

CPRE London
Campaign to Protect Rural England

Green London eBulletin
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The London Plan
www.cprelondon.org.uk

The Mayor's New London Plan

In his preface, Sadiq Khan, Mayor of London, says: “We now face another wave of growth, the likes of which we’ve not seen for a century.” He pledges the plan aims to accommodate all growth within the capital’s boundaries without building on the green belt or other protected open spaces.

Mr Khan says the new draft plan focuses on tangible policies and planning issues, and details how housing, social, economic, cultural, environmental and transport policies tie together. Growth will not be at any cost:

“It’s about delivering a more socially integrated and sustainable city, where people have more of a say and growth brings the best out of existing places while providing new opportunities to communities.”

“What we need is growth that allows us to build thousands of genuinely affordable homes at the same time as creating a more inclusive, greener and safer city that supports the health and wellbeing of all.”

“I see the London Plan revolutionising the way we get around our city – enabling a boom in active travel, with walking and cycling. I envisage London as a greener city, with high quality open spaces, parks and commons, and one where we lead the way in tackling climate change. And when I look to the future, I see London as a city with clean air for our children to breath”

Consultation Process

The draft plan. At 524 pages in length, with more than 150,000 words and just over 100 policies, the New London Plan is a long read (PDF [\[ON\]](#); online [\[ON\]](#)). This briefing focuses on major changes from previous plans and areas of significance to the CPRE brief.

Numbers in brackets in this eBulletin, for example (G2), refer to policies in the draft New London Plan and provide links to the online text.

Timetable. Consultation is underway and will end on 2 March 2018. An examination in public is expected to take place in Autumn 2018, with adoption of the final New London Plan in Autumn 2019.

CPRE. Initial CPRE reaction was to welcome the strong emphasis on making the best use of land and protecting London’s open spaces but to press for measures to improve the quality and value of green spaces . CPRE London is organising a policy seminar in February to help inform responses to the draft Plan.

Analysis of Key Policies

This selective analysis compares the policies in the draft of the *New London Plan* (NLP) with those in the 2015 *Further Alterations to the London Plan* (FALP).

Green belt. Policies have stronger wording in NLP. As with FALP, extension of the green belt and improving its quality is supported but crucially NLP says: “Its de-designation will not [be supported].”

Metropolitan open land (MOL). FALP said: “Development that involves the loss of MOL in return for the creation of new open space elsewhere will not be considered appropriate.” NLP says: “The principle of land swaps could be applied to MOL.”

Green infrastructure. Improving on FALP, NLP has a specific policy to promote all forms of green infrastructure, including through borough plans.

Green and open space. FALP talked of creating new open space and “resisting” development on open space unless it can be replaced locally. NLP says local green and open spaces should be protected, especially in areas of deficiency. Innovative approaches for community food growing are called for in the NLP.

Urban greening. A new policy insists major development proposals should include urban greening as a fundamental element of site and building design. An Urban Greening Factor (UGF) will identify the appropriate amount of urban greening required in new developments.

Biodiversity. New policy wording clarifies and strengthens protection. It also directs boroughs to identify and address areas where there is a deficiency in public access to nature sites. Biodiversity offsetting is discouraged. Policies for protecting trees and geodiversity are clearer but unchanged.

Housebuilding. The NLP ramps up housebuilding ambitions by 33% over FALP. That’s also 58% above the current build out rate. The challenge will be to build the housing London needs without swamping transport and green infrastructure, and to persuade the suburban boroughs to build more homes at a greater density than they are used to doing.

Affordable housing. FALP aimed for at least 17,000 new affordable homes a year (35%). NLP aims for at least 32,500 affordable homes (50%), though some developments may supply just 35%.

Small site policies were absent from FALP. NLP will boost housing supply through small sites but a presumption in favour of building on most small sites could lead to “garden grabbing” and use of green space.

Town centres. Boroughs will now prepare Town Centre Strategies. The NLP recognises the need to restrict conversion of offices to residential use.

Views. FALP said boroughs “might wish” to designate important local views. NLP says important local views “should” be designated.

Heathrow. FALP said: “The mayor strongly opposes any further expansion at Heathrow.” NLP says: “The mayor will oppose the expansion of Heathrow Airport unless it can be shown that no additional noise or air quality harm would result.”

