

CPRE London response to the Further Alternations of the London Plan (FALP)

Key points

CPRE London's [Campaign for a Liveable London](#) has been examining the issue of neighbourhood liveability. We have consulted with built environment and community practitioners, policy makers, as well as reviewed a number of case studies across the capital. Our response to the Further Alternations on the London Plan (FALP) is based on the emerging findings of that research.

According to three independent indices London is not in the top ten in terms of liveable city rankings (Mercer, EUI and Monocle) globally. CPRE London would like London to be even more ambitious and work towards making our capital one of the most liveable cities in the world. This means addressing key challenges, such as:

- Sustainable transport objectives that reduce air pollution and car dependency, promote public transport, pedestrian and cycling enhancements;
- Promote the supply of affordable, inclusive and good quality housing and social infrastructure;
- Investing in enhanced landscape and green infrastructure quality, multiple functions and connectivity;
- Promoting health and wellbeing, and enhancing community assets.

We particularly highlight two key issues which need to be strengthened in the FALP:

1. Providing sufficient good quality and affordable houses to meet London's housing needs not just market demand

Developers are not building sufficient numbers of affordable homes, creating an imbalance towards the premium end of the housing market. This is not their 'fault' as such; they are simply responding to an over-inflated market. London boroughs need greater capacity to take a stronger lead in diversifying the type of housing supply so that London not only delivers a sufficient number of homes but actually meets local needs, particularly in regard to affordability and quality. Boroughs also need greater capacity to borrow and powers to help reduce developer risk, recruit local suppliers and labour, as well as encourage smaller builders.

CPRE London has consulted various groups who broadly agree with the need for a much stronger emphasis on the social housing supply, as well as on the need to re-skill and free-up the local government sector to deliver a more diverse housing market. This should include stronger scrutiny and incentives to enhance the quality of the growing Private Rental Sector.

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This will also require further support for 'alternative' housing models (not just self-build but also co-housing, cooperatives and increased tenant governance in housing) as well as increased partnerships or 'collaborative construction' between developers, boroughs and housing associations, local businesses, community actors and residents themselves.

2. Planning positively for London's green lungs

Green infrastructure, particularly the Green Belt and Metropolitan Open Spaces, should to be protected as vital to the quality of life of Londoners and the future resilience of the capital. How our green (and blue) infrastructure is managed is also essential to the delivery of key ecosystem services, such as flood defence, air quality, the 'urban heat island' effect, biodiversity corridors, as well as amenity, accessibility, health and wellbeing benefits.

Noting the uncertainty in future London population growth projections (i.e. as to whether the population will follow an steady growth path or adopt a 'cyclical pattern' with a drop off at some point and numbers falling back), CPRE London maintains there is sufficient land availability within the Mayor's housing targets to provide for London housing needs by 2036. We have examined the housing targets and proposals for high street and estate regeneration, opportunity and intensification areas, housing zones and 'new garden suburbs'. Taking these proposals into account, along with the release of stalled sites (with planning permission), empty properties, as well as conversion of some disused retail and office spaces, we find that London has sufficient space to meet the projected targets within the boundaries of Greater London.

London boroughs, however, are facing potentially conflicting requirements from National Planning Policy Framework and the London Plan to produce five to ten-year rolling housing targets (and additional percentages) while at the same time as being asked to **plan positively for the beneficial use of Green Belt and Metropolitan Open Land**. New resources (human, political and financial) need to be established to ensure clear protection and enhancement of precious green spaces and particularly London's Green Belt, as well as to stimulate the delivery of the All London Green Grid (ALGG) across London. CPRE London welcomes the Mayor's continued promotion of developing brownfield sites first and preventing encroachment on London's Green Belt and protected open spaces (e.g. policies 1.1 B a, 2.18, 7.16, 7.17, 7.18) but call for a greater clarity about its protection and a clear reference to the effective delivery of the All London Green Grid. The London Plan and forthcoming Infrastructure Strategy need to state clearly how they will support and resource strategic green infrastructure planning to deliver multiple benefits for all Londoners.

CPRE London: Specific comments and suggested text

Ch1. Demographic challenge

Investing in community assets

In recognition of the Localism and Social Value Acts, there needs to be stronger emphasis in the London Plan on so-called ‘soft infrastructure’, notably in relation to promoting assessment (such as community and cultural asset mapping) and supporting wider uptake of community assets.

Recommendation	
Additional text to para.1.40	<i>“..more social infrastructure, ranging from schools, colleges, and universities, theatres, museums and libraries,[through health facilities to spaces for local groups and places of worship. This also includes a need to assess and promote cultural and community assets”</i>

Promoting London’s ‘liveability’

Over the last year CPRE London has been examining the question of liveability in London, particularly in relation to housing developments. According to a combined review of the Mercer, Economist Intelligence Unit (EUI) and Monocle ‘liveable city’ indices London is not in the top ten and we could and should be¹. Whilst it is clear that London meets many aspects of a liveable city, including on its strong emphasis on green infrastructure, we can go even further to enhance everyday quality of life at both neighbourhood and city-wide levels. This includes addressing challenges such as: such as: Sustainable transport objectives that reduce air pollution and car dependency, promote public transport, pedestrian and cycling enhancements; promote the supply of affordable, inclusive and good quality housing and social infrastructure; enhance landscape and green infrastructure quality, multiple functions and connectivity, promoting health and wellbeing, and enhancing community assets.

