

# The draft new London Plan dissected

With density limits removed and housebuilding targets raised, Peter Eversden queries the environmental costs, and how public transport and social infrastructure will be funded. London Forum has serious concerns

## Density Matrix abolished and housing targets doubled

One of the most significant differences between the new draft Plan and the current one is that the Density Matrix has been abolished and design is to be the prime criterion for judging whether a development is acceptable. The New London Plan doubles the housing target for some outer London boroughs, compared with the current Plan 2015. It also assumes that existing buildings will be replaced, extended or built upwards to achieve greater intensity of land use, including building on any small, available site and large garden, particularly in the suburbs.

This could have several damaging consequences: it will encourage developers to pay too much for land and increase land values, and affect the ability of councils and associations to buy land cheaply to provide social housing. It would further remove the development of high-density schemes from public scrutiny. Projects are agreed between developers and their advisors with planners in confidential sessions. We fear this change will give the developers an even stronger bargaining position.

This secrecy and the potential for planners to be "captured" in these negotiations and the resulting "done deals", are a major fear for local communities. It raises strong concerns about openness, accountability and community confidence in the planning process.

Density policies are being breached and the principles of Sustainable Residential quality abandoned in favour of targets relying on intensified use of land with no regard to either the form or mix of homes to be built. In view of these threats it is imperative that Chapter one's Policy GG1, Building strong and inclusive communities, ensures that there are sufficient services and amenities for the needs of local people for various types of schools and other educational establishments, shopping facilities, health-care, places for meeting and socialising and with close access to green and open spaces.

Development must be supported by sufficient social infrastructure, public transport accessibility and capacity for journeys to desired locations. The

new Plan recommends that if the required support of those types is not in place, developments should be phased until it is available.

The new Plan will be perceived by communities as a further transfer of power toward developers, just at a time when communities are seeking not only greater engagement in planning and development but also wanting to have more of a role in shaping the future of their community/ neighbourhood.

Emphasis must be refocused on the plan-led process where site allocations and the form of development are agreed with local communities.

## A new 'design-led approach'

The London Forum has very serious reservations about the "design-led approach" presented in

**This Policy is purely a development management tool for assessing proposals brought forward by developers – a developer-led approach masquerading as a "design-led approach" in an attempt to sideline the Density Matrix.**

Chapter 3's Policy D6. Design is a subjective criterion, and many boroughs may not have the professional capacity to cope with the negotiations that would be required.

This Policy is not a tool for planning the location of development; it is purely a development management tool for assessing proposals brought forward by developers – a developer-led approach masquerading as a "design-led approach" - in an attempt to sideline the Density Matrix. In their eagerness to get to the "design-led approach" stage,



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the authors have bypassed the plan-making stage.

Boroughs are at different stages in the process of revising their own local plans and many might not be fully compliant with the emerging new London Plan. Few have mapped their facilities and their needs, let alone planned for growth at the neighbourhood/community level, and do not see local communities as the fundamental building block.

London Forum believes that this will need to be rectified and has suggested adding to Chapter 2 / 2.0.7, that 'Communities should be fully engaged in development plans and their needs taken into account.' Infactfroma community perspective, the "design-led approach" could mean less rather than more opportunities for shaping their own community.

It is now widely accepted that terraces, squares, crescents, town houses, mansion blocks etc.- provide a valuable template for achieving intensification and higher densities, without sacrificing the attributes of civilised urban living.

## Housing Policies (Policy GG4 and H1)

The lack of homes to rent at prices people on low to medium incomes can afford is one of the biggest problems in London. For years, the wrong type of housing has been delivered with an excess of market housing, well above the target for homes of that type to meet London's need, many being sold off plan to overseas buyers as investments and left empty. Less than half the affordable housing required has been delivered and this lack is hindering recruitment and retention of workers, particularly for "the operation of the emergency services, the health system and London's transport infrastructure."

