

London Borough of Bexley
Officer level comments to *A City for all Londoners*
16 December 2016

Thank you for the opportunity to comment on *A City for all Londoners*.

A City for all Londoners outlines robust policy responses to the challenges and opportunities faced by London in the coming decades. The broad strategic approach to plan and strategy making is ambitious. We broadly welcome the approach outlined in the document.

Our response sets out a number of issues of particular interest to Bexley. We hope that it will help to inform the upcoming strategies, including the new London Plan, and explain how Bexley can be supported by the GLA to allow the borough to play its full part in meeting London's potential.

Meeting need for housing

The document estimates that at least 50,000 homes will need to be built in London every year between now and 2041 to meet the housing demand of a growing population. The ambition to meet most of London's population growth within the boundaries of Greater London is a sustainable approach to accommodating new housing, provided that it is planned for appropriately including the securing of necessary infrastructure.

London Borough of Bexley is committed to playing its part in meeting this target. We are developing a draft Growth Strategy that has tentatively identified capacity for 31,500 new homes for the riverside ark from Abbey Wood to Crayford. This is larger than that envisioned for Old Oak and is nearly twice the level of housing emerging on the Olympic site. By any measure, the level of growth proposed will amongst be the largest in London.

We propose to develop large, inefficiently used employment sites around our stations in the north of the borough. These well-connected places could see new higher density neighbourhoods offering a range of homes served by 'walk to' facilities and high tech infrastructure with access to a variety of good quality jobs both locally and in economic centres outside the borough.

However, this scenario is not achievable without the support of necessary infrastructure. Whilst the coming of Crossrail to Abbey Wood will enable some additional levels of development, truly high growth is premised on the securing of a major uplift in supporting transport infrastructure in the borough. Most significant is the proposed Crossrail extension to Gravesend (C2G) and a new Thames Crossing at Belvedere. We are pleased that the document recognises that Crossrail extensions could lead to the development of hundreds of thousands of new homes. We also welcome the proposed public transport river crossings mentioned in *A City for all Londoners*, including a new DLR crossing between Gallions Reach and Thamesmead and the possible extension of the Overground to Abbey Wood. However, we do not consider that these interventions are sufficient to realise Bexley's full potential.

Transport infrastructure is key, but without provision of other infrastructure these new communities will be unsustainable. New housing requires access to jobs; it needs local services and facilities to support leisure and social interaction including community centres and meeting places, play space, and recreation centres; it means higher demand for schools and health facilities; and it requires access to green and blue infrastructure and support for

biodiversity. It also requires more local transport infrastructure, such as support for new bus routes and trams, and provision of utilities. Many of these requirements are identified by the document as elements of achieving Good Growth and as such, the new London Plan must provide policies and mechanisms to ensure they can be secured.

Housing Zones

Housing Zones are one mechanism mentioned for securing necessary housing across London. We welcome the continuation of the Housing Zone initiative.

As the GLA knows, Bexley is the location for the Abbey Wood and South Thamesmead Housing Zone, which will see a £400 million investment, including £35 million from the GLA, support the creation of 1,216 new homes. Nearly half of the homes will be affordable, and well-designed housing and improved infrastructure will help to regenerate the area. However, our experience has identified a number of improvements that can be made to the Housing Zone programme, including:

- simplifying the contract/due diligence process;
- the GLA being more involved in brokering/lobbying;
- the GLA area managers being given more authority;
- less emphasis on housing numbers and more about regeneration and infrastructure provision to create Good Growth; and
- a greater understanding of the boroughs' resource capacity.

Suburban infill

We note that the Mayor anticipates that growth in outer London boroughs like Bexley will not be confined to large developments in Opportunity Areas/Housing Zones, town centres, and around stations, but will also take place through '*smaller-scale housing developments in appropriate suburban locations.*'

We recognise that sensitive suburban infill can be appropriate with well-designed schemes that fit within the existing suburban context. Neighbourhood parades, which are often centres of the community and on bus routes, offer development opportunities, where flats can be provided at higher densities above shops.

However, it is essential that design solutions respect the existing character and context, and provide many of the aspects of suburban housing that is attractive to our residents. We agree with the sentiment in *A City for all Londoners* that design should respect local character and context, and that all character types can accommodate some growth, as long as an understanding of the underlying nature of that character guides the nature of that growth. In Bexley, we have developed housing typologies, which take inspiration from Bexley's suburban character but also recognise that higher density housing can integrate well into the existing built form.