Recommendation	
Additional text to Policy 1.1 C	<i>“...so that London should become one of the most liveable cities in the world, and be:.... “</i>

¹ Combined Mercer, EUI and Monocle indexes <http://www.cityclock.org/15-livable-cities-world/>

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Ch2. London Places

Outer London

Repurposing of suburbs: CPRE London supports Policy 2.7, with regards to enhancing town centres and higher density housing around high streets and transport nodes, if it delivers more affordable and good quality homes that people need. We argue that this requires active dialogue and partnership with local businesses and communities to ensure a positive planning process.

Car dependency – cutting suburban car culture: Air quality in parts of Outer London continues to exceed European air quality standards, largely as a result of Nitrous Oxide and particulate pollution from road vehicles and the UK government has recently been fined as a result of this poor air quality. This is linked to an estimated 4,000 deaths a year in London due to respiratory diseases. The Mayor needs to further encourage boroughs to explicitly plan to limit car dependency and raise awareness of the reasons why. Further more the revised Planning Practice Guidance **6-004** and **6-007** state '*The distribution and design of new development and the potential for servicing sites through sustainable transport solutions, are particularly important considerations that affect transport emissions. [Sustainability appraisal](#) should be used to test different spatial options in plans on emissions*'. This should be reflected in the revised London Plan.

Sustainable transport: Outer London transport systems should seek to promote sustainable travel in its broadest sense, not only public transport, but also cycling and walking, in accordance with the NPPF paragraph 17 which calls for authorities to: '*actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling*' as well as paragraphs 29, 30, 32 & 35.

Transport user hierarchy: The revised PPG **26-008** states: "*The transport user hierarchy should be applied within all aspects of street design – consider the needs of the most vulnerable users first: pedestrians, then cyclists, then public transport users, specialist vehicles like ambulances and finally other motor vehicles*". This should be reflected in the revised London Plan.

Parking standards: There is currently a conflict between the mini-Holland programme and car promotion in outer London Boroughs. It is vital that boroughs take account of their mini-Holland status when setting car parking standards (currently only PTAL is deemed relevant). Department of Transport research indicates that clear parking standards are an effective lever to improve cycle uptake².

Recommendation	
Additional text to Policy 2.7 Outer Londoner: Economy	<i>h"... and especially higher density affordable and good quality housing, including the use of compulsory purchase process to assemble sites, and providing recognition and support for specialist as well as wider town functions. It also requires the involvement of local community and businesses to ensure the effective repurposing of suburban areas, that meets the needs of local people'</i>
Additional text to Policy 2.8 Outer London: Transport	<i>A The Mayor will, and boroughs, and other stakeholders should recognise and address the distinct orbital, radial and qualitative -sustainable transport needs... ...f working to improve public -sustainable transport access to job opportunities in the Outer Metropolitan Area, supporting reverse commuting, and enhancing the</i>

² Local Transport Note 02/08 Cycling infrastructure Design
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/3808/ltn-2-08.pdf

	<p>key role played by efficient bus services, cycle and pedestrian routes in outer London</p> <p>h“... more active traffic management, including demand management measures, road improvements to address local congestion, sustainability appraisal (in accordance with PPG 6-007), clear car parking policy and guidance which reflects greater dependence on the private car promotes awareness of the transport user hierarchy (in accordance with PPG 26-008), the links between poor air quality and motor vehicle use and actively encourages less car dependency.</p>
Amended text to para 2.36	<p>A flexible approach should therefore be taken to implementation of parking standards (see Policy 6.13 and Table 6.2) to enhance outer London attractiveness as an office location, and where appropriate, to help secure the vitality and viability of its town centres. In neighbourhoods with low public transport accessibility (PTAL 0-1), potential to increase cycling, particularly for trips to the nearest town centre and rail stations, should be considered when applying to residential parking standards should be applied flexibly.</p>

Strengthening the delivery of the All London Green Grid

CPRE London welcomes the Mayor’s Policy 2.18 in supporting the delivery of a multi-functional network for Green Infrastructure, including the need for local Green Infrastructure Strategies linked to biodiversity strategies. We believe there needs to be a clear reference to supporting the further resourcing of this work, noting that many councils are facing further public sector cuts, and that this is an area at risk.

Recommendation	
Additional text to Policy 2.18	<p>B. the Mayor will pursue the delivery of green infrastructure...and Lee Valley Authority. To assist delivery the Mayor will examine alternative financial options, such as the adoption of an Green Infrastructure levy, green municipal bonds, carbon offsetting, flood defence/risk insurance investment via BIDs</p>

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Ch3. London housing requirements

Local government: capacity, integration and unlocking land

CPRE London welcomes the Mayor in continuing to focus on brownfield sites first and intensification of sites to help boost housing supply. We further welcome the recommendation for developers to provide appraisals “*demonstrating that each scheme maximises affordable housing output*” (para 3.71). In the face of on-going public sector cuts however, there is a growing need to further equip local government to take a lead in stimulating affordable housing delivery in their boroughs.

Local government powers: The Local Government Association and London Councils have called for greater powers to unlock stalled sites, e.g. Compulsory Purchasing Orders (CPO), and to set time-bound commitments for development on sites with planning permission. We support this (see also London Plan Policy 2.7 h) along with the call to impose additional charges on empty homes. Policy 37 of the London Housing Strategy also seeks greater local government and GLA financial autonomy. We would like such increased powers to be used to support housing that is better linked with Local Plan and infrastructural priorities, to assist the creation of new social housing, wider adoption of participatory budgeting (see below), as well as establish tax incentives to kick-start developments on stalled and brownfield sites.