Good Growth Policies

Building strong and inclusive communities. Planners and developers must ensure that everyone benefits from a wide range of economic and other opportunities. They must provide access to good quality services and amenities. Streets and public spaces should be planned for people and their comfort and safety. The crucial role town centres have in social, civic, cultural and economic lives must be promoted. New buildings and spaces should be designed to reinforce the inclusivity and resilience of communities. All Londoners should be able to move around with ease and enjoy the opportunities the city provides (GG1).

Making the best use of land. Planners must prioritise small sites, opportunity areas, brownfield, surplus public sector land, town centre and edge of centre sites, and sites with good public transport. They should promote high density development. They must support a target of 80% of journeys using sustainable travel by planning for good local walking, cycling and public transport. They should aim to strengthen London's varied neighbourhoods by understanding what is valued about them and using this as a catalyst for growth and place-making. They must protect open spaces, the green belt, metropolitan open land, nature conservation sites and local spaces, and promote green infrastructure and urban greening (GG2; H1).

Creating a healthy city. The Healthy Streets Approach will prioritise health in all planning decisions. Planners must assess the potential impacts of development proposals on health and wellbeing. They must promote active and healthy lifestyles, including by increasing the availability of healthy food and restricting unhealthy options. They should plan for improved access to green spaces and provide new green infrastructure. New buildings must be well-insulated and sufficiently ventilated (GG3).

Delivering the homes Londoners need. Planners must ensure that more homes are delivered and support 50% of new homes being genuinely affordable. They must create mixed and inclusive communities, with good quality, well designed homes provide for identified needs, including specialist housing. Ambitious and achievable build-out rates and milestones should be set at the planning stage (GG4).

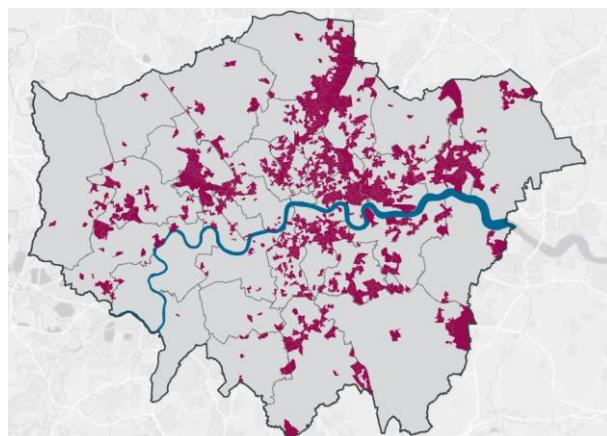
Growing a good economy. Planners should promote the potential of the wider city region and seek to ensure that capital's economy diversifies and that the benefits of economic success are shared more equitably. They must ensure that London continues to provide leadership in innovation, research, policy and ideas. They should promote its rich heritage and cultural assets and its role as a 24-hour city (GG5).

Increasing efficiency and resilience. Planners and developers should seek to improve energy efficiency, supporting a low carbon circular economy and a zero carbon city by 2050. Buildings and infrastructure must be designed to adapt to a changing climate and create a safe environment that is resilient against emergencies, including fire and terrorism. Planners should ensure public, private, community and voluntary sectors plan together on local and strategic infrastructure (GG6).

Spatial Development Patterns

"London's green and open spaces 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. London's green belt and metropolitan open land designations serve to protect these strategically important open spaces, prevent urban sprawl and focus investment and development on previously developed land."

Regeneration. The new plan restates the mayor's commitment to concentrating development in locations in need of regeneration. Opportunity Areas (OAs) will maximise delivery of affordable housing and create mixed and inclusive communities (SD1). Boroughs should identify Strategic Areas for Regeneration in local plans (SD10).



Potential Strategic Areas for Regeneration

Wider South East. The mayor will work with councils and others across the wider South East to address regional and sub-regional challenges and identify development opportunities (SD2, SD3).

Central Activities Zone. The international, national and London-wide roles of the Central Activities Zone (CAZ) should be promoted and enhanced along with its environment, heritage and public realm. Traffic should be reduced, air quality improved, and the night-time economy and tourism promoted. The attractions of predominantly residential neighbourhoods should be conserved (SD4, SD5, E1).

Town centres. London's varied town centres are central to Londoners. The London Plan takes a strong town centres first approach to ensure sustainable patterns of development. Town centre vitality and viability should be promoted as locations for mixed-use or housing-led intensification and renewal, securing a high-quality environment and complementing local character and heritage. Sites for new housing within and on the edges of town centres should be realised through higher-density mixed-use or residential development. Each town centre is unique and should have a Town Centre Strategy that is inclusive and representative of the local community. To sustain town centre vitality and viability, boroughs could issue Article 4 Directions to remove permitted development rights for conversion of office, light industrial and retail units to residential use (SD6, SD7, SD8, SD9, E1). Vacant building credit will not normally apply (H9).

