



Draft Further Alterations to the *London Plan* (September 2006)

Comments by CPRE London (December 2006)

Introduction

CPRE London exists to promote and encourage the improvement and protection of the English countryside, in particular through influencing the way that land and other natural resources are used in Greater London. To that end, we are naturally concerned directly with the protection of London's rural areas within the Metropolitan Green Belt against unnecessary encroachment by built development of all kinds. To achieve that protection, it will be important that land within London's urbanised area is used efficiently, according to sensible priorities and, where it has become derelict or under-used, is brought back into beneficial use.

However, possibly the greatest impact that London has on the countryside is caused by the very substantial net loss of London's population into the surrounding regions, leading to the continued expansion of urban areas outside London as well as substantial concomitant built development. This 'urban exodus' from London into the surrounding regions is currently running at around 80,000 individuals per annum *net* - a very substantial figure. CPRE is therefore potentially concerned with all policy that influences - or could influence - the likelihood that individuals will choose to move away from (or, indeed, into) London. Factors which have a significant bearing on the net rate of urban outmigration from London - and which should be addressed through the *London Plan* - include:

- the availability of sufficient housing to meet needs across a range of housing types (especially family-sized housing); and
- general 'quality of life' issues, including transport accessibility, the quality of the urban environment, fear of crime and the quality of local public services and amenities.

These objectives give CPRE London a clear locus to comment on a very wide range of policy areas within the *London Plan* and our comments in response the proposed further alterations are made in that context. Earlier this year, we took part in the public consultation in respect of the 'early alterations' of the *London Plan* and participated in

the Examination-in-Public.

Summary

We support the vast majority of the proposed alterations, frequently because they are likely to have a beneficial effect on a range of 'quality of life' issues. In particular, however, we support:

- proposals to enhance the quality, amenity and use of land within the Green Belt; and
- the proposed amendments to Table 3A.2 - the residential density matrix.

However, we object strongly to the proposals to:

- dilute, in various ways, the objective of reducing the need to travel;
- support substantial growth within the 'London, Stansted, Cambridge, Peterborough corridor' beyond urban London;
- allow 'three or four' large intermodal freight transfer facilities to be built in London ahead of the need for them being confirmed;
- waive any requirement that previously-developed sites should be considered in preference to greenfield land for the siting of new intermodal freight transfer facilities;
- support for expansion at Stansted and Gatwick airports;
- unequivocal support for '*the development of national rail routes that relieve London of through freight*' without any reference to any well-developed proposals;
- require boroughs to - without caveat - '*support the provision of strategic rail-based intermodal freight facilities*'; and
- require boroughs to '*identify broad areas where the development of specific renewable energy technologies are appropriate*' without clear reference to an assessment at a strategic level as to how many of each kind of facility - and of what size - is required.

In addition, we propose that the objective of Policy 3D.8 - Green Belt - (page 176) should be supported by a target within Table 6B.1 that there should be no loss of greenfield land within the Green Belt or Metropolitan Open Land.

At several points below, we suggest that the Mayor should be invited to explain why certain proposed deletions are necessary. We proposes that the Examination-in-Public would be the appropriate opportunity for those explanations to be given.

The headings and sub-headings below are taken from the consultation document.

PREAMBLE AND INTRODUCTION

Page iv We question the need to delete the following passage and we propose that it should be retained:

‘London thus 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 maintains and enhances its economic and business efficiency, is accompanied by strong improvements in the quality of life and environment and greater social and economic inclusion. All policies must be inter-related, incorporating sustainable economic and social development, environmental protection and enhancement, high quality design and the development of London’s culture.’

Page x We support the addition of the twelfth indent.

Page xi We support the insertion of the third indent.

Page xiv We support the insertion of point xiii.i.

Page xv We support the insertion into Paragraph xxi.

Objective 1 (Page xvii) We support the insertion into the first indent.

Objective 2 (Page xix) We support the insertion of the fifth and eighth indents.

Objective 3 (Page xx) We support the insertion into the fourth indent of this section (page xxi).

We support the insertion of the fifth indent into this section (page xxi).

Objective 4 (Page xxi) We support the insertion of the third indent into this section (page xxii).

Objective 5 (Page xxii) We support the insertions into this section, with the exception of the proposal to change *‘Minimise the need to travel’* to *‘Reduce the need to travel by car’*. That alteration would be a clear dilution of the current policy, both with regard to the extent to which travel should be reduced and with regard to reducing demand for transport modes other than cars. The Mayor should be invited to explain why it is necessary to dilute the policy in this way.

Objective 6 (Page xxiii) We support the proposal to change ‘dealing’ with flood risk to ‘managing’ flood risk in the third indent of this section (page xxiv).