The Mayor should apply continued pressure on the national government to remove the borrowing cap on Local authorities via the Treasury’s Housing Revenue Account to help councils take on the some of the development risk (LGA estimates the complete removal of the cap could double the amount of new homes councils could provide). CPRE London also supports the recommendation to further incentivise development on Previously Developed Land (PDL, or ‘brownfield sites’) such as through reducing the Community Infrastructure Levy and VAT charges imposed on these sites. We also call for a review to consider introducing a Land Value Tax.

Linked bids: CPRE London welcomes Policy 3.15 calling for greater coordination of housing and wider infrastructure and service provision. As the Farrell Review has highlighted there is a need for much stronger focus on place making, as well as for greater community involvement. London Boroughs need to be supported in adopting integrated approaches, such as allowing the right to bid across different sectors to pool budgets and targets in a complementary way. For example, the [North Lewisham Links Strategy](#) establishes good cycling and pedestrian routes to connect possible new development sites with community facilities such as schools and colleges, town centres, parks and public open spaces.

Land transparency: There is a need for greater transparency about public and private land use and availability for housing. The GLA’s ‘London Land and Property’ database currently reports on GLA, Met Police, London Fire brigade and TfL owned land. The database could be extended to include London Borough owned land, as well as potentially private land data.

Recommendations	
Amended text to para 33 G (plus new H)	<i>‘SHLAA report and updates in the London Plan Annual Monitoring Report, as well as to regularly report available sites to the London Land and Property Database’</i> H: The Mayor supports the use of Compulsory Purchasing Orders by boroughs for stalled sites with planning permission, when development

	<i>does not occur within 2 years of granted permission, as well as additional charges for long-term empty properties (over six months), and the application of tax incentives and reduced CIL to further realise housing supply on brownfield sites, industrial land and appropriate vacant properties.</i>
<i>Amended text to para 3.71</i>	<i>'Boroughs are encouraged to review and bring forward surplus land in their own ownership to maximise the contribution to affordable housing, including through reporting to the London Land and Property Database, and the provision...'</i>
<i>Amended text to para 3.85a</i>	<i>'The Mayor is already working to bring forward individual stalled sites. Boroughs are encouraged to do the same with smaller small sites, to include reporting public land to the London Land and Property Database. The Mayor will continue to press for greater local financial freedoms to help stimulate affordable housing supply, including seeking the removal the HRA borrowing cap for local government, introduce tax incentives for brownfield sites, as well as undertake a review of introducing a Land Value Tax.'</i>
<i>Additional text to Policy 3.15</i>	<i>'The Mayor encourages London boroughs to adopt integrated bidding approaches to ensure new developments are matched with sufficient community services, amenities and infrastructure, particularly that they are accessible for pedestrians, cyclists and public transport'</i>

Private Rental Sector (PRS)

PRS scrutiny: CPRE London welcomes the emphasis on family housing, older persons and students in the London Plan, as well as higher standards in the private rental sector. A number of studies (Future for London, Crisis and others) have shown that the sector is growing in London but many PRS landlords are failing to deliver: affordable rental accommodation; longer term lets; or good repair and responsiveness to tenants. The London Plan could support wider adoption of compulsory registration of PRS landlords, at a fee, and support independent inspections e.g. London Borough Enfield are introducing a registration scheme for PRS landlords, where registered landlords pay a £500 fee and receive mandatory inspections (paid for by the fee)³.

<i>Recommendations</i>	
<i>Amended text to Policy 3.8 B a1</i>	<i>...''the planning system provides positive and practical support to enhance sustain the contribution of the private rental sector.</i>
<i>Amended Text to Policy 3.11 Affordable Housing Target</i>	<i>'...diverse intermediate housing sector, 70% 60% of the affordable housing provision should be for social and affordable rent and 30% 40% for intermediate rent or sale'</i>
<i>Amended text to para 3.54</i>	<i>'...sustainable neighbourhoods. The mayor will encourage the adoption of London Borough PRS registration schemes to enhance the standards and scrutiny of private landlords.'</i>

Affordable market choice and supply

³ London Borough of Enfield PRS presentation:
http://www.enfield.gov.uk/downloads/file/8806/summary_of_additional_and_selective_licensing_of_private_rented_homes_in_enfield-a_consultation_report
 Full report (see pages 23, 29-31) :
http://www.enfield.gov.uk/downloads/file/8694/additional_and_selective_licensing-consultation_document.

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London needs to create more incentives to build homes not just for the premium housing market. It should provide homes for key workers and those workers on lower pay who are vital for an economically vibrant and resilient global city⁴. Various measures have been suggested to boost construction but much greater emphasis is still required on opening up supply at the social and affordable ends of the housing market.

Social housing minimum threshold: Social rented housing should be separated from intermediate housing, as the affordable housing rate (80% of market rate) has become increasingly unaffordable for a large proportion of people on low to middle income brackets. While we welcome the extension of intermediate housing eligibility level to £80,000 for families, along with index linking to the London Annual Monitoring Report, CPRE London argues that there should be a separate threshold for social housing eligibility to recognise the challenges of affording even 'intermediate housing' costs for lower income groups. We also believe the balance of social /affordable and intermediate housing provisions needs to return to 2008 levels (i.e. 70%:30% rather than 60%:40%) in recognition of house price and rental cost increases as compared to average salary increases.