Green Infrastructure

Green is integral. The plan says green infrastructure should be an integral element of development and not an ‘addon’. Green spaces, street trees, green roofs and other major assets such as natural or semi-natural drainage features must be planned, designed and managed in a more integrated way to:

- promote mental and physical health and wellbeing;
- adapt to the impacts of climate change;
- improve air and water quality;
- encourage walking and cycling;
- conserve and enhance biodiversity and ecological resilience;
- support play, sport and recreation.

The mayor will review and update existing planning guidance on the [All London Green Grid](#) with the aim of making London 50% green by 2050 ([G1](#)).

The green belt should be protected from inappropriate development ([G2](#)):

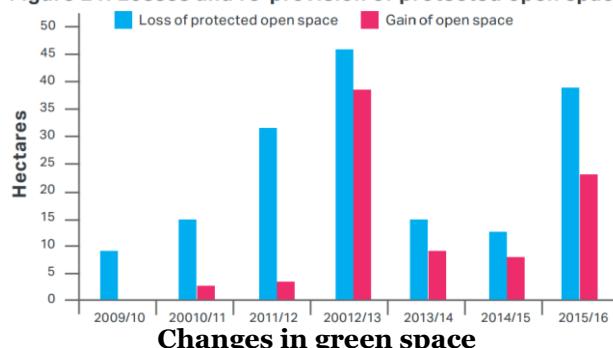
- development proposals that harm the green belt should be refused;
- extension of the green belt will be supported where appropriate: “Its de-designation will not”
- multifunctional uses for Londoners that enhance the green belt should be supported and the green belt will be enhanced:

“Some parts of the green belt do not provide significant benefits to Londoners as they have become derelict and unsightly. This is not an acceptable reason to allow development to take place. These derelict sites may be making positive contributions to biodiversity, flood prevention, and reducing the urban heat island effect. The mayor will work with boroughs and other partners to enhance access to the green belt and to improve the quality of these areas.”

Metropolitan open land is supported but not as strongly as the green belt. The policies haven’t changed from FALP but the accompanying text to the new policy says: “The principle of land swaps could be applied to MOL.” MOL should be protected and its quality and range of uses should be improved. Newly designated MOL must be clearly distinguishable from the built-up area; or includes open air facilities “which serve either the whole or significant parts of London”; or contains historic, recreational, biodiverse features or landscapes of either national or metropolitan value; or it forms part of a strategic corridor or link in the network of green infrastructure. De-designation of MOL could occur in consultation with the mayor ([G3](#)).

Green and open space. Local green and open spaces should be protected. The creation of new areas of publicly-accessible green and open space should be supported, especially in areas of deficiency in access to public open space. Boroughs should undertake a needs assessment of local green and open space to inform policy. The loss of green and open spaces should be resisted in areas of deficiency. If losses are proposed outside of areas of deficiency, equivalent or better quality provision should be made within the local catchment area unless an up-to-date needs assessment demonstrates this is unnecessary ([G4](#)).

Figure 21: Losses and re-provision of protected open space



(from the draft London Environmental Strategy 

Urban greening. Major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design. They should also incorporate measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage. Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments . Under the UGF, semi-natural vegetation, wetlands and open, unchlorinated water score a maximum of 1. Groundcover planting scores 0.5, and concrete and asphalt surfaces zero ([G5](#)).

Biodiversity and access to nature. Sites of Importance for Nature Conservation (SINCs) should be protected. The greatest protection should be given to the most significant sites. Boroughs should identify SINCs and green corridors. They should also identify and address areas deficient in access to nature – areas that are more than 1km walking distance from an accessible SINC. Where harm to a SINC by development is unavoidable, the impact should be minimised and off-site compensation should only be used in exceptional cases. There is no mention of a biodiversity offsetting metric for London, proposed in the draft London Environmental Strategy ([G6](#)).

Trees and woodlands should be protected. New trees and woodlands should be planted to increase the extent of London’s urban forest. Borough plans should protect veteran trees and ancient woodland where these are not already part of a protected site. Development proposals should ensure that, wherever possible, existing trees of quality are retained ([G7](#)).

