



Campaign to Protect
Rural England
LONDON

**Draft Further Alterations to the London Plan
(Spatial Development Strategy for Greater London) May 2006
Initial draft for consultation with the London Assembly and GLA Functional Bodies**

Initial comments by CPRE London (July 2006)

These comments are submitted to the London Assembly for the purpose of informing its response to the Mayor's Draft Further Alterations to the London Plan, published in May 2006.

CPRE London either supports or makes no comment on the vast majority of the proposed alterations. The comments below are limited to the proposed alterations that we feel do warrant comment at this stage. Comments are limited to the merits of the proposed alterations themselves rather than being addressed to the question of what additional alterations might be recommended.

In summary, we detect a potentially significant shift in policy in the following respects:

- the apparent intention to weaken protection of greenfield land within the Green Belt, especially against the development of freight transfer installations;
- the apparent intention to weaken the emphasis on the suburbs as a location for new and intensifying developments;
- recognition that the indiscriminate economic growth of London can adversely affect the economic prospects and growth of other major cities in England (the 'core cities');
- the intention to weaken the stance against airport expansion in south-eastern England outside London; and
- greater recognition of the fact that London exerts influences on its surrounding regions to the effect that it exerts pressure on environmental resources (which should include land);

Headings and sub-headings below are those of the consultation document.

PREAMBLE AND INTRODUCTION

Page (vii): The consultation document proposes that following is deleted:

“London faces a radical challenge, which requires a radical policy response. This should ensure that its rapid expansion of population and jobs within a constrained area” (emphasis added)

We note deletion that this may imply an intention to relax development controls within the Green Belt. If this is indeed the Mayor’s intention, it should be made explicit. If it is not the Mayor’s intention, then unequivocal assurance to that effect should be included within the appropriate policies and the supporting text.

CHAPTER 1: POSITIONING LONDON

New Policy 1.1: What is meant by London’s growth “supporting” the core cities? The issue in this regard is about London not growing *at the expense of* the core cities, but this is not mentioned in the Policy. The emphasis of the Policy is therefore different from the supporting text at paragraph 1.11.

New Policy 1.2: What are these ‘strategic issues of common concern’? They should be identified and should include those impacts that London has on the surrounding regions, including:

- urban out-migration;
- housing demand;
- demand for airport expansion;
- commuter traffic;
- economic development; and
- export of waste.

Paragraph 1.23: It is incorrect to describe the London-Stansted-Cambridge-Peterborough corridor as a ‘regeneration area’. It is a ‘Growth Area’. The report of the Inspector to the East Of England draft Regional Spatial Strategy (June 2006) stated that the *‘LSCP Growth Area has little coherence in functional geographical or economic terms’*.

CHAPTER 2: THE BROAD DEVELOPMENT STRATEGY

Overarching spatial policies for London

Page 29, Paragraph 2.2

Page 39, Policy 2A.6

Paragraphs 2.17, 2.18, 2.21

It is unclear why the reference to access and sustainability for the suburbs has been deleted. The deletions are not fully compensated for in the proposed new text.

In many instances, use of the word 'suburb' or 'suburban' appears to have been abandoned in favour of, for example, the terms 'outer London' or 'inner and outer London'. This seems unnecessary and, indeed, unhelpful. The term 'suburb' or 'suburban' is not pejorative. It should be retained because it has a far clearer and more precise meaning than 'inner and outer London' or even 'outer London' (not all of outer London is suburban in character).

Page 38, Paragraph 2.15

It is unclear why the reference to increasing the attractiveness and capacity of town centres has been deleted. The deletion is not fully compensated for in the proposed new text.

CHAPTER 3B: WORKING IN LONDON

Paragraph 3.129i: What is meant by the 'logistics system' 'extending into the wider city-region'? Does this mean that the Mayor intends to develop freight transfer and distribution facilities in the Green Belt?

CHAPTER 3C: CONNECTING LONDON

No reference is made to the prospects for **Biggin Hill Airport** being enabled to be used for fare-paying passengers. This is, however, very much in prospect and the Mayor's position could be set out in the London Plan.

Paragraph 3.175: The 'environmental effects' should be identified in full and should include: noise, road traffic, air pollution and consumption of land. CPRE objects to the support given to the expansion of Stanstead and Gatwick, irrespective of transport capacity limitations being addressed.

CPRE London
6/7/06