Parcelling-up public land: CPRE London welcomes the London Housing strategy proposals to free up more public land and old industrial sites. In that process and in the creation of the new 'Homes Zones' and 'new garden' suburbs CPRE London would like to see the London Plan encourage boroughs to open up the market to smaller builders/developers, community groups and self-build opportunities. For example, in the **Vauban District**⁵, Freiburg City Council insisted that a large site (an old army base) be divided into plots of varied size and character. It resulted in a site with 2,000 homes of medium density (50 dwellings per ha) with high environmental standard. The land was sold to resident-led 'construction communities' and small builder/developers. Each plot was fairly small (usually 10-20 homes in an apartment block or terrace) and sometimes there were stipulations on the sort of homes that should be built e.g. homes for families or apartments for older people. Two thirds of the homes were built by construction communities / cooperatives and a third by private builders/residential developers. The overall costs for construction were lower than with private developers – typically about 25% cheaper. This enabled people on lower incomes to become home owners. The financial risks were shared by all the members of each construction community; but they also shared the financial benefits. About 10% of the 25% cost saving was the profit that a large developer would normally make on a project like this.

Council tax bands: In 2005 Wales revalued its council tax levels, based on 2003 property values. The thresholds for each of the bands were increased to reflect growth in property values and a new band was added for properties worth more than £424,000. Northern Ireland has also changed its bands in 2007 (to 2005 property values). In England the bands still remain at 1996 property value levels, which for London is increasingly irrelevant. According to a review by Shelter "*Linking the rate of tax more closely to property values could help tackle housing wealth inequalities by ensuring that those with high levels of housing wealth pay a greater share in tax*". Shelter's report called for six new bands above and below the current Band H £360,000 threshold and changing the ratios between the tax bands. The levy would be

⁴ Andrew Carter, Guardian Housing Network, June 2013 <http://www.theguardian.com/housing-network/2013/jun/20/high-house-prices-damage-businesses-economy>

⁵ Vauban District: <http://www.selfbuildportal.org.uk/vauban-freiburg>

tied in proportion with house prices across all house price ranges, rather than just the lower ranges. Shelter argue that “*The resulting increase in council tax revenue from the higher bands would generate significant resources, which could be used to ensure that those on lower to middle incomes did not experience an increase to their charges*”⁶. A number of parities who CPRE London interviewed support this proposal, especially for London, and as such we call on the Mayor to seek new powers to revise the council tax banding for London, if not for England as a whole.

Recommendations	
Amended text to para 3.57	<i>...‘make a significant contribution to the evolution of London vernacular. This will include encouraging London Boroughs to identify plots and parcel up land for smaller builders, co-housing, cooperatives and self-build opportunities – in relation to the regeneration of estates, opportunity areas, Housing Zones, repurposing of suburbs and other housing developments on public land, along with high street renewal, and release of industrial sites, as outlined in the London Housing Strategy.</i>
Amended text to para 3.61	<i>‘Households who’s annual income range £18,100 to £36,000 should be eligible for new social housing, and £36,001 to £66,000 should be eligible for new intermediate homes</i>
Amended text to Policy 3.9 Mixed and balanced communities	<i>“The Mayor will also press on the government to allow London to review and redefine council tax bands and establish a fairer allocation of cost for households”.</i>

Social Infrastructure: participation, community and cultural assets

We agree with the Mayor that there are considerable opportunities to increase London’s density in the ‘right’ places, and as a part of that we call for the greater involvement of local people in the process of intensification and re-design to ensure the creation of good quality liveable neighbourhoods. There is a need to put people back at the centre of new housing development, regeneration and ‘place-making’ in general, involving local residents, businesses and neighbourhood groups in the processes of planning, design, and long-term management.

Investing in community-led governance: There is a need for a clear policy commitment to provide additional resources for establishing neighbourhood governance arrangements within the different housing developments e.g. Arm’s Length Management Organisations (ALMOs), community land trusts, cooperatives, residents / tenants associations etc. This is vital to help ensure an effective community voice as part of housing development processes.

Neighbourhood forums are slowly on the rise in London, particularly where a London Borough values and actively supports such groups e.g. Hackney and Camden. Significantly they can often focus on the public realm and the interface with the built environment, provision of amenities and infrastructure. There remains a considerable need to increase awareness, understanding and capacity to engage with the planning system to enhance the ability of such groups to take a proactive role in housing in their local area. Numerous **housing cooperatives** across London e.g. The Vine Cooperative (Vauxhall, Lambeth) and Coin Street (Southbank, Lambeth and Southwark), illustrate that lasting neighbourhood liveability can be achieved through greater community ownership. Housing cooperatives tend to remain fairly

⁶ Shelter (2009) Rethinking Housing Taxation: Options for Reform
https://england.shelter.org.uk/__data/assets/pdf_file/0003/224472/Rethinking_Housing_Taxation.pdf

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small-scale but perhaps that is part of their strength, and could be further encouraged. **Co-housing** and **Community Land Trusts** e.g. St Clements Hospital site, are alternative models that are still in at the early stages of development in London. However, they offer opportunities for greater tenant ownership and control. For example the Andover Estate (Islington) is working towards adopting the Community Land Trust model and residents have a wealth of ideas to enhance and improve the public areas around the estate e.g. local food production, new community-owned recreational facilities. **Housing associations** are shifting towards partnerships with the private sector to deliver new affordable social housing alongside private rental and ownership schemes. It can be a tricky balance of interests, especially during drawn-out development and regeneration processes. It is vital associations re-emphasize the voices of their residents. Poplar Harcar offers an example of what can be possible, e.g. their [Youth Empowerment Board](#) gives 16 - 25 year olds a forum to present their views about the neighbourhood, as well as training and personal development courses to help residents engage.