Food growing. Borough plans should protect allotments and encourage new space for community gardening within developments. They should identify potential sites that could be used for commercial food production. Innovative solutions for small-scale food growing should be considered, such as green roofs and walls, under-used spaces and incorporating spaces for food growing in new schools ([G8](#)).

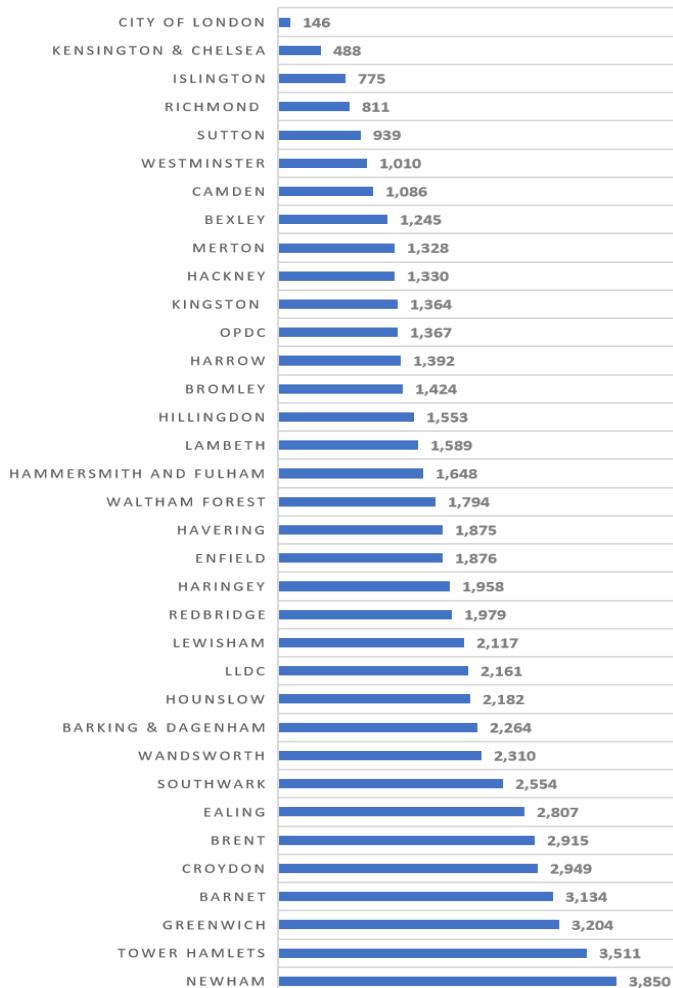
Geology. Borough plans should establish clear goals for the management of identified sites to promote public access, appreciation and interpretation of geodiversity. Where relevant, development proposals should make a positive contribution to the protection and enhancement of geodiversity. Geodiversity sites should also be recognised for their importance in providing habitats for biodiversity and in allowing delivery of ecosystem services ([G9](#)).

Housing

New targets. The GLA's latest Strategic Housing Market Assessment (SHMA) indicates that London has a need for approximately 66,000 additional homes a year up to 2030. The accompanying Strategic Housing Land Availability Assessment suggests that London has the capacity for around 65,000 additional homes a year. The draft of the New London Plan chooses the lower annual target of 65,000 new homes, 33% higher than the current target of 49,000 set out in the Further Alterations to the London Plan (FALP) in 2015 ([H1](#)).

Current build out. In 2016/17, there were 30,900 new builds in Greater London. An additional 1,800 homes were gained through conversions and 8,800 through changes of use (including 6,300 under permitted development rights) . The total of just over 41,000 new dwellings is 8,000 short of the overall FALP target. It is a long way short of the New London Plan target of 65,000 new homes a year, which will require housebuilding to be ramped up by 58%.

Boroughs. Six boroughs will see a decrease in their housing targets compared to FALP (page 8). The others will see increases ranging from 2% to more than 200%. It is no surprise that Merton gets the highest increase of 223% as it was only planning 320 new homes a year. It is more of a surprise that Islington gets a cut in its housing target of nearly 40%. Borough housing targets will be monitored over a ten year period ([H3](#)).



New London Plan annual housing targets

Inner and Outer. The suburbs of Outer London are expected to take the major share of the proposed housing growth. Sadiq Khan is proposing that 55% of the new homes are in Outer London (currently 43%) and 45% in Inner London (currently 57%) ([H1](#)).

