
From:
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Dear Mayor of London,

These are my comments in relation to the above mentioned consultation -

- A more realistic, phased approach to achieving the target for housing completions is needed based on the sequential release of land prioritising brownfield land in 'Opportunity Areas' and brownfield land first (Policy H1)
- There should be 'net gain' rather than 'no net loss' of green space and biodiversity from housing development on small sites (Policies H1 and H2 and paragraph 4.2.9)
- Targets for affordable housing provision should be increased to better reflect the findings of the Strategic Housing Market Assessment half of which should be social/genuinely affordable rent (Policies H5-H7)
- Excessive housing densities in new development should be resisted to protect the local character of London's neighbourhoods (Policies D1 and D6 and HC1).
- The welcome commitment to protecting the Green Belt (Policy G2) requires stronger enforcement.
- It is wrong to promote the principle of 'land swaps' (paragraph 8.3.2) involving Metropolitan Open Land as this undermines its protection (Policy G3).
- Private and public gardens should be protected alongside other local green and open spaces (Policy G4).
- Policies and funding are needed to improve the quality of green space and the wider public realm by reducing noise, light and air pollution, increasing biodiversity, and giving stronger protection to mature trees and hedgerows (Policy D7, and Policies G4-G7 and DF1).
- Support for food growing should be strengthened with a policy to protect 'best and most versatile' agricultural land from development (Policy G8).
- Informal and formal outdoor sports facilities, including for ball sports, should be protected and enhanced (Policies SD1 and S5).
- A more strict approach is needed to reduce reliance on the private car, including reduced parking provision in new developments and promotion of more sustainable transport modes (Policy T4).

The following sections outline specific changes to policies and supporting text in the draft London Plan that would help address these shortcomings.

Housing supply

We welcome the aspiration to meet the need for 65,000 homes a year identified in the Strategic Housing Market Assessment. We are concerned that given recent completion rates this is an unrealistic target. Policy H1 should be amended to recognise this.

Proposed change: The delivery of housing in Opportunity Areas and on brownfield land should be prioritised by amend in Policy H1 B1 so that these areas are identified first on the list and the following words added so that H1 B1 a) instead reads: **prioritise the delivery of housing capacity identified in Opportunity Areas and on brownfield land and only then:'**

Rationale: The new annual housing target of 65,000 homes a year is well in excess of what has been achieved in recent years. Total housing output has rarely exceeded half of that level over the past 10 years and last year reached 41,000 only through the inclusion of significant levels of conversions and changes of use which are unlikely to continue at the same rate. It is vital if the objective of making best use of land, as expressed in Policy GG2, is to be achieved that a phased approach to land release is pursued prioritising those areas which are most suitable for new housing development, such as Opportunity Areas and brownfield land.

Small sites

We welcome recognition in the draft plan of the contribution to housing supply that can be made by small sites. Policies are, however, too lax to prevent the loss of valuable green space as a result.

Proposed change: Policy H2 D1 should be amended to read 'infill development on vacant or underused sites provided this does not result in the loss of green space or sites of biodiversity value.' Paragraph 4.2.9 should be deleted or amended to make clear that urban greening measures should be promoted in all small housing developments rather than as compensation or mitigation for the loss of green space.

Rationale: The proposed presumption in favour of development of small sites is a potentially powerful tool for increasing the provision of housing in such locations. As currently drafted however, this could lead to the unacceptable loss of valuable green space thereby undermining the Mayor's commitment to increasing London's green cover. There should be a net gain of green cover in all developments, however small the sites, rather than 'no net loss' as currently expressed in paragraph 4.2.9.

Affordable housing

There is a widely recognised crisis in the lack of affordable housing provision in London. This needs to be addressed through bold policies in the London Plan which require a higher proportion of genuinely affordable housing in all developments than currently proposed.

Proposed changes: The strategic target for affordable housing in Policy H5 should be increased from 50 to 60%, with the target in A 4) increased to 60% and the target in A 5) to 70%; Policy H6 B 1) should set the threshold level of affordable housing initially at a minimum of 50%, with 2) and 3) increased to 65%. Policy H7 should require that a minimum of 50% of affordable housing should be for social/genuinely affordable rent, with other proportions adjusted accordingly.