Housing quality and co-design – community / residential involvement: Supporting early and ongoing 'user' engagement (taking the conversation to people rather than expecting people to come to you) about community needs and preferences should be a central objective of housing developments. CPRE London argues that this approach needs to be consistently, to deliver a shift from 'NIMBY' protest towards partnership and co-design in housing delivery. The aims should be to seek joint solutions for delivering good quality well-designed homes that knit-in well with surrounding neighbourhoods.

Promoting community and cultural assets: We also welcome Policy 3.16 regarding enhancing social infrastructure. Councils need to further encourage developers and contractors to employ local labour and use local supply chains, as well as allow mechanisms that target strengthening of social capital, London Boroughs are taking a varied approach to responding to their Localism Act (2011) obligations as regards to the monitoring and support of Community Asset Transfer (CAT), including housing. For example [LB Camden](#) and [LB Lewisham](#) keep a public record of CATs whilst others like LB Tower Hamlets and LB Newham currently do not. A more consistent approach of monitoring and support by London Boroughs needs to be further encouraged by the Mayor. The 'Homes for London' board might play a role in that process, through reviewing uptake within different boroughs.

Participatory budgeting: Although still relatively in its infancy in the UK, participatory budgeting has been applied effectively as a means to build community ownership and wellbeing outcomes. The Participatory Budgeting Unit (PBU) refers to the steady (albeit small-scale) take up of this approach by housing associations in partnership with Arm's Length Management Organisations (ALMOs): *"Given that tenants will now be responsible for paying rent directly, involving them in decisions about their homes and estates is even more important – [Participatory Budgeting] is ideal in making the connections between rent paid and quality of service on estates, and encouraging regular rent payments."* The unit refers to the example of **Cartrefi Conwy**, which operates across Conwy County in North Wales. They adopted a 20/80 model where 20% of the budget is for community grants, and also used to inform a wider community priority setting process. It also informs how the remaining 80% of the environmental budget is spent on core service provision, enabling tenants to see a greater link between their priorities and what's delivered on their estates⁷. A small-scale London

⁷ Participatory Budgeting Unit - Housing models <http://www.participatorybudgeting.org.uk/models/housing>

example is at **Hackney Homes**, where they offer an ‘Environmental Improvement Budget (EIB) for Tenant and Resident Associations to improve communal areas such as site and ground maintenance, signage, electrical work and for play areas (grants are worked out by the number of properties multiplied by £25.25). Such initiatives could happen at a much wider level in Housing Associations, neighbourhood forums etc.

Recommendations	
Amended text to Policy 3.16	<p>C... ‘multiple use of premises should be encouraged. Furthermore, the wider uptake of Community Asset Transfer, Right to Bid and participatory budgeting should be promoted.</p> <p>E... Boroughs should ensure that adequate social infrastructure provision is made to support new developments, As a part of this they should support an assessment of Community and cultural assets, through mapping exercises, to capture Community Asset Transfer and identify further opportunities for community bids.</p> <p>(new) G. The Mayor will promote the wider uptake of participatory budgeting in social infrastructure and housing provision, including by housing associations. The Mayor will identify resources to help strengthen the capacity in resident and tenant groups to effectively engage in social infrastructure provision.</p>
Amended text to Policy 3.5 C	<p>“...should be conceived and developed through [delete ‘an’] participatory and effective co-design processes, which involve local residents, workers, businesses and passive users. “</p>
Amended text to para 3.88	<p>‘...identify and analyse existing social infrastructure, cultural and community assets, including their types, location, use, capacity, quality and accessibility...’</p> <p>‘joint strategic needs assessment, and to examine whether housing-related Community Asset Transfer and Right to Build opportunities are emerging and consider how to encourage wider London Borough support and community uptake’.</p> <p>‘identify future needs using data such as population forecasts, school roll projections, joint strategic needs assessment, community asset mapping.’</p> <p>‘identify funding and delivery mechanisms including for joint delivery, participatory budgeting and community governance e.g. via neighbourhood forums, sources of funding, and identification of potential sites</p> <p>‘...monitor and review the delivery of services and facilities, including through undertaking ‘Community Asset Transfer’ review and cultural asset mapping exercises,</p>
Amended text to policy 3.9 Mixed and balanced Communities. A	<p>‘...sense of responsibility for, and identify with, their neighbourhoods. This should include early and on-going dialogue with residents and local users. They must be supported by effective, inclusive and attractive design... ‘</p>

Sustainable transport

NPPF commitment: New housing should seek to promote sustainable travel in its broadest sense, not only public transport, but also cycling and walking, in accordance with the NPPF paragraph 17 which calls for authorities to: ‘*actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling*’ as well as paragraphs 29, 30, 32 & 35.

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Parking standards: It is important to set car parking standards as a maximum level in order to actively encourage car free and car light development, in accordance with department for transport guidance. Department of Transport research indicates that clear parking standards are an effective lever to improve cycle uptake⁸.

Transport user hierarchy: The revised PPG **26-008** states: "The transport user hierarchy should be applied within all aspects of street design – consider the needs of the most vulnerable users first: pedestrians, then cyclists, then public transport users, specialist vehicles like ambulances and finally other motor vehicles". This should be reflected in the revised London Plan

Recommendation	
Amended text to para 3.30	Where transport assessments other than PTALs can reasonably demonstrate that a site has either good existing or planned sustainable travel public transport connectivity and capacity
Amended text to para 3.31	Car parking provision should be in accordance with not exceed the standards
Amended text to Policy 3.5 Quality & design of housing developments	B ...taking into account the needs to children and older people. The transport user hierarchy should be applied in all aspects of street design in and around housing developments in accordance with PPG 26-008.