Increasing housing supply. Where new sustainable transport infrastructure is planned, boroughs should re-evaluate land use designations and consider accommodate higher-density residential and mixed-use development. There is a general presumption against single use low-density retail and leisure parks, which should be mixed use to include housing ([H1](#)).

Small sites. Small sites should play a much greater role in housing delivery, delivering 24,573 new homes a year (38% of the London Plan target). Boroughs are given targets (see page 8). They should recognise that local character may need to change to accommodate housing and increases in density. They should identify sites, proactively seek increased housing at higher densities and prepare design codes. Boroughs should apply a presumption in favour of developments and conversions that provide up to 25 homes near transport hubs. The presumption should also apply to infill development, residential extensions and conversions, upwards development and housing in the curtilage of a residence. Loss of biodiversity or green space as a result of small developments should be mitigated through measures such as green roofs, sustainable urban drainage or off-site provision such as street trees ([H2](#)).

Delivering affordable housing. The Strategic Housing Market Assessment identified a need for 43,500 affordable homes per year. The New London Plan strategic target is for 50% of all new homes delivered across the capital to be affordable. Affordable housing should normally be provided on site to deliver inclusive and mixed communities ([H5](#)). Under a threshold approach, developments delivering a minimum of 35% affordable housing will not need to submit a viability assessment. The threshold rises to 50% for public land and for strategic industrial sites. Affordable homes should be built in a range of sizes and be equivalent size to the market housing provision when averaged across the development ([H6](#)). The plan gives specific definitions of affordable housing ([H7](#)).

Redevelopment and estate regeneration. Loss of existing housing is generally only acceptable where the housing is replaced at existing or higher densities. Loss of existing affordable homes should not be permitted unless it is replaced by equivalent or better quality affordable housing (see [TI INS HO](#)). In estate regeneration, social rented accommodation should be replaced with affordable homes with rents at similar levels ([H10](#)).

Other policies. Boroughs should reduce the number of vacant dwellings, including 'buy to leave' properties, and consider the impact of holiday lets ([H11](#)). The mix of housing sizes should reflect the evidence in the SHMA and local assessments ([H12](#)). Rules are set out for the Build to Rent sector ([H13](#)). Guidelines are provided for specialist and supported housing, including annual borough benchmarks for specialist older persons housing ([H14](#), [H15](#)), along with gypsies and travellers and students ([H16](#), [H17](#)). Large-scale purpose-built shared living developments may have a role in meeting housing need ([H18](#)).

Design

Form and character. Good design is intrinsically linked with good planning. The form and character of buildings and spaces must be appropriate for their location, fit for purpose, respond to changing needs and make the best use of land supply through optimum density. Places should be street-based with clearly defined public and private areas, green and open spaces, and urban greening. They should have active frontages and positive relationships between what happens inside buildings and in the public realm. Developers should utilise and enhance those heritage assets and architectural features that contribute to the local character (D1).

Delivering good design. Understanding the context and character of individual areas is essential to assessing how different places may develop. Boroughs must evaluate capacity for growth and understand how to deliver it in a way which strengthens what is valued in a place. Boroughs and applicants should use design reviews to assess and inform design options early in the planning process (D2).

Inclusive design. Developments must meet the highest standards of accessible and inclusive design, ensuring they can be used safely, easily and with dignity by everyone. At least 10% of homes should be wheelchair accessible (D3, D5).

Housing quality and standards. The plan sets out minimum space standards for new homes, including external private space. “Housing developments should... enable the home to become a comfortable place of retreat and should not differentiate between housing tenures” (D4).

Optimising housing density. Land must be developed at an optimum density. Residential development that does not optimise housing density should be refused. The capacity of existing and planned physical, environmental and social infrastructure to support new development should be assessed. Where necessary, improvements to infrastructure capacity should be planned to support growth (D6). There are fears that this could result in excessive densities in some locations, driven by developers seeking to maximise profits (S).

Public realm. Local plans and applications should ensure the public realm is safe, accessible, inclusive and attractive. They should relate to the local and historic context, and incorporate the highest quality design, landscaping, planting, street furniture and surfaces. Plans must maximise the contribution of the public realm to active travel and ensure design discourages travel by car and excessive on-street parking. Green infrastructure should be incorporated into the public realm to support sustainable drainage, reduce exposure to air pollution, manage heat and increase biodiversity. Planners should ensure shade, shelter and seating are provided to encourage people to spend time in a place. Boroughs should remove unnecessary or dysfunctional clutter or street furniture. Applications to introduce unnecessary street furniture should be refused (D7).