Rationale: The evidence in the Strategic Housing Market Assessment identifies the level of need for affordable housing as 65% of the total housing requirement. This level of need will not be met with the targets and threshold levels currently contained in the draft Plan. The final Plan needs to establish challenging yet realistic targets in order to inform the development of policies in Borough Local Plans. Unless significant steps are taken towards addressing the affordable housing crisis in London the Mayor's call for a 'City for all Londoners' will be seen simply as an empty slogan.

Density, design and local character

More efficient land use (including road space)

We welcome the overarching policy GG2 concerning making the best use of land. This should be strengthened by reference in policy H1 to making use of excessive or redundant road space.

Proposed change:

Policy H1 B2d) should be amended to include reference to excessive or redundant road space and other car-related infrastructure so that it reads 'the redevelopment of surplus utilities and public sector owned sites, including excessive or redundant road space.'

Rationale: There should be a more ambitious approach to realising the benefits in terms of land use of achieving the target of 80% of journeys in London to be by active or sustainable modes. This should release a large amount of space currently devoted to private motorised traffic. There needs to be more direct reference in the Plan to the over-allocation of land for 'grey' or car-related infrastructure, to support for measures to reclaim redundant road/car space, and to turn into reality the opportunity to turn 'grey to green' thereby helping to achieve the Mayor's target for greening London.

Housing density and design

We broadly welcome policies D1 to D6 in the draft London Plan which seek to improve the design and land use efficiency of new housing. We believe policy D6 concerning the optimisation of housing density needs to be amended to avoid a lack of associated public infrastructure, and excessive housing densities and 'town cramming'..

Proposed changes:

There should be explicit reference to maximum density limits in Policy D6A, linked to the GLA's 2016 'density matrix' to inform the proposed design-led approach. These should also be applied in Policy H2B2) concerning housing on small sites to prevent overdevelopment.

The phrase 'in exceptional circumstances' should be deleted from the last sentence in Policy D6B 3) so that it reads 'This may mean that development is contingent on the provision of necessary infrastructure and public transport services...'

To ensure careful scrutiny of design standards, the density levels specified in Policy D6C should be amended to 80, 170 and 260 units per hectare respectively so that it reads: ' 1) 80 units per hectare in areas of PTAL 0-1; or 2) 170 units per hectare in areas of PTAL 2 to3; or 3) 260 units per hectare in areas of PTAL 4 to 6'.

Rationale: In pursuing the welcome goal of making best use of land as set out in GG2, great care should be taken to avoid overdevelopment. This requires stronger policies to ensure that major new housing development is accompanied by adequate provision of supporting infrastructure including health facilities, schools, public green space, and public transport services. This will help prevent the overloading of existing social infrastructure which is already having a significant impact on quality of life in many parts of London. There should also be stricter requirements for design review and scrutiny in order to avoid new housing development at excessively high densities which result in overcrowded neighbourhoods and reduce their 'liveability'. These measures are particularly important to avoid fuelling land value inflation through encouraging speculation and opportunism by developers.

Local character

The draft Plan gives insufficient consideration to the protection and enhancement of London's diverse local character. Policies D1 and HC1 need to be amended to ensure that greater attention is given to the character map of London, and community or neighbourhood plans, in planning and designing new development.

Proposed changes:

The first sentence of Policy D1 'London's form and characteristics' should be amended to make specific reference to neighbourhood and community plans so that it reads 'Development Plans, area-based strategies, neighbourhood and community plans. and development proposals should address the following:' The phrase 'reflect and enhance local character and distinctiveness' should be added to the list after 1) in Policy D1A.

The first sentence of Policy HC1 'Heritage conservation and growth' should be revised so that it reads: 'Boroughs should, in consultation with Historic England, other relevant statutory organisations and local community and neighbourhood planning groups, develop evidence that demonstrates a clear understanding of London's historic environment, local character and distinctiveness.'

Rationale: The diverse and distinctive local character of London's neighbourhoods are a major component of its attractiveness and vitality. Recent and future development to accommodate the need for new housing and economic activities risks damaging the distinctive character of London resulting in homogenous 'anywhere' places unless greater attention is paid to the underlying character of its diverse neighbourhoods. Neighbourhood plans and other community planning initiatives are a potentially important means of identifying local character and distinctiveness and should be actively promoted in the London Plan

Protecting and extending green space

Green Belt

We welcome Policy G2 and particularly the proposal in Policy G2B that 'de-designation' of Green Belt will not be supported. This policy needs to be reinforced for it to be effective.