⁸ Local Transport Note 02/08 Cycling infrastructure Design
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/3808/ltn-2-08.pdf

Ch. 6 Transport

Promoting sustainable travel

A core planning principle of the NPPF calls for the *'fullest possible use of public transport, walking and cycling'* (see NPPF paragraph 17 as well as 29, 30, 32 & 35). The Further Amendments to the London Plan fails to amend the Plan to support these principles but in many instances, may actively prevent it

Walking: The strategic map of long-distance walking routes is not relevant to over 99% of current or potential walking trips in London, which tend to be short and focused in areas of dense development. There is a need to plan for a step-change in conditions around stations that will encourage a surge in trips, particularly in the Central Activities Zone after completion of Crossrail and Thameslink. Due to the existing density of movement, particularly during peak hours, the only way to provide for these additional trips is through restrictions on private motor traffic.

Cycling: Currently the plan makes no significant proposals after 2022 (Table 6.1) and there is a need for longer term strategic planning supporting an integrated cycling network throughout London, or the wider roll out of initiatives such as the Mini Holland programme.

Outer London: There is currently a conflict between the mini-Holland programme and car promotion in outer London Boroughs. It is vital that boroughs take account of their mini-Holland status when setting car parking standards (currently only PTAL is deemed relevant). Department of Transport research indicates that clear parking standards are an effective lever to improve cycle uptake⁹.

Green infrastructure and transport: CPRE London believes that a strong and ambitious policy of dense network of multi-functional green corridors *and* quarters (similar to that in Paris) is required. This would tie in with clear policies of motor traffic reduction, better integration of green corridors and active travel. Currently there are few green routes of any length in inner London other than along water features, few routes out into Green Belt.

Sustainability appraisal; the first edition of the Planning Practice Guidance (PPG) published in March 2014 includes policies **6-004** and **6-007** which state: *'The distribution and design of new development and the potential for servicing sites through sustainable transport solutions, are particularly important considerations that affect transport emissions. [Sustainability appraisal](#) should be used to test different spatial options in plans on emissions'*. This should be reflected in the revised London Plan.

Transport user hierarchy: The revised PPG **26-008** states: *"The transport user hierarchy should be applied within all aspects of street design – consider the needs of the most vulnerable users first: pedestrians, then cyclists, then public transport users, specialist vehicles like ambulances and finally other motor vehicles."* This should be reflected in the revised London Plan.

Integrated cycling and green network: The **PPG 26-009** also states: *'integrated into a wider green network of walkways, cycleways, open spaces and natural and river corridors'*. This should be reflected in the revised London Plan.

Air pollution: With the EU commencing legal proceedings against continued breaches by the UK of limit values, the case for stronger policy is overwhelming. In any event the Plan fails to lock in reductions in motor traffic from modal shift, while ignores the fact that even low

⁹ Local Transport Note 02/08 Cycling infrastructure Design
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/3808/ltn-2-08.pdf

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(carbon) emission vehicles cause significant amounts of particulate pollution from tyre and brake wear.

Parking standards: The weakening of car parking standards would lead to many adverse outcomes. Research commissioned by the Department for Transport demonstrates the importance of maximum parking standards to make travel plans effective and secure modal shift. Tying the parking standards to Public Transport Accessibility Levels (PTAL) ignores the potential to plan-in increased cycling modal share into new developments. More nuanced standards are needed now to take account of the recognition of the role potential of cycling.

Road building: There should be a return to the 2004 London Plan policy limiting road-building. It is notable that motor traffic levels have not increased since that time and London should continue to adopt that approach. London must take urgent action to reduce motor vehicle traffic and air pollution and as such we oppose references to road extension and new roads in **policy 6.12**.

Recommendations	
Amended text to Policy 6.1 Strategic approach	<p>A ...i promoting walking and cycling by ensuring...</p> <p>(New) k promoting an 'integrated into a wider green network of walkways, cycleways, open spaces and natural and river corridors' in accordance with PPG 26-009.</p> <p>B ...that takes into account the transport user hierarchy different roles of roads for neighbourhoods and road users in ways that support the policies in the Plan promoting sustainable public transport and other sustainable means of transport.</p>
Amended text to Policy 6.9	A... c...fund the transformation of up to four Outer London borough town centres into cycle-friendly 'mini-Hollands', with a view to further roll-out beyond 2022.
Amended text to para 6.35	Planning briefs and masterplans should clearly demonstrate how new developments will contribute to creating a high quality, connected environment for cyclists, and include this objective as a part of sustainability appraisals.
Amended text to Policy 6.12	<p>' A The Mayor supports the need for limited improvements to London's road network, with regards to whether in improving or extending existing capacity, or providing new links, to address clearly identified significant strategic or local needs.</p> <p>B 'In assessing proposals for improving increasing road capacity, including new roads, the following criteria should be taken into account:</p> <p>a the contribution to London's sustainable development and regeneration including improved connectivity</p> <p>b the extent of any additional traffic and any effects it may have on the locality, and the extent to which congestion is reduced</p> <p>c how net benefit to London's environment, including air quality, can be provided</p> <p>d how conditions for pedestrians, cyclists, public transport users, freight and local residents can be improved</p> <p>e how safety for all is improved.</p> <p>C Proposals should show, overall, a net benefit across these criteria when taken as a whole. All proposals must show how any dis-benefits will be mitigated.</p>