The Plan sets a figure of 66,000 new homes to

be supplied each year. This is more than double that which home builders have been providing and the Plan does not explain how a step change in delivery will be achieved. The intensification of land use in outer London to meet the housing targets, some of which have been doubled to those in the current London Plan, may not be possible and could meet strong local opposition.

The encouragement of infill development (Policy H2 D 2) d) is not acceptable. What are 'underused sites' referenced in Policy H2? A garden may be an important local amenity for wildlife, mature trees and local drainage. Just because it has not been built on it does not mean it is underused. Back garden development should not be encouraged; the loss of green space would be contrary to the policies for urban greening.

There are also dangerous proposals in Policy D6 'Optimising Housing Density' which states in paragraph 3.6.2: 'It will not be normally necessary for minor developments to undertake infrastructure assessments or for boroughs to refuse them on the grounds of infrastructure capacity'.

Given that nearly 40% of new homes across London are planned to be on small sites (and up to 78% in some outer London Boroughs), it could lead to the construction of a quarter of a million new homes on incremental small sites without any infrastructure assessment. This is of significant concern to London Forum and its community group members.

The statement "London must seek to deliver new homes through every available means" in paragraph 1.4.5 is unacceptable and must be removed. It could lead to social infrastructure, open space, public transport, and acceptable housing standards provision being ignored, and result in potential harm or unsatisfactory living conditions.

Policy H2 D (2) (b) for home extensions seems to conflict with Policy H2 F (3), which states that there should be net additional housing, plus Policy H2 F (5) for additional housing to be self contained. That would imply that home extensions must deliver a self-contained annex or flat for sale or rent.

There have been over 270,000 homes with planning permission not built and there are many empty homes.

Objectionable prescription on boroughs

London Forum objects strongly to the prescription (Policy H12 C and para 4.12.2) that "boroughs should not set policies or guidance that require set proportions of different-sized market or intermediate units to be delivered."

Boroughs must have the ability to resist developers trying to deliver only the type of housing that suits their profit motives, rather than the required local mix of bedroom sizes and tenures. Left entirely to the market developers are delivering units which appeal to the overseas investor market, rather than producing an appropriate mix including affordable for the home market. It is totally inappropriate to prevent boroughs from including such policies in Local Plans. Housing schemes that do not meet local housing need should be refused.

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**Public sector land should not be sold privately**  
Public sector land being developed by TfL and by boroughs should not be sold to house builders who will require their usual profit levels for housing delivery. On publicly owned land the target of 50% of affordable homes is too low; it should be 75% minimum.

#### Chapter 6 The Economy

The role of the central London Heritage sites as iconic tourist attractions is not specifically considered. Measures to control tourism flows are likely to become increasingly essential in order to avoid conflict with London's residents. Such conflicts will detract from London as a destination. Any loss of reputation reduces the attractiveness of London as a place to live, work and invest.

#### Chapter 7 Heritage and Culture

The London Forum has sought to strengthen policies on conservation areas and the setting of listed buildings and has requested that 'Consideration should be given to the effect of new development on the skyline.' be added.

London Forum and Historic England both urged the Mayor to develop a new London Heritage Strategy, which would encourage heritage-led regeneration and character-led new development.

The Forum has called for recognition of the role of local historical and archaeological societies, as well as the wider local community: societies often have members at least as expert as many professionals.

#### Chapter 8 Green Infrastructure

This commits to protection of London's open spaces and Green Belt which "are a vital part of the capital. Its parks, rivers and green open spaces are some of the places that people most cherish and they bring the benefits of the natural environment within reach of Londoners", prevent urban sprawl, and "should be seen as an integral element and not as an 'add-on'". The Forum welcomes this support for Green Belt and Metropolitan Open Land

The Green Belt should be protected from inappropriate development, and development proposals that would harm it should be refused; the enhancement of the Green Belt to provide appropriate multi-functional uses for Londoners should be supported. Metropolitan Open Land is protected in the same way. The extension of the Green Belt where appropriate will be supported. Its de-designation will not.