Basements. Boroughs, particularly in inner London, should establish policies to address the negative impacts of large-scale basement development (D9).

Tall buildings have a role in helping London accommodate growth “as well as supporting legibility across the city to enable people to navigate to key destinations.” Boroughs should identify locations where tall buildings will be appropriate in principle. Attention should be paid to views of the buildings. Tall buildings should reinforce the spatial hierarchy of the local and wider context and avoid harm to heritage assets and World Heritage Sites, and their settings. They should not compromise the comfort and enjoyment of open spaces, including water spaces, through shadowing, wind or noise. Public access areas should be provided in the tallest buildings where appropriate. Buildings near the River Thames should not contribute to a canyon effect along the river (D8).

Noise. Developers will be required to mitigate noise under the Agent of Change principle. This places the onus for mitigating impacts from existing noisy activities, such as music venues, on the proposed new development (see Music Week). Planners should improve and enhance the acoustic environment, and promote Quiet Areas and spaces of relative tranquillity. Developers, other than of aviation projects, should separate new noise-sensitive development from major noise sources, such as road, rail, air transport and some types of industrial use. Development proposals that have not clearly demonstrated how noise impacts will be mitigated and managed should be refused (D12, D13).

Economy

Office and enterprise. Increases in the stock of offices and its quality should be supported. Reserve locations for CAZ-type office functions are identified at Stratford and Old Oak Common. Other office markets should be developed in town centres, including Croydon, and on existing businesses parks. A range of low-cost B1 business space and workspaces should be provided. Loss of existing B1 space, including creative and artist studio space, should be resisted (E1, E2, E3). Boroughs should allocate start-up, incubation and accelerator space for small enterprises, including flexible workspace, laboratory space and theatre, television and film studios (E8).

Industry and services. Land should be designated for industry, logistics and services, protected by Article 4 directions if needed. Barking, Havering and Newham will be allowed a limited release of industrial land. Brent, Ealing, Enfield, OPDC, Sutton and Wandsworth must find additional land (E4, E7). Fifty-five Strategic Industrial Locations are identified. Boroughs should identify Locally Significant Industrial Sites (F5, F6).

The **Retail** policies in the economy section of the plan are largely the same as those outlined above for town centres (page 2). Boroughs should also support markets, including street, covered, specialist and farmers' markets. Hot food takeaways should not be permitted within 400 metres walking distance of a school (E9).

Sports and Play

Play and informal recreation. Boroughs should audit existing play and informal recreation provision and develop strategies to increase opportunities. Family housing proposals should aim to increase safe opportunities for play and informal recreation. They should provide good-quality play areas for all ages of at least 10 sqm a child. These play areas should provide a stimulating environment, be safe and an integral part of the neighbourhood, and include trees and greenery. Large public realm developments should incorporate incidental play space ([S4](#)).

Sports and recreation facilities. Boroughs should regularly assess the need for local and sub-regional sports and recreation facilities and identify sites. They should maintain and promote the [Walk London Network](#), and encourage networks for walking, cycling and other activities. Facilities proposed on existing open space, including metropolitan open land, should be assessed against policies on protecting open space; the borough's assessment of needs and opportunities for sports facilities, and the development's impact ([S5](#)).

Heritage and Culture

Visitor economy. The special characteristics of major clusters of visitor attractions and the diversity of cultural infrastructure should be conserved and enhanced ([E10](#)). Public toilets in large commercial and leisure developments, and larger areas of public realm, should be free of charge ([S6](#)). Free drinking fountains should be provided in the public realm ([D7](#)). The night economy will be supported ([HC6](#)). Boroughs should protect public houses where they have a heritage, economic, social or cultural value to local communities. They should support appropriate new pubs ([HC7](#)).

Heritage. Boroughs should develop an understanding of the historic environment. This evidence should be used for identifying, understanding, conserving, and enhancing the historic environment and heritage assets, and improving access to the heritage assets, landscapes and archaeology. Development proposals affecting heritage assets and their settings should conserve their significance. The cumulative impacts of development on heritage assets and their settings should also be actively managed. Boroughs should identify opportunities for buildings at risk that contribute to regeneration and place-making ([HC1](#)). Development proposals affecting World Heritage Sites and their settings, including any buffer zones, should conserve, promote and enhance their Outstanding Universal Value ([HC2](#)).