Ch. 7 London’s living spaces and places

Green Belt – planning positively

CPRE London welcomes the London Plans’ commitment to improving the London Green Belt’s quality and positive benefits to Londoners (Policy 7.16 and para 7.55), noting the NPPF states. “local planning authorities should **plan positively to enhance the beneficial use of the Green Belt**, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.” (NPPF paragraph 81). It also states; “The planning system should contribute to and enhance the natural and local environment by: protecting and enhancing valued landscapes”. (NPPF Paragraph 109)

According to the Mayor’s housing targets for opportunity and intensification areas, Housing Zones, new ‘garden’ suburbs, high street and estate regeneration, as well as opening up of brownfield sites and conversion of empty properties there is more than sufficient land to provide for London’s housing needs by 2036, without having to encroach on protected land.

It is clear however that housing development pressures are increasing in London and land value distortions may put pressure on London Boroughs to deliver these targets on Green Belt or Metropolitan Open Land (MOL) where they appear ‘cheap’ in comparison to brownfield sites. Raising the question of whether boroughs will apply ‘exceptional circumstances’ or open up protected land following a boundary review? Our assessment of London boroughs indicates that nine London Boroughs have already reviewed their Green Belt and Metropolitan Open Land boundaries. Positively, six councils have only made minor boundary changes to designate developed sites and two of them have added new land as a part of that process (Lewisham and Sutton). There remains a number of councils who are still in the process of reviewing their local plans and therefore we remain concerned about how they will resolve land designations and future development applications (CPRE London, 2014).

Greater clarity on green belt and MOL protection: There is a need to clarify ambiguities as regards protections for Green Belt and Metropolitan Open Land. The interpretation of the National Planning Policy Framework (NPPF) of the definitions of ‘inappropriate development’ and ‘very special circumstances’, leave development on London’s large green spaces at the discretion of individual authorities, when weighing up what benefits of the original intended purposes of the land (including to maintain their openness, permanence and preventing urban sprawl, NPPF Para 87). Guidance, along the same lines of the former PPG2, should be included within the London Plan to clarify the consideration of extensions, infilling and redevelopment of brownfield or existing properties within Green Belt land and Metropolitan Open Land.

Recommendation	
Amended text to Policy 7.16 (B)	<p><i>B ...Development will be supported if it is appropriate and helps secure the objectives of improving the Green Belt as set out in national guidance. Brownfield sites within Green Belt should be treated and remain subject to development control policies for the Green Belt. With regard to infilling of sites a proposal should:</i></p> <ul style="list-style-type: none"> <i>a) have no greater impact on the purposes of including land in the Green Belt than the existing development;</i> <i>b) not exceed the height of the existing buildings; and</i> <i>c) not lead to a major increase in the developed proportion of the site.</i> <p><i>As regards the redevelopment of a site PPG2 stated that sites should:</i></p> <ul style="list-style-type: none"> <i>a) have no greater impact than the existing development on the openness of the Green Belt and the purposes of including land in it,</i>

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	<p><i>and where possible have less;</i></p> <p><i>b) contribute to the achievement of the [beneficial] use of land in Green Belts;</i></p> <p><i>c) not exceed the height of the existing buildings; and</i></p> <p><i>d) not occupy a larger area of the site than the existing buildings (unless this would achieve a reduction in height which would benefit visual amenity).</i></p> <p><i>A proposed brownfield redevelopment within the Green Belt should also take account of: the character and dispersal of proposed redevelopment. The location of new buildings should be decided having regard to the openness of the Green Belt and the purposes of including land in it, the objectives for the use of land in Green Belts, the main features of the landscape, considering the site 'as a whole' and in the light material issues like visual amenity, and traffic and travel implications.</i></p>
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Public open space - optimising Green Infrastructure

Strategic cross-borough green infrastructure planning will help deliver greater benefits. How they are managed and interact is vital to the delivery of key ecosystem services (such as flood defence, air quality, heat island effect, biodiversity corridors), as well as amenity, accessibility, health and wellbeing benefits.

Green infrastructure investment: The All London Green Grid SPG outlines an approach towards working at a landscape level, which requires strategic thinking across London Borough and Greater London boundaries. Green Belt and Metropolitan Open Land policy should relate to these wider objectives. This also requires sufficient resources (human, political and financial) to effectively deliver their objectives, and to monitor and manage the sites in a more strategic way. The London Plan and forthcoming Infrastructure Strategy need to clarify how they will resource positive investment in green infrastructure across London; not simply through funding small pocket parks and Sustainable Urban Drainage Systems (SUDS), but also investing in connecting up green infrastructure to maximise the benefits for Londoners and more widely. This could include opening up the Lee Valley 'Levy' mechanism to support funding of all twelve ALGG areas. Alternative financial mechanisms should be considered to ensure its effective ongoing delivery e.g. green municipal bonds, carbon offsetting, flood defence/risk insurance investment via BIDs.

Green infrastructure and climate change: The NPPF highlights the importance of radical reductions in Greenhouse Gas Emissions as well as of adaptation. The Plan is unsound on mitigation of transport emissions but also, in terms of reducing the heat island effect, (with regards to adaptation): as such a much greater greening of London is needed.