Proposed change: A presumption against the alteration of Green Belt boundaries which reduce its extent should be included in policy G2B so that it reads: 'The extension of the Green Belt will be supported and its de-designation will not. We will enforce a presumption against the loss of Green Belt'.

Rationale: The release of Green Belt land is being proposed in numerous locations across London. There is a need for an increase in capacity to enable the GLA to follow up this commitment and to object effectively to any proposals for Green Belt release. Unless strongly resisted, the loss of Green Belt will seriously affect the ability of the Mayor to realise his ambitions for protecting and extending existing green space.

Metropolitan Open Land (MOL)

We welcome recognition that MOL should be protected from inappropriate development but this policy is undermined by Policy G3 C and the provision to allow 'land swaps'.

Proposed changes: Policy G3 C should be deleted along with the sentence in paragraph 8.3.2 “The principle of land swaps could be applied to MOL where the resulting MOL meets at least one of the criteria set out in part D of this policy”. Policy G3B should be amended to read: ‘The extension of MOL designations should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs.’

Rationale: The protection of MOL should be supported unequivocally to help realise the Mayor’s ambition to increase green space. ‘Land swaps’ undermine this because:

- The unique location and qualities of MOL are irreplaceable.
- They undermine the ‘essential characteristic’ of permanence, as set out in paragraphs 79-92 of the National Planning Policy Framework (NPPF), which as stated in paragraph 8.3.2, applies to MOL as it does to Green Belt.
- The proposed policy states the MOL resulting from a swap should meet ‘at least one of the criteria set out in Part D’, which could easily be read as ‘only one of the criteria’. This means the resulting MOL is highly likely to be qualitatively considerably less valuable.
- The principle of land swaps creates a loophole that will be exploited by developers and others in ways that reduce the contribution of MOL to quality of life in London.

The open nature and environmental qualities of MOL are constantly being eroded by damaging proposals for inappropriate development. Strong policies are required to halt such speculation and opportunism, rather than policies which suggest that it is acceptable to build on this land even if lesser quality MOL is created an unspecified distance away.

Private gardens (‘garden grabbing’)

We broadly welcome Policy G4 concerning local green and open space. We are concerned however that this contains insufficient recognition of the contribution of private gardens to the extent of green space. A policy is needed to prevent extensive ‘garden grabbing’.

Proposed change:

Policy G4 A should be revised to include reference to private gardens to read: ‘Local green and open spaces, including public and private gardens, should be protected’.

Rationale: We welcome the Mayor’s aim to encourage the intensification of land use in London, including by promoting the use of small sites for housing (with reservations addressed above). Policies need to ensure that this does not result in the loss of green space, whether public or private. Any presumption in favour of building on small or underused sites should favour adding storeys rather than building out into private gardens.

Green space quality

Green space deficiency

We welcome support for the creation of new areas of accessible green space. This should be strengthened by requiring measures in Policy G4 to improve the quality of green space.

Proposed change

- Policy G4 C - should read “Assessments should identify areas of public green and open space deficiency, including an assessment of deficiency in quality, taking account of Green Flag criteria, light, noise and air pollution, and using the categorisation set out in Table 8.1 as a benchmark for all the different types required.”
- Policy G4 E 1) should include at the end ‘including an assessment of, and where appropriate a plan, to improve the quality of the space’.

Rationale: We support borough assessments of local green and open space to inform policy. To increase the benefits of green space, these should include an assessment of, and where appropriate a plan to improve the quality of the space i.e. an assessment of deficiency in quality rather than just amount of green space and its accessibility. For example, CPRE London’s recent research has found that nearly 30% of London’s parks and green spaces are severely impacted by noise from traffic (and presumably associated air pollution). Much green space is poor quality in other ways, such as poorly designed or excessive lighting. The Plan should require boroughs to enhance and manage all greenspaces to a high, specified standard referencing the Green Flag criteria.

Noise and green space

The policy on noise should make explicit reference to the need to reduce the impacts of noise on green space and the wider public realm, and other relevant policies amended accordingly.