Strategic and Local Views. The mayor has kept the list of 27 Strategic Views from FALP, which he will keep under review. Development proposals must be assessed for their impact on a designated view. Boroughs should identify important local views in their local plans. Development in the foreground and middle ground of a designated view should not be overly intrusive, unsightly or prominent. Building within the view's wider setting should be attractive. Development proposals and external illumination of structures in the background of a view should give context to landmarks and not harm the composition of the view ([HC3](#), [HC4](#)).

Culture and creative industries. Boroughs should protect cultural venues, facilities and uses and support new cultural venues in town centres and places with good public transport connectivity. They should identify and promote new or existing clusters as Cultural Quarters, especially where they provide an anchor for local regeneration and town centre renewal. Boroughs are encouraged to work with the mayor to identify Creative Enterprise Zones in local plans ([HC5](#)).

Sustainability

Air quality. Air quality should be significantly improved and exposure to poor air quality, especially for vulnerable people, should be reduced. Developments should be at least air quality neutral. Opportunity Areas and developments subject to an environmental impact assessment should be air quality positive ([SI1](#)).

Energy. Major development should be net zero-carbon achieving a minimum on-site reduction of at least 35% beyond building regulations. Boroughs must establish a carbon offset fund ([SI2](#)). Energy masterplans should be prepared for large-scale developments. Major development proposals within Heat Network Priority Areas should have a communal heating system. New renewable energy sources should be provided, including energy from waste schemes, and solar photovoltaics and solar thermal ([SI3](#)). Development proposals for exploration, appraisal or production of shale gas via hydraulic fracturing (fracking) should be refused ([SI11](#)).

Circular economy. Recycling targets remain unchanged from FALP: municipal waste 65% by 2030 and construction waste 95% by 2020. Applications referred to the mayor must include a Circular Economy Statement and aim to be net zero-waste ([SI7](#)). All London's waste should be processed within the capital by 2026 ([SI8](#)).

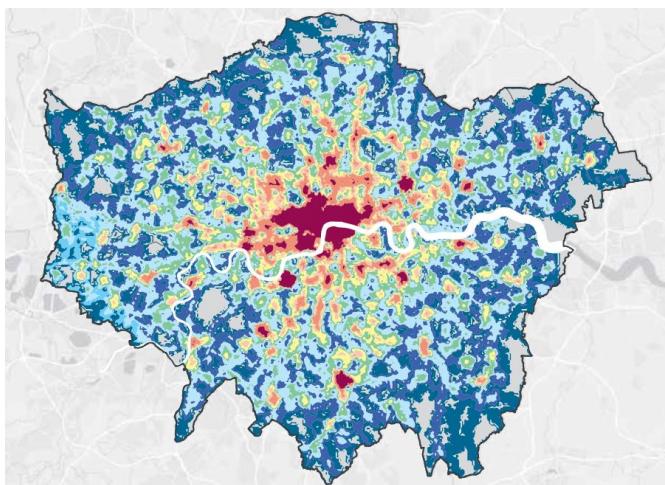
Flooding, sustainable drainage and building in flood zones policies are little changed from FALP ([SI12](#), [SI13](#)).

Transport

Strategic approach. Local plans and development proposals should support the mayor's strategic target of 80% of trips in London to be made by foot, cycle or public transport by 2041. Plans should promote and demonstrate the application of the Healthy Streets Approach. They should identify opportunities to improve the balance of space given to people to dwell, walk, cycle and travel on public transport, so space is used more efficiently and streets are greener and more pleasant ([T1](#), [T2](#)). Plans should safeguard sites for transport, including the Walk London Network ([T3](#)). Planning permission may be contingent on the provision of necessary public transport and active travel infrastructure where that is lacking ([T4](#)).

Cycling. Development plans and applications should help remove barriers to cycling and create a healthy environment in which people choose to cycle ([T5](#)).

Car parking. Car-free development should be the starting point for all development in places that are, or are planned to be) well-connected by public transport. Developments elsewhere should be designed to provide the minimum necessary parking ([T6](#)).



