



Campaign to Protect
Rural England
LONDON

Reviewing the London Plan: Statement of Intent from the Mayor (December 2006)

Comments by CPRE London (February 2006)

Introduction

1. CPRE London welcomes the opportunity to comment on the Mayor's early proposals for reviewing the *London Plan*. We positively support the vast majority of the proposals in the consultation document and, below, we highlight only those issues that are of particular interest to CPRE. In addition, we suggest a small number of additional priorities. Sub-headings and paragraph numbers refer to those of the consultation document.

Part 2 - Reviewing the Key Challenges

2. **Paragraph 29:** We concur with the Mayor in identifying the main challenge in spatial planning for London as being to accommodate growth in population and jobs in a 'sustainable' way. We would add, however, that the *London Plan* should recognise that 'sustainable' in this context means protecting and enhancing the environment - including the character of the landscape - both within and beyond the Greater London boundary.

3. **Paragraph 36:** We accept that the main driver of London's population growth will be natural growth. We also recognise, however, that the Mayor intends to reduce the rate of net out-migration from London through, for example, improving 'liveability' and ensuring that more and better family housing is provided in London. We strongly support that objective, but, if the Mayor is successful in that regard, it may lead to additional population growth beyond that which is currently predicted. The *London Plan* - and the underlying population projections - should recognise that potential effect and set out to accommodate it.

4. **Paragraph 76 & 79:** We welcome acknowledgement that:

'the current approach to "the suburbs" lacks sufficient focus to address the particular issues faced in many parts of Outer London, for example declining town centres and transport accessibility'.

and

'development [of suburban town centres] has been held back by a comparatively restrictive approach...which has resulted in a failure to develop the area to make the most of its key selling point - larger shops with a unique range of goods and services on offer.'

5. The *London Plan* should explicitly promote appropriate intensification of some suburban areas and enhanced public transport provision as important elements of the response to these problems.

Part 3 – Key Areas for Review

6. **Paragraph 87:** We welcome acknowledgement that:

‘London must continue on the path towards becoming a more compact city.’

and

‘growth will be inhibited unless...the supply of commercial floorspace, housing, relevant skills, adequate transport and a high quality environment [are dealt with].’

7. **Paragraph 89:** We welcome acknowledgement that:

‘A more compact city enables the more effective use of scarce resources, including land’.

From vision to objectives

8. **Paragraph 93:** We support the ‘six fundamental objectives’ and suggest that they remain unchanged.

London as a World City

9. We welcome the statement that the Mayor proposes to:

‘underscore the importance of securing an efficient transport system for international, national, regional and more local movement with the highest priority being given to the early completion of Crossrail’.

London’s economy

10. We welcome the statement that the Mayor proposes to:

‘provide a clearer framework to manage the stock of industrial land including conversion of surplus capacity to other priority uses, especially in East London whilst ensuring that the strategic demand for sites for industry and other related activities is met’.

11. The forthcoming draft *London Plan* should include policies to maximise the efficiency with which land is used for employment-related development, including optimising plot ratios and applying stringent car-parking standards.

Housing

12. We strongly welcome recognition of the need to for more and better provision of family housing, including developing internal space standards and the provision of related social and other infrastructure, especially transport and play space. In particular, we welcome

the acknowledgement that family housing provision and mix is linked to imposed out-migration.

13. In addition, we support the Mayor's intention to:

'improve planning for infrastructure and related services, both to provide for population growth and to deal with deficits in current provision, especially of transport and provision for children, childcare facilities, play space and healthcare provision'.

14. In this connection, however, we recommend that the *London Plan* addresses the question of *intermediate* housing specifically - as opposed to 'affordable housing' generally - and its potential role in meeting the need for more and better family housing in London.

15. **Brownfield target** - We recommend that the section of the *London Plan* that addresses housing provision includes a clear target that 100% of new housing in London should be built on sites within the current urbanised area. This is a key policy to support the first fundamental objective: *'accommodating London's growth within its boundaries without encroaching on open spaces'*. All sites for new housing should be previously-developed other than where the loss of non-Green-Belt urban greenspace is compensated for by the reclamation of derelict or underused urban land.

Transport

16. The consultation document does not confirm that the objective of reducing the need to travel should be a key underlying principle of the *London Plan*. That is an unfortunate omission which should be made good in the forthcoming draft.

17. In the interest of promoting the redevelopment of the Thames Gateway and optimising the provision of additional housing there, the *London Plan* should also make reference to the need to upgrade the East London Transit and Greenwich Waterfront Transit schemes from bus to tram systems.

18. **Aviation** - We reject the notion that *'further runway capacity in the South East may be required to meet London's needs'*. In the interest of upholding the Mayor's sustainable development duties, we recommend that the *London Plan* takes a strong stance against airport expansion throughout England. In view of the social and environmental consequences of increasing air travel, the *London Plan* should reject the expansion of airport capacity and confirm that that element of economic growth which is genuinely dependent on more air traffic in the south east should be forgone. That economic growth is likely to be much less than proposed by vested interests. We consider that the expression *'sustainable and balanced London area airport system'* does not make sense and should not appear in the draft *London Plan*.

London's Suburbs

19. We welcome the Mayor's intention to:

- examine the potential for increasing housing provision in town centres, as a catalyst for regeneration, including greater clarity around mixed uses, higher densities, housing mix and the potential for tall buildings;

- examine further improvements to public transport access to and between town centres and to serve Outer London residents; and
- improve safety and security in the town centres.

Liveability (including Safety, Security and Open Spaces)

20. We support all of the proposals that are identified in this section. In addition, the draft *London Plan* should include a clear and explicit statement that the Mayor will strongly resist any development which caused a loss of greenfield land in the Green Belt.

21. The draft *London Plan* should address the extent to which street markets enhance local economies and quality of life, and it should address the question of how street markets may be protected or encouraged through the land use planning system.

CPRE London
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