Proposed change:

Policy D7 should be strengthened by adding a new sub-section after A) stating Development Plans and development proposals should: **Take account of the need to protect and enhance the relative tranquillity of the public realm, particularly parks and green spaces and quiet walking and cycling routes.**

Additions should also be made to Policy D13 Noise as follows:

Para B: Boroughs [etc] should identify and nominate new Quiet Areas and protect existing Quiet Areas in line with the procedure in Defra's Noise Action Plan for Agglomerations and ensure local green space is improved in line with Policy G4 (as amended) including by:

- **taking action to reduce traffic noise around parks which are severely impacted by traffic noise and pollution, using such measures as temporary/weekend street closures and/or permanent re-routing of traffic; or introducing natural or man-made noise barriers.**

Policy H6 concerning the night-time economy should be amended by adding the following sentence after sub-section B 1) - **'adopt measures to protect the peace and quiet of public green and open space within or nearby areas of night-time activity.'**

Rationale: The impact of noise pollution on human health are second only to air pollution according to the World Health Organisation. The ability to experience peace and quiet is an important aspect of the quality of urban life. Green spaces should provide respite from the noisy urban environment. Our recent research shows that nearly 30% of London's parks are severely impacted by traffic noise (i.e. between 50% and 100% of the park is noisy). Policies should encourage action to tackle this growing problem.

Funding to improve green space

The provision and improvement of green space requires funding to help deliver the Mayor's aspirations for 'good growth' and increasing London's green cover and should be addressed in Policy DF1.

Proposed change: Policy DF1 D (2) should be amended to read as follows:

'Recognise the importance of affordable workspace and culture and leisure facilities, including public green and open space, in delivering good growth.'

Rationale: Planning obligations and a proportion of Community Infrastructure Levy should go towards improving parks and green spaces. Where there is major development, in particular close to parks or green spaces, there ought to be a contribution by developers towards improving the quality, including enhancing the tranquillity, of green space, and to help fund future management, for example via an endowment.

Urban Greening

The 'Urban Greening Factor' outlined in Policy G5 does not address the human use of green space and overlooks qualitative considerations and a wealth of knowledge about how people use green spaces and how design can enhance their experience.

Proposed change:

Policy G5 - a further sub-section should be added as follows: **(C) Urban greening required and delivered in new developments will be additional to requirements to provide adequate green and open space as set out in G4. New developments must allow for provision of new green and open space in addition to meeting urban greening requirements.**

Rationale: Urban greening provisions are supported in general. It should be made clear, however, that this should be in addition to green space provision and the amenity those spaces provide. Those designing new developments should be required to consider the amount and quality of green space needed to fulfil human needs, as well as the amount of green cover required as part of the Urban Greening Factor. Unless this is made explicit in the London Plan, there is a real danger that the Urban Greening Factor will be used by developers to reduce the amount and quality of green space available for public use.

Biodiversity

The approach to biodiversity and access to nature outlined in Policy G6 needs to be strengthened to avoid the loss of valuable habitats and wildlife.

Proposed change:

Policy G6 - The second sentence in sub-section A of this policy should be deleted, along with the whole of sub-section C. The following sentence should be added at the start of sub-section D **'All new development should seek to enhance biodiversity.'**

Rationale: All Sites of Importance for Nature Conservation (SINCs) are precious and deserve to receive the highest level of protection. There should be no provision in policy which would allow development to harm a SINC regardless of their supposed relative significance. It is unlikely to be possible to compensate for the loss of biodiversity through alternative 'off-site' provision as the value of a site is often intimately connected with its location.

Trees and hedgerows

Mature trees are a vital part of London's green infrastructure and there should be strict controls over felling them in Policy G7, along with recognition of the importance of established hedgerows.

Proposed changes:

The value of hedgerows should be recognised in subsection B 1) of Policy G7 by amending it to **'protect 'veteran' trees, mature hedgerows and ancient woodland,,,'**.

The first sentence of Policy G7(C) should be amended so it reads as follows: **"Development proposals should ensure that existing trees of quality, mature trees and hedgerows, and trees of value in terms of delivering eco-system services such as water or air quality management, are retained.**

Rationale: Inappropriate tree felling and hedgerow removal is something CPRE London is contacted about on a regular basis. This is a growing problem and policies need to be stronger and clearer to protect London's existing trees and hedgerows, and the benefits they provide. Planting new trees is never an adequate response to the loss of existing mature trees or hedges whose contribution to environmental quality will invariably take decades to replace.

Food growing

We welcome support for food growing in London and this should be supported by a policy to protect good farmland from development.

Proposed change:

Policy G8 should include a sub-section 3) which states: **'should protect 'best and most versatile farmland' from development.**

Rationale: Access to suitable land is a major constraint on increasing the supply of local food within London and providing opportunities for community-supported agriculture. High quality, or 'best and most versatile' land under the Agricultural Land Classification system, is in short supply and should be protected from development in local plans and development control.