Recommendation	
Amended text to Policy 7.17	<i>D.d...'it forms part of a Green Chain, and contributes a link towards delivering the All London Green Grid SPG green infrastructure network...'</i>
Amended text to Policy 7.18	<i>A The Mayor supports the creation of new open spaces in London to ensure satisfactory levels of local provision to address areas of deficiency and the effective delivery of the All London Green Grid (ALGG) SPG. The Mayor will consider alternative financial options to support the effective delivery of the ALGG, such as the adoption of an Green Infrastructure levy, green municipal bonds, carbon offsetting, flood defence/risk insurance investment via BIDs.</i>

	<i>C. d. ...ensure that open space needs are planned and resourced in accordance with green infrastructure strategies, towards the delivery of the All London Green Grid, to deliver multiple benefits.</i>
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Community participation and place shaping

In response to chapter 3 of the FALP CPRE London calls for greater opportunities of community partnership, ownership and co-design, with regards to housing and regeneration (see above). This equally applies to ‘place shaping’. We support the principles of Lifetime Neighbourhoods in terms of creating walkable neighbourhoods, choice, and fostering social capacity and interaction (para 7.4A.) and welcome the ‘Build your own home’ programme to enable the community ‘Right to build’.

Neighbourhood Forums as a formal entity are still in their infancy in London however and need to significant additional support from the Mayor and London boroughs if more resident and community groups are going to come forward to propose the creation of further groups and neighbourhood plans. Furthermore, there is a need for greater ‘post-build’ community engagement and assessment to ensure the effective on-going management and maintenance of a new development.

Recommendation	
Amended text to para 7.6	<i>Neighbourhood plans are one mechanism for both boroughs and community-led groups to agree on local priorities, including those for investments through the infrastructure levy. Neighbourhood Forums’ are still in their infancy however and should be further supported by London boroughs. These and other groups, such as tenants and residents associations, local businesses and Business Improvement Districts, housing cooperatives and others need to be engaged further through participatory processes of co-design, co-ownership and budgeting.</i>
Amended text to Policy 7.2 An Inclusive Environment (D)	<i>D...‘when drawing up masterplans, area planning frameworks and development briefs. They should ensure a clear policy of user-assessment and engagement once a new development is completed, to support effective ongoing management and maintenance of a site. This should also include mapping of community and cultural assets’.</i>
Amended text to para 7.9	<i>The Mayor will revise the Supplementary Planning Guidance ‘Accessible London: Achieving an inclusive environment’, including to address the need for greater post-build user assessment and engagement’</i>
Amended text to Policy 7.5 Public Realm (B)	<i>B...‘Treatment of the public realm should be informed by the heritage and cultural values of the place, where appropriate, including through conducting community and cultural asset mapping.’</i>
Amended text to Policy 7.6 Architecture (B)	<i>B... ‘h meet the principles of inclusive design, management and maintenance’</i>

Sustainable transport

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CPRE London strongly supports Policy 7.15 that enables designation of Quiet Areas and spaces of relative tranquillity. This is important to increase possibilities for people to seek respite from the noise of daily life in an increasingly populated city.

Crime and transport safety: Vehicle crimes such as speeding and careless driving kill more Londoners than all other crimes put together. Public surveys by the Home Office of the public's biggest concerns about anti-social behaviour have shown that speeding is the biggest single issue. Designing out such crimes, such as through psychological traffic calming and filtered permeability, can reduce the need for enforcement, as well as road deaths and serious injuries. Pedal cycles are legally classed as vehicles.

Motor traffic and air quality: The emphasis on reducing motor traffic by promoting smarter choices is wholly inadequate. Freeing up space in this way simply generates new traffic until previous levels of congestion are restored. The failure of the Congestion Charge Zone, where taxi traffic quickly increased to fill the space left by reduction in cars, shows why this policy does not work.

Recommendation	
Amended text to POLICY 7.3 DESIGNING OUT CRIME	<i>A Boroughs and others should seek to create safe, secure and appropriately accessible environments where crime and disorder, and the fear of crime, including traffic offences, do not undermine quality of life or community cohesion.</i>
Amended text to Policy 7.14	<i>B...(New) f ensure street design around developments promotes sustainable modes of transport and minimises motor traffic.</i>

Ch 8 Implementation, Monitoring and Review

Smart citizens: London citizens have much to offer by way of new ideas and innovation. The Mayor should seek to positively engage with them in the future planning of London. A ‘smart London’ consists of its smart public and any new technologies should actively target their involvement.

Green infrastructure promotion: it is vital that the All London Green Grid is properly tracked and consistently monitored, as such we recommend a revised target for increasing urban greening.

Recommendation	
Amended text to para 8.2.	<i>Voluntary and community sector groups, as well as the wider public.</i>
Amended text to para 8.6B	<i>The potential of new technologies, which will, with the active involvement of London’s citizens, over time provide opportunities to makes London’s infrastructure more efficient and mitigate the adverse impacts of demand growth,</i>
Amended text to Policy 8.2	<i>D. ...and other sustainable public transport improvements should be given the highest importance... E...and air quality, green infrastructure and social infrastructure...</i>
Amended text to para 8.13	<i>The improvement of air quality, the provision of green infrastructure and social infrastructure...</i>
Amended text to Table 8.2	<i>Increase the total area of green infrastructure roofs in the CAZ and outer London. Relevant plan objectives: 2, 3, 4,5, 6,7</i>

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For further information contact:

Rosalie Callway, Senior Policy and Research Officer

Rosalie@cprelondon.org.uk

Tel: 0207 253 0300

www.cprelondon.org.uk