

Review of the London Plan: Scrutiny by the London Assembly

Response by CPRE London to the letter from the Planning & Spatial Development Committee (22 March 2006)

April 2006

The following comments are limited to the areas of policy specified in the Committee's letter, i.e.:

- Housing,
- London's geography,
- London's suburbs, and
- Social exclusion and Liveability as cross-cutting themes.

Question 1: The Mayor's *Statement of Intent* lists ten policy areas in the London Plan that will be subject to revision. Are these the right areas for the Mayor to consider at this stage? Are there other policy themes that should be reviewed?

We do not propose any further major areas for review. The themes that the Mayor lists in the *Statement of Intent* should provide sufficient scope for inclusion of all the issues that we should wish to be addressed.

Question 2: The Statement of Intent gives some indication of the changes that the Mayor anticipates making to the London Plan. Do any of these give rise to concern, or do you agree with the changes that have been outlined?

Airports - Under 'London's Geography', it is unclear what general policy direction is implied by the expression:

'identify coherent approaches to airport...development'

This could mean encouraging airport development either inside or outside London. Neither would be acceptable to CPRE. Clarification of the Mayor's intention is required.

Waste management - Also under 'London's Geography', the following statement raises concerns:

'recognising London's commitment to reduce inter-regional waste movement and management'

This issue is addressed in substantial detail in the Mayor's current proposals for specific alterations to the London Plan¹ and in CPRE London's comments on that document (available on request). London as a Region is strongly atypical in the ratio of available land to population size and there is a danger that an excessive emphasis on 'regional self-sufficiency' in waste management or disposal will lead to land in London being used for such purposes

unnecessarily while more suitable sites exist elsewhere, possibly in close proximity to London (which would be contrary to the proximity principle). Excessive emphasis on 'regional self-sufficiency' may also exacerbate tensions with alternative potential land uses - such as housing - in respect of specific sites. In view of London's special characteristics, and in view of the fact that much of London's waste arisings are created by non-residents, London should expect to be able to look beyond its boundaries for the most suitable sites. Clarity is needed as to how the drive for greater regional self-sufficiency should be informed by the proximity principle, alternative potential land uses, the need to minimise transport of waste across London and other considerations which help determine the most suitable location for treatment and disposal sites.

Enforceability - The final area of concern is the question of the enforceability of the policies of the London Plan. For example, in respect of the design and construction characteristics of new housing, CPRE London understands that the Mayor has been unable to enforce policies which require standards that go beyond the statutory minima established in the Building Regulations. It may be helpful for the London Plan to explicitly recognise where such issues are likely to arise and to strengthen policy so as to minimise the likelihood of mayoral decisions being overturned on appeal.

Question 3: Can you please identify three specific changes to the London Plan that you would like to see taken forward as part of this review? What are the priority issues on which you will be lobbying the Mayor?

CPRE London's general areas of priority interest concern the likelihood of inappropriate greenfield development in London's Green Belt and the ability of London to accommodate and retain its population and reduce the rate of urban out-migration. The general policy areas which are of most interest to us are therefore:

- the degree of protection given to the Green Belt;
- urban capacity - maximising brownfield land reclamation rates and raising residential densities;
- design and construction standards - ensuring high quality in residential development and town centres; and
- community infrastructure - access to civic facilities and local amenities in new and intensified developments.

In that context, we would like to see the following three specific changes:

1. adoption of the higher rate of housebuilding in the current proposed alterations;
2. an unequivocal commitment to the highest possible standard of protection for the Green Belt; and
3. an unequivocal commitment to enforcing the highest possible standards of design excellence in new housing and urban regeneration schemes.

CPRE London
10/4/06

ⁱ Draft Alterations to the London Plan (Spatial Development Strategy for Greater London). Housing Provision Targets, Waste and Minerals. For public consultation. October 2005