Chapter 1: POSITIONING LONDON

New Policy 1.3 (page 8) We support this policy with regard to supporting the regeneration and growth of the Thames Gateway, but, as indicated elsewhere in these comments, we have serious misgivings about the desirability of developing the London, Stansted, Cambridge, Peterborough corridor beyond urban London and we therefore propose that this Policy is modified to make it applicable to the Thames Gateway exclusively.

Paragraph 1.23 (page 8) We object to the insertion of the reference to the London, Stansted, Cambridge, Peterborough corridor. At the time of writing (October 2006) the entire concept is subject to possible amendment through the regional spatial planning process for the East of England Region and has been rejected by the Inspector to the Examination in Public of RSS6 - Regional Spatial Strategy for the East of England.

Chapter 2: THE BROAD DEVELOPMENT STRATEGY

Policy 2A.1 (page 25) We support the insertion into the third indent of this section (page 26).

We object to the deletion of the reference to locations '*that are accessible to town centres, employment, housing, shops and services*' from the fourth indent (page 26).

We support the insertion of the eighth indent of this section (page 26).

New Policy 2A.1i (page 27) The third indent appears to contain an error. As written, it refers to North London and South-East London. Presumably, this should read North-*East* London and South-East London.

We support the insertion of the eleventh and twelfth indents of this section (page 29).

Policy 2A.2 (page 32) We support the insertion of the fifth indents of this section.

Policy 2A.5 (page 37) The meaning of the propose modified text in the preamble is unclear: what is meant by using the network of Town Centres '*as the basis for policy development and delivery within them*'?

We support the insertion of the first and second indents; the insertion of the second introductory paragraph and the insertions and changes in the subsequent list of indents.

We object to the deletion of the final three indents of this policy (page 38). The Mayor should be invited to explain why it is necessary to remove those references.

Paragraph 2.16i (page 39) We support elements of the apparent intention of this proposed paragraph. However:

i) rather than referring to '*maximising public transport use*', it should advocate maximising the proportion of journeys being undertaken by public transport;

ii) rather than referring simply to reducing car-based forms of activity, it should refer to reducing car-use (which would include reducing car-based forms of activity).

Policy 2A.6 (page 39) We support the insertions to this policy.

We object to the deletions to the third indent (page 41) and the subsequent two paragraphs. The Mayor should be invited to explain why it is necessary to remove the requirement for '*promoting better access to centres, employment and community facilities*'.

Paragraph 2.18 (page 41) We support the changes to this paragraph.

Paragraph 2.21 (page 42) We object to the deletion of this paragraph. The Mayor should be invited to explain why these deletions are necessary.

Paragraph 2.22 (page 44) We object to the proposed deletion from this paragraph. The Mayor should be invited to explain why these deletions are necessary.

Paragraphs 2.20iii to 2.24 (page 42 etc) We support the proposed changes to this section

Paragraph 2.25 to 2.25iii (page 46 etc) We support the proposed changes to this section

Paragraph 2.30 (page 48) We challenge the inclusion of the London, Stansted,

Cambridge, Peterborough corridor in the key diagramme. At the time of writing (October 2006) the entire concept is subject to possible amendment through the regional spatial planning process for the East of England Region and has been rejected by the Inspector to the Examination-in-Public of draft RSS6.

We object to the deletion of the references to central London, town centres and the suburbs from this paragraph. The Mayor should be invited to explain why it is necessary to remove those references.

Chapter 3A: LIVING IN LONDON

Paragraph 3.15vi (page 57) We support the inclusion of this paragraph, but we propose that it should propose that higher density development should also be possible where good public transport connectivity and capacity is planned, rather than simply where it is already in place.

New Policy 3A.4i (page 59) We support the inclusion of this policy.

Policy 3A.5 (page 59) We support the amendments to this policy, but the term ‘capable’ should be defined: it should be made clear that it refers to the terms of the density matrix at Table 3A.2 and its supporting policies.

Paragraphs 3.23 to 3.25i (pages 60-61) We support the amendments to this section.

Policy 3A.7 (page 65) We support the amendment to the fourth indent.

Paragraphs 3.46 to 3.46i (page 69) We support the amendments to this section.

Paragraph 3.54i (page 70) We support the amendments to this section.

Paragraph 3.76 (page 80) We support the amendments to this section.

Policy 3A.15 (page 80) We support the amendment to this policy.

Policy 3A.19 (page 84) We support the amendment to this policy.

Paragraph 3.88 (page 85) We support the amendments to this section.

Policy 3A.21 (page 85) We support the amendment to this policy.

Policy 3A.23 (page 89) We support the amendments to this policy.

