

The London Mayor
City Hall
The Queen's Walk
LONDON SE1 2 AA



1 December 2016

Dear Sir

REVIEW OF THE LONDON PLAN: A CITY FOR ALL LONDONERS

The Society agrees that the London Plan needs to be updated, providing as it does the important basic framework for the individual Boroughs to produce their Local Plans and Policies. Additionally, the new Plan needs to spell out more clearly what the GLA/Mayor is going to do itself, and what works and initiatives and subsidies etc it will be undertaking.

The Plan should also try to be more precise on timescales for achieving each objective, and needs to give clear and precise instructions to the Boroughs on what they should (in strategic terms) be doing in their own Plans.

In our view the following subjects are among those that need to be addressed.

OPEN SPACE PROTECTION: Strengthen local plan protection policies and prevent loss, and emphasise that Metropolitan Open Land (MOL) is in every way to be treated and protected as though it was Green Belt (GB). Some GB and MOL lands are currently the responsibility of the individual Boroughs, and consequently are subject to severe financial limits.

The result is that these strategic assets are falling below standard. An alternative approach should be considered, where all MOL and GB lands would be financed direct from the London-wide GLA precept, with individual Boroughs then being responsible for implementation and upkeep.

HERITAGE PROTECTION: Protection of local character needs to be given more emphasis. This is particularly so with the push for new housing seemingly taking precedence over all other issues.

We do not want to see the nature of our localities and environment damaged by the slavish adherence to “numbers at all costs”. Excessive Density and building height need to be subservient to the character that local people feel is appropriate for their town.

A Heritage Grant scheme for small scale repairs by householders could be self financing if HMG could be persuaded to take it on board. We can provide details of such a scheme if required.

URBAN DESIGN: The Plan should concentrate on promoting local character, scale, height, heritage and relationship to the locality, and not stray into the subjective area of “style”.

Establishing a set of clear neighbourliness standards for daylighting, sunlighting, and privacy distances (varying of course from the centre to the suburbs) would go a long way to helping the development industry (and the Boroughs) to achieve development that does not adversely affect lands and properties nearby.

URBAN FORM: There needs to be an understanding in the Plan of the pattern of distinct Communities that make up the whole of London. Far from being a single metropolitan entity, local people feel affinity with “their” town, and want to see it as individual and special and with its own character. The map of these communities, produced by Arthur Ling of the LCC in the 1950’s, could be reviewed and form the unique structure for the future Plan. Concentrating public facilities in these natural centres of community, locating infrastructure between them rather than through them, could be a challenge. But community buy-in is an essential part of the plan process.

HIGH BUILDINGS: It is clear that the present policy-driven and “negotiation” approach that has been in place for more than 40 years, simply does not work. Specific zones for high buildings, exclusion zones, defined heights zones are needed. The present unworkable view protection corridors to St Pauls and Westminster need to be replaced, as they are not fit for purpose.

AFFORDABLE HOUSING: The existing approach seems both inadequate and prone to manipulation by the development industry. The emphasis on so-called “viability” seems to be misplaced. Additionally, it is not just the availability of land, but the availability of the new housing to low income occupants that needs to be addressed.

Some form of Land value capture is needed, to facilitate development and return increased value to be used in public works, infrastructure, social housing, schools and so on. Publicly-owned land needs to be used for direct public benefit, only sold off for example subject to 40% affordable housing being provided. Currently most public lands seem to be sold off for maximum profit, and the subsequent development has affordable housing quotas that are well below the desired level.

AIR POLLUTION: Specific measures are needed to deal with polluted areas, not just vague “aims” and “policies”. Allocation of financial resources would be a part of this, but also there should be consideration of, for example, pedestrianising local shopping streets where pedestrians congregate, and diverting traffic to less vulnerable roads.

NOISE POLLUTION: A programme of alleviation measures, sound barriers etc needs to be an integral part of the transport budget. Locally for example, the noise from the busy A3 penetrates widely into the residential hinterland, as well as what should be the quietness of Wimbledon Common and Richmond Park. Such solid noise barriers are a commonplace in many other European countries. To have a newly planted line of rose bushes (an example locally) between the A3 and the adjoining houses is difficult to take seriously.

LIGHT POLLUTION: A co-ordinated approach to metropolitan lighting is needed, including street light design with proximity controls, illumination levels on shopfronts, floodlighting, and the controlling of light spillage. Out-of-scale high lighting standards in local centres need to be replaced, and the Boroughs need legal powers to require new developments to accommodate street lighting fittings on their facades, as is the case with the City Corporation.

ENERGY: Local power generation is needed to lessen the need for energy importation via the national grid, with specific aid for town centres and other big sites to generate CHP energy locally. The wholesale relocation of overhead power lines into below-ground mains would mean that the visual pollution by pylons, with their high loss of energy to air, should decline.

PEDESTRIANISATION SCHEMES for main local high streets, need active support to re-energise local town centres. The Broadway in Wimbledon has potential for such a pedestrianisation scheme, but to achieve such schemes, public acquisition of land for alternative roads with new facilities for public transport etc may be needed. Individual Boroughs need GLA/Mayoral support both via policy and finance, with many town centres' future viability and success dependent on such initiatives.

TRANSPORT: Licensing and traffic measures should favour low energy/low pollution vehicles, including for residential parking schemes throughout London. Local shops need local bays with parking-free times to support them. Low speed zones need to be encouraged extensively in residential and shopping areas, linked to the opportunities for better vehicle speed controls available when autonomous vehicles arrive. Yellow lining using narrower bands, being already legal in certain areas, needs to be brought in for general use.

MAJOR INFRASTRUCTURE: Crossrail 2 is a significant project for the Wimbledon area, and is currently being appraised by HMG. We believe that it needs to respect local environmental quality in its inherent design, as well as in the disruptive 10+ year build process. Current indications however are that the cheapest scheme (with significant downsides on acquisitions and demolition) may be preferred to a possibly more expensive scheme that is less damaging to the locality. Airport expansion decisions are evolving, but there seems to be the potential for continuing the study of the estuary option, so that in future years, Heathrow could becoming the centre of a major new employment zone/city in the west (as Canary Wharf might become in the east). Its airport role involving the over-flying of much of London, might then be reviewed. Flooding seems to be a growing issue: should the new Plan preclude all new residential development in flood prone lands, with a programme of flood alleviation measures put in place for existing housing? When will a second Thames barrier be required?

These are some of the issues that, as an active amenity society with a thousand members, we feel need to be addressed by the emerging London Plan.

Yours faithfully

Chris Goodair
Acting Chairman, Planning Committee

cc: London Forum