We also note that by its nature, suburban infill is often very small developments. These come with no direct planning contributions, including affordable housing, and little Community Infrastructure Levy; as a result, they add residents to an area but do not provide any of the infrastructure necessary to support the increased demand for facilities and services. If suburban infill outside of town centres is to be pursued in the next London Plan, it must offer solutions to ensure that sufficient infrastructure is provided, in line with the concept of Good Growth.

Infrastructure Investment Corridors

We support the Mayor's proposals for joint infrastructure investment corridors (where infrastructure is planned to open up housing and other development) that stretch out beyond London's borders.

In southeast London, a joint investment corridor must be the Crossrail extension to Gravesend (C2G). This would help to realise the full development potential of Bexley, as described above, whilst also connecting it and London to promising developments like Ebbsfleet Garden City and the proposed resort on the Swanscombe Peninsula.

The north of Bexley and north Kent is an area characterised by vacant or underused employment land, former quarries and relatively low density residential areas capable of intensification and renewal. Business leaders are all agreed that the most important barrier to growth has been lack of connectivity to major employment centres in inner and central London and other regional attractors. Connectivity is key to unlocking sites as it will improve development viability, stimulate market interest, promote regeneration, increase productivity and create greater access to jobs.

The Thames Gateway has been identified as a regeneration area for decades, but has not yet met its potential. The identification of the area as a joint investment corridor by the GLA, matched by support for a Crossrail extension, would offer significant opportunity for housing and jobs growth.

Tall buildings

We agree that tall buildings have a place in London but only where they demonstrate benefit to the existing community through a positive contribution to the streetscape and skyline, good relationship with activities on the ground, and no negative impact on local daylight, wind turbulence, glare, and noise.

London Living Rent

A City for all Londoners refers to the establishment of the London Living Rent, under which rents are set at no more than one third of the local average household income, which was also subject of a separate consultation to which Bexley responded.

Whilst Bexley supports the principle of providing affordable housing for working Londoners there are a number of significant concerns over how this initiative will be targeted and implemented. Bexley has raised concerns that if rents are based on Bexley average incomes, then local residents would have to compete in a market where they already struggle with more affluent renters relocating from other areas of London in search of lower rents.

With close to 1,000 people in temporary accommodation and growing numbers of households with no recourse to public funds, Bexley is experiencing unrelenting pressure on a reducing supply of new 'affordable' rented homes into which to discharge the Council's statutory duty. Given this, in the interests of providing an offer that is truly affordable for local people, we have serious reservations about the London Living Rent proposals.

Night-time economy

We are pleased that the Mayor is committed to developing the night-time economy as a productive and safe aspect of London's economy and culture.

We remind you that the night-time economy is not confined to central London. Bexleyheath, for example, is a centre for the night-time economy within southeast London, with restaurants, pubs, bars, and night-clubs attracting a wide range of people from across the region. The Night-Time Economy Supplementary Planning Guidance should recognise the importance of the night-time economy in many outer London town centres.

Whilst we have a Bexleyheath Night Vision Strategy (2009) to help improve the diversity and quality of the town centre's evening and night-time economy, support from the GLA through the Night Czar will be helpful to realising our ambition.

Creative Enterprise Zones

We support the creation of the proposed Creative Enterprise Zones to assist the artists and creative workers who may otherwise struggle to work in London.

Sidcup is home to two internationally renowned performing arts colleges, Rose Bruford and Bird College, which both attract creative young people who come to the borough to study. The town centre is also benefitting from significant regeneration, including the expansion of a growing night-time economy.

The Council would be keen to discuss the potential for a Creative Enterprise Zone in this context, whilst the opportunity for the creation of a cultural hub should also be highlighted in the proposed Cultural Infrastructure Plan, which will establish the city's cultural requirements up to 2030.

Hotel Accommodation

The document estimates that London will need at least an additional 40,000 hotel rooms by 2036. Bexley is keen to play a part in accommodating that hotel growth as part of a high quality leisure offer. The borough's strategic location both on the trunk road network and with access to central London make it an ideal location for additional hotel growth, particularly in the context of the resort proposal on the Swanscombe Peninsula.

Thank you for considering our comments.

Kind regards,



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