Chapter 3B: WORKING IN LONDON

Paragraph 3.117 to 3.120 (page 100 etc) We support the amendments to this section.

Policy 3B.2 (page 101) We support the amendments to this policy.

Paragraph 3.125 (page 103) We support the amendments to this section.

Policy 3B.4 (page 104) We support the amendments to this policy.

Paragraph 3.124 to 3.124iii (page 104 etc) We support the amendments to this section.

Policy 3B.5 (page 105) We support the amendments to this policy.

Paragraph 3.127i (page 106) We support the amendments to this section.

Paragraph 3.129ii (page 107) We question the assertion that ‘there is particular need to secure strategic provision for ‘logistics’. Chapter 5 does not offer evidence for such provision under the sections on ‘Strategic Industrial Locations’. It is not clear whether it is a genuine current need or an anticipated need arising out of projected levels of economic activity. We therefore object to the inclusion of the reference to strategic provision in this paragraph.

Policy 3B.12 (page 115) The meaning of the following is unclear:

'the Mayor will...provide the spatial context to coordinate the range of initiatives necessary to [etc]'

This section should be re-cast so as to be clearer as to its intended meaning.

Policy 3C.1 (page 122) We support the amendments to this policy.

Policy 3C.2 (page 123) We support the amendments to this policy. However, the reference to the *London Plan*'s ‘priorities’ should be

clarified. It is not clear whether those ‘priorities’ are defined as such in the *London Plan* and, if so, where.

Policy 3C.3 (page 124)

We support the amendments to this policy, with the exception of the deletion of ‘enhanced’ from the fourth indent. The Mayor should be invited to explain why it is necessary to remove the reference to enhancing bus services.

Paragraph 3.163 to 3.163i (page 125)

We support the amendments to this section.

Paragraph 3.164 (page 126) We object to the deletion of the references to:

'improving the environment and functioning of town centre locations'

and

'reducing the overall need to travel by providing improved local connections by walking, cycling and more sustainable modes of motorised transport'.

The Mayor should be invited to explain why it is necessary to remove those references.

Paragraph 3.167 to 3.168i (page 128 etc)

We support the amendments to this section.

Policy 3C.8 (page 131)

It is unclear what is meant by the aviation industry ‘*meet[ing] its full environmental and external costs*’. What ‘costs’ is the Mayor referring to? Is the Mayor advocating some form of tax? If so, what tax? Moreover, how does the Mayor propose that the funds thus generated would ‘meet the costs’ of, for example air or noise pollution? Without these questions being addressed, the statement appears glib. The Mayor should be invited to provide answers to each of these questions.

Paragraph 3.174 (page 131) We object to the proposed support for expansion at Stansted and Gatwick airports.

The mayor should provide an explanation as to what is meant by the ‘satisfactory’ mitigation of environmental impacts and, indeed, which environmental impacts are being referred to here.

We support the proposed deletion from Policy 3C.6. Growth and regeneration in the Thames Gateway does not require further runway capacity in the South East.

**Paragraph 3.182i to 3.183i
(page 135)**

We support the insertions into this section. However, the notion that ‘projects should provide on-going benefits’ (3.182i) should be established in policy rather than merely in supporting text.

Paragraph 3.186 (page 138) While we fully support the Crossrail proposal, that proposal has not yet been agreed by the Government and it is therefore inappropriate for the *London Plan* to refer to the vital contribution that Crossrail ‘will’ make. It should refer to the contribution that Crossrail ‘would’ make.

**Paragraph 3.189 to 3.194
(page 139 etc)** We support the amendments into this section.

Policy 3C.14

If long-distance traffic is not excluded from the Thames Gateway Bridge, then the potential regeneration and development benefits would, to at least some extent, be offset by the harm that could be caused by increased traffic levels in the areas around the bridge’s approaches. Until the mechanism for controlling traffic generation has been shown to work effectively (which it has not yet been), it is therefore inappropriate for the *London Plan* to claim without caveat that the crossings ‘will’ achieve regeneration and development benefits. Moreover, given that none of the listed schemes have yet been agreed, it is wrong to refer to what they ‘will’ achieve anyway.

Policy 3C.16 (page 144) We support the insertions into this policy.

Policy 3C.24 (page 154) While we support in principle the removal of freight from London’s roads, schemes which achieve that could potentially have substantial adverse consequences in respect of traffic generation or land-take. For example, a new rail crossing across the River Thames outside the M25 (a ‘lower Thames crossing’) would be likely to lead to a road crossing that would bring about substantial development pressure in North Kent. It is inappropriate for the *London Plan* to support unequivocally ‘*the development of national rail routes that relieve London of through freight*’ without any reference to any well-developed

proposals. It is not sufficient simply for the word 'sustainable' to be inserted into the policy's preamble. It would be more appropriate for the *London Plan* to support the development of freight by-pass routes *in principle* and to stipulate that individual proposals will be assessed on their merits taking into account wider sustainable development objectives.

