

London Plan Examination in Public

Friends of the Earth (755)

Matter 10. Should the vast majority of London's development needs be met within London?

a) Is the approach of seeking to accommodate the vast majority of identified development requirements between 2019 and 2041 within London justified and would so doing contribute to the objective of achieving sustainable development?

1. We agree that the vast majority of London's development needs should be met within London. However, we would query the basis for identifying London's development needs, in particular, whether the overall level and nature of growth which the London Plan proposes is justified. To establish 'development needs' requires in our view a greater focus on the needs of London's diverse communities and places, including their capacity to accommodate growth, while at the same time deliver on wider aspirations of the plan, such as on air quality, zero carbon, green infrastructure and other prerequisites for London to be a healthy, sustainable city.
2. To accommodate the scale of development the plan proposes in a way that contributes to sustainable development, will require the plan to have a stronger environmental focus than it does a present. There will need to be greater emphasis on meeting housing needs as opposed to market demand; stronger plans and policies to deliver sustainable infrastructure; and a clear framework for implementation, monitoring and review. Other aspects of the plan which need amending include: strengthening the requirement for renewable energy generation on site for all major development; a commitment to creating a sustainable economy (addressing the lack of any environmental dimension in policy GG5); additional measures to tackle air pollution; and policies that ensure that new homes are not delivered at the expense of green space (at ground level), a healthy local environment, high quality public realm and local employment opportunities.

b) Alternatively, would accommodating more of London's development needs in the wider South East and beyond better contribute to the objective of achieving sustainable development?

3. Friends of the Earth considers that most new development should take place within existing settlements where there is access to facilities, jobs, homes and public transport or provision is made for these. Like London, growth pressures are acute in the South East where many places already struggle to meet their own development needs, let alone accommodate London's.
4. It is important to consider London in the wider context of the UK as a whole where measures are urgently required to rebalance the economy and foster sustainable patterns of development with a focus on reducing commuting, prioritising regeneration and renewal (including making better use of existing property) and addressing the mismatch between homes and jobs and the type of homes provided (a major factor in commuting).

Opportunities to sustainably accommodate London's needs within the south east and beyond are likely to be limited.

c) If so, is there a realistic prospect that such an approach in London and the wider South East could be delivered in the context of national policy and legislation?

5. As stated above there is a need to consider London in the wider context of England and more broadly the UK. The lack of coherent regional and strategic policy mechanisms outside London makes it hard to plan for sustainable patterns of development and facilitate growth that is environmentally sustainable. It therefore makes sense for London to seek to meet development needs within its boundaries in as sustainable manner as possible, albeit subject to caveats, policies and measures discussed in this statement.

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