



Examination in Public of the draft London Plan: Written submission by CPRE London (1142) to the EIP Panel, December 2018

SPATIAL DEVELOPMENT STRATEGY - OVERALL SPATIAL DEVELOPMENT STRATEGY

Matter 12: Is the broad spatial distribution of housing and employment development proposed in the Plan, including between inner and outer London, justified and would it contribute to the objective of achieving sustainable development particularly in terms of minimising the need to travel and maximising the use of sustainable transport modes; building a strong, competitive economy; creating healthy, inclusive communities; and respecting the character and appearance of different parts of London?

1. CPRE London welcomes the broad spatial distribution of housing and employment development proposed in the draft Plan. We support the strong emphasis on making the best use of land and in particular promoting the better use of previously developed land. We believe this provides a solid foundation for achieving sustainable development, including reducing the need to travel and increasing the use of sustainable transport modes.
2. The need to promote more sustainable transport within London is critical, not least in relation to the vital importance of reducing air pollution and associated health impacts. We believe there should be a more ambitious approach to realising the land use benefits of achieving the Mayor's target of 80% of journeys to be by active or sustainable modes by 2041. Modal shift on this scale will result in the release of considerable amounts of land - we call it 'grey space' - currently devoted to the use of the private car, including extensive areas of surface car parking, land-hungry roundabouts and excessively wide highways. Action is already underway in many parts of London to reclaim some of this land for alternative uses. We have recommended changes to Policy H1 to make explicit reference to the redevelopment of 'excessive and redundant road space'.
3. As recognised in our submission on Matter 11, CPRE London believes it is also important that the diverse and distinctive character of London's local areas is safeguarded in promoting urban intensification. While the reference to local character in Policy D1B4) is welcome, overall the draft Plan gives insufficient consideration to the protection and enhancement of this diverse local character. A 2010 study by SAVE and English Heritage found that there had been a significant erosion of character in a number of London suburbs, although in others character had been successfully safeguarded. There is a risk that future development will erode the distinctive character of existing neighbourhoods by creating homogenous 'anywhere' places unless greater attention is paid to this diversity. The 2010 report recommended a 'characterisation' approach

to address this¹. Statutory neighbourhood plans and informal community plans could play a useful role in describing the distinctive character of local areas.

4. To address these weaknesses, we believe greater weight should be attached to the Character Map of London (figure 7.4) contained in the draft London Plan. In addition, Policy D1A should be amended to refer explicitly to the role of neighbourhood plans and the need for the 'form and layout of place' to 'reflect and enhance local character and distinctiveness.' We also believe the first sentence of Policy HC1 on 'Heritage conservation and growth' should be amended to read 'Boroughs should, in consultation with Historic England, and other relevant statutory organisations, local community and neighbourhood planning groups, develop evidence that demonstrates a clear understanding of London's historic environment, local character and distinctiveness.'

CPRE London

December, 2018

¹ SAVE / English Heritage, *Rediscovered Utopias: Saving London's Suburbs*, 2010, p.22.