Outdoor sport and recreation in Opportunity Areas

Policy SD1 on Opportunity Areas should require sufficient space for the amenities usually provided by parks, in particular playing fields and courts for open air sport.

Proposed change:

Policy SD1 B(3) should be amended to read **'plan for and provide the necessary social and other infrastructure to sustain growth, working with infrastructure providers where necessary, and ensuring open and green space is planned to accommodate informal and formal outdoor sports.**

Rationale: There is a danger that major new developments are created without sufficient open and green space to accommodate the amenities usually and necessarily provided by parks. In particular, there is a need for open, flat space required for open air sports, both formal and informal, including ball courts. Explicit provision should be made for such facilities in line with sports provision strategy anticipated demand.

Outdoor sport and recreation facilities

A decline in the quality of use of sports facilities is often used as an excuse for allowing development of public open spaces which needs to be addressed in policy S5.

Proposed change:

S5 B(4) This should be amended to read: **"ensure that there is no net loss of facilities. If there is evidence that ongoing or future demand for sports means facilities are under-used measures should be taken to ensure demand is promoted through a local sports strategy or to repurpose the space for an outdoor sport for which there is demand."**

Rationale: There is a cycle of decline in sports facilities, both green fields and hard courts, where underinvestment leads to under-use and this ultimately leads to the loss of those facilities. Currently the run-down ball courts on Shoreditch Park, for example, are due to be built on despite open air ball courts being at a massive premium in this central London area. Policies need to be framed to address this problem and recognise that demand for sports is uniquely tied up with available facilities and often the presence of clubs that promote them locally.

Transport and measures to restrict car use

Car parking provision

The plan seeks to further restrict car parking in new development and to reframe the link to PTAL. Allowing excessive car parking in Policy T4 is inconsistent with the main transport policies which seek to reduce car trips.

Proposed changes:

- The following amendments should be made to Policy T4(C) - 'Where appropriate' should be deleted and Policy T4(D) should be changed to read "...planning permission ~~may~~ will be contingent on the provision of necessary public transport and active travel infrastructure."
- Table 10.3 - The bottom four rows should be amended so that the maximum parking provision in a development in any area (whatever the PTAL) is 0.3 spaces per unit.
- Paragraph 10.4.4 - the word 'Ideally' should be deleted and the sentence reworded as follows: "~~Ideally~~ New development of all sizes, but in particular that which will give rise to significant numbers of new trips, should be located in places well-connected with public transport..."
- Policy T6 H: should be amended to read "Boroughs wishing to adopt borough-wide or other area-based car-free policies will be supported. *[Delete the outer London caveat sentences.]* Minimum standards are not appropriate for residential or non-residential land uses in any part of London."

Rationale: Development in Low PTAL areas (the vast majority of London) should be accompanied by improvements which increase the PTAL *rather than* low PTAL being a reason for allowing high car-space provision. The maximum car space per unit levels in low PTAL areas in Table 10.3 (as high as 1.5 spaces per unit - albeit this is a maximum and lower levels would be expected with small units) are too high to be consistent with the main Policy T1 (delivering 80% of trips to be made by foot, cycle or public transport by 2041). The maximum should be reduced to 0.3 for all areas whatever their *current* PTAL, with measures required to increase the PTAL if a development is to go ahead.

City Region planning and transport goals

The Mayor's goals for reducing car traffic risk being undermined by car-dependent development in neighbouring authorities requiring amendment to Policy SD2.

Proposed change:

There should be an addition to Policy SD2 E so it reads: 'The Mayor will work with WSE partners to find solutions to shared strategic concerns such as: reducing the need for *car travel, barriers to housing... etc*'

Rationale: There is evidence that car use is rising within London contrary to the Mayor's transport objectives. CPRE London has mapped 450 proposed development sites in London's Green Belt the majority of which will be car dependent. In total they will generate upwards of 5 million trips a week within or just outside the GLA border. This underlines the pressing need for a strong connection between the London Plan and planning authorities in the Wider South East in order to tackle car use. I am particularly concerned that the sports and leisure sector continues to seek to add additional car parking. This has been evidenced in both Waltham Forest where I live and also in the neighbouring London Borough of Hackney. This trend needs to be reversed especially as the result of many public transport improvements and the mini Holland and Cycle Superhighway infrastructures.

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