Policy 3C.25 (page 156)

Although not included in the proposed alterations here, it is inappropriate for the *London Plan* to say, in the absence of specific proposals, that boroughs should, without caveat, 'support the provision of strategic rail-based intermodal freight facilities'. It would be more appropriate for the *London Plan* to encourage boroughs to support *proposals* for the development of freight by-pass routes, subject to assessment of their merits taking into account wider sustainable development objectives.

Paragraph 3.218 (page 156) We strongly object to the proposal to delete the requirement that:

'Any site promoted as a suitable location [for a strategic rail intermodal freight facility] must meet operational and strategic planning objectives and should be located wholly or substantially on previously developed land.'

The proposed replacement text is vague:

'New locations should meet strategic planning and environmental objectives.'

A requirement merely that proposals should meet 'environmental objectives' could arguably be satisfied simply by freight being allowed to be transported by rail rather than by road. The proposed alteration to Paragraph 3.218 would therefore effectively encourage the sequential approach to be entirely ignored in respect of strategic rail intermodal freight facilities, with the likely result that substantial greenfield areas within the Green Belt will become developed. The Green Belt would then be likely to be further eroded through the development of associated economic development. It is entirely unsatisfactory that no justification whatsoever has been offered for proposing that the sequential approach should not be followed in respect of strategic rail intermodal freight facilities.

Moreover, the only justification that has been offered for the encouragement of *'three or four large multi-modal freight facilities on or close to the periphery of London'* is a reference to a study undertaken some time ago by the former Strategic Rail Authority. The Mayor should be invited to explain whether that need is current or projected and, if the latter, then evidence should be required showing that the need is indeed still likely to arise.

Chapter 3D: ENJOYING LONDON

We support all proposed amendments to this chapter. In particular, we support the proposed alterations to Policy 3D.3 and 3D.13:

Policy 3D.8 (page 176) We strongly support the insertion of the requirement for encouragement of *'positive uses for the Green Belt that realise the potential to improve the quality and accessibility of the land while meeting its statutory purposes'*.

We propose, however, that this section should refer to the *landscape* quality of the land as well as simply 'quality' of the land. The latter could be construed as referring merely to agricultural soil quality.

We propose that Policy 3D.8 should be altered so as to advocate that there should be *no change* to the boundary of the Green Belt within London. It should further make it clear that the Mayor does not accept that boundary changes within London - allowing development of Green Belt land - can be compensated for by extending the outer limit of the Green Belt.

Policy 3D.13 (page 188) We strongly support the insertions into this policy, promoting

- the Green Arc concept;
- accessibility;
- environmental management; and
- flood management.

Chapter 4A: CLIMATE CHANGE AND LONDON'S METABOLISM

Policy 4A7 (page 204) We object to the final paragraph of this policy. It is wrong

to require boroughs to ‘*identify broad areas where the development of specific renewable energy technologies are appropriate*’ without clear reference to an assessment at a strategic level as to how many of each kind of facility - and of what size - is required across London and, broadly, what the most appropriate locations are for each. That, indeed, is the proper role of strategic planning. If that assessment has been made within the Mayor’s Energy Strategy, then the Policy should be explicitly tied to the recommendations in that regard within the Energy Strategy. If that is not done, then there is a danger that the wrong sites, or the wrong number of sites will be identified within LDFs and, moreover, those sites will be made unnecessarily unavailable for other uses.

**Paragraph 4.18 to 4.31
(page 205 to 236)**

We support the proposed amendments to this section.

Paragraph 4.32 (page 236)

We object to the deletion of this paragraph. The Mayor should be invited to explain why it is necessary to remove those references.

Chapter 4B: DESIGNS ON LONDON

We support all proposed amendments to this chapter.

Chapter 4C: THE BLUE RIBBON NETWORK

We support all proposed amendments to this chapter.

Chapter 6 IMPLEMENTING THE *LONDON PLAN*

We support all proposed amendments to this chapter.

APPENDIX 1

Table 3A.2 (page A59)

We support all proposed amendments to this table

Table 6B.1 (page A87)

Target 1: We support the proposed target for at least 96% of new residential development to be on previously developed land. However, we propose that the objective of Policy 3D.8 - Green Belt (page 176) should be supported

by a target within Table 6B.1 that there should be no loss of greenfield land within the Green Belt or Metropolitan Open Land.

Target 2: We propose that target 2 is extended to from 'over 95%' to 100% of residential development.

**CPRE London
December 2006**