#### Chapter 10 Transport

London Forum supports the extension of the Bakerloo Line from Elephant & Castle to Lewisham and beyond, serving Old Kent Road and New Cross Gate but is completely opposed to the loss of any social housing caused by new rail infrastructure in places such as Euston. For

HS2 or Crossrail2 to contribute to the growth of London it is essential that complementary infrastructure, which includes affordable housing, is enhanced not contracted.

The Transport for London budget seems unlikely to provide the transport facilities to support >>>

>>> growth in the time periods required. Demands on developers for transport improvements and additional social infrastructure will reduce the chances of achieving the 65% affordable new housing required.

Overcrowding is now a serious problem on many public transport routes.

#### Other London Forum concerns

These include

- The lack of details for several Opportunity Areas; they should be described in the Plan or there should be an annex describing all of them.
- The impact of major shopping malls like Westfield on nearby town centre businesses, which should be examined, monitored and mitigating actions taken.
- The provision of private amenity space and children's play space; the Mayor should publish a minimum standard for housing developments.
- Boroughs should be able to identify in their Local Plans areas where tall buildings would not be appropriate.
- Basement policies are needed everywhere, not just in inner London
- If health and social care and infrastructure facilities are not provided where they are needed a development proposal should be refused.
- Car-free developments are supported by London Forum as a policy but it means that the Government will have to withdraw its intervention on parking standards
- Noise is dealt with in many different places and is inconsistent in the current draft (owing perhaps to multiple authors). One of the most annoying aspects of noise is that within buildings. The Forum would propose a specific section, perhaps in the chapter on health.
- Policy D12 Agent of Change, is inadequate in that it seems to cover only noise that existing developments and businesses could cause, and not the introduction of new uses. It fails to cover odours, vibration from underground rail lines, light pollution, air pollution or new uses that would cause disturbance.

#### The shortfall in finance

The content of chapter 11 Funding the Plan, is the most frank and depressing set of information in any version of a London Plan, showing, as it does, the shortfall in finance to carry out many of the proposed plans. Most of the schemes listed in Table 10.1 for transport improvements are currently unfunded.

Over the next 30 years something in the region of £11 billion will be needed to fund new primary and secondary school places and energy and water infrastructure will require £148 billion and £46 billion respectively. £4.8 billion will be needed just to keep existing health infrastructure operationally functional. If housing is built without the transport and social infrastructure needed it will not be sus-

tainable and would reduce quality of life for everyone. That makes the target of 66,000 more homes annually just an aim that is most unlikely to be achieved.

#### The next stage

The Examination in Public (EiP) is likely to be in the autumn, led by a panel of Planning Inspectors, who will decide which issues will be discussed at the EiP, and who will be invited to take part. ■

*First published in Newsforum Spring 2018. The London Forum team put an immense amount of time and effort into studying the draft, and produced over sixty pages of detailed criticism of this important document to meet the deadline for comments*

## The Plan structure

The Plan is set out in 12 Chapters. Chapter one lists six core 'good growth' policies which should be taken into account for all planning and development in London, and represent the overarching objectives of the Plan:

- Policy GG1 Building strong and inclusive communities
- Policy GG2 Making the best use of land
- Policy GG3 Creating a healthy city
- Policy GG4 Delivering the homes Londoners need
- Policy GG5 Growing a good economy
- Policy GG6 Increasing efficiency and resilience

Chapter two sets out the overall spatial development pattern for London, focusing on growth strategies for specific areas of the city and how they connect with the Wider South East.

Chapters three to twelve cover topic-based policies and implementation: Design, Housing, Social infrastructure, the Economy, Heritage and Culture, Green Infrastructure and the Natural Environment, Sustainable Infrastructure, Funding the New London Plan and the Monitoring of the Plan's Implementation.

The Plan can be read online at:

<https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/draft-new-london-plan>