 Local green and open space](#)

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This policy needs to strengthen protection for existing green space even in areas that are not considered deficiency areas. By including this policy in this manner it gives weight to developers applying for permissions to over-develop/inappropriately develop local, important green spaces not in deficiency areas, as opposed to looking to develop brownfield sites as specified as priority in other parts of the London Plan. This statement counter-acts other sensible, effective policies/guidance laid out in the plan under Spatial Planning and Good Growth sections and should be revised to ensure all existing, locally important (for Londoners AND biodiversity) green space protection is strengthened.