Public transport access levels 2021
Warmer colours have greater access

Waterways. The name “Blue Ribbon Network” used in FALP has been dropped from the new London Plan. The new London Plan says the network of waterways are multifunctional assets with a strategic role. New Joint Thames Strategies will improve and promote the river, including public access and transport. Wharfs and boatyards will be protected and river freight increased, including for construction sites. Passenger and tourist numbers will also increase. New water sports facilities should be supported where they do not interfere with navigation. New moorings should be supported away from main navigations and in basins and docks. Waterside development proposals should aim to improve the Thames Path and towpaths. Developments that facilitate river restoration, including opening culverts, naturalising river channels, protecting the foreshore and increasing the value of heritage and habitats should be supported (SI14, SI15, SI16, SI17, T3).

Aviation. The mayor supports the case for additional aviation capacity in the South East. The environmental impacts of aviation must be fully acknowledged and the aviation industry should fully meet its external and environmental costs particularly in respect of noise, air quality and climate change.

“The mayor will oppose the expansion of Heathrow Airport unless it can be shown that no additional noise or air quality harm would result, and that the benefits of future regulatory and technology improvements would be fairly shared with affected communities.”

Any airport expansion scheme must be assessed and demonstrate that there is an overriding public interest or no suitable alternative solution that has fewer environmental impacts. New heliports should be refused and steps taken to reduce helicopters overflying London (T8).

The CPRE London eBulletin

Editorial. The CPRE London eBulletin is issued several times a year. Any views expressed are those of the editor and contributors, not of any part of CPRE. Andy Boddington, Editor, cprenews@andyboddons.co.uk.

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Selected Reaction to the NLP

Suburbs. Conservative AMs accused Khan of “declaring war on the suburbs” with a plan that would leave outer boroughs “browner, overcrowded and harder to get around” **g**. Bromley leader Colin Smith said the plan was “extremely bad news for Bromley”. Roger Ramsey, leader of Havering, said: “With this plan the mayor appears to be waging war on suburban outer London boroughs like Havering.” Enfield Council said the plan posed little problem provided the government supported new infrastructure in the Lea Valley **INS HOI**. Kevin Davis, leader of Kingston, said: “Destroying the best of what we have is not the way to solve the housing crisis” **USA**. Matt Brown of *Planning* welcomed the emphasis on suburban densification – “unsprawling” – to complement inner city regeneration **P**.

Conservative AM Andrew Boff accused Sadiq Khan of adopting a “backwards approach” to dealing with the capital’s housing crisis **LONDON TIMES get**. He said the draft plan fails to take advantage of industrial land that could be used for building 27,000 homes:

“Sadiq Khan’s London Plan has made it easier for someone to build a small block of flats in their back garden but made it more difficult to build on a large area of waste land. It’s a backwards approach to solving the housing crisis.”

A spokesperson for the mayor responded:

“Andrew Boff’s approach would be hugely damaging to London’s economy and under his proposals, there’s a risk thousands of Londoners could find their jobs have been moved miles out of the city.”

Labour AM Nicky Gavron, chair of the assembly planning committee, welcomed the plan **LONDON**.

Green AM Sian Berry said **BON**:

“The mayor’s affordable housing policies in this plan are a real let down for the average Londoner – they look set to let developers off the hook again and won’t deliver what Londoners need.”

Matt Richards of Bidwells thought the green belt policies were beyond national rules **BID**:

“It’s an ambitious plan that seeks to deliver 66,000 new homes a year without allowing London boroughs to de-designate areas of green belt or provide for development on vacant and derelict sites within the green belt, arguably going beyond the NPPF’s green belt policies.”

Reza Newton of PinSENT Masons questioned whether the new plan was going beyond its brief **D**:

“The revised housing targets for the London boroughs are ambitious, particularly with their focus on small site provision of around 24,500 per annum. The difficulties and economics of delivering on small sites may mean this is not achievable. Overall, the plan is more prescriptive than the current London Plan, appearing to go beyond its role as an overarching strategic planning document.”

Architects have welcomed the draft plan’s focus on improving the quality of new developments through the retention of architects and early design review **bd bd**.

Annual Housing Targets in the London Plan

Borough	Current local plan target	Existing annual target in FALP ¹	New London Plan annual housing target	Increase of New London Plan target over FALP	% increase of New London Plan target over FALP	New London Plan small sites annual housing target ²
Barking & Dagenham	1,264	1,236	2,264	1,028	83%	519
Barnet	1,867	2,349	3,134	785	33%	1,204
Bexley	963	446	1,245	799	179%	865
Brent	1,826	1,525	2,915	1,390	91%	1,023
Bromley	1,319	641	1,424	783	122%	1,029
Camden	1,117	889	1,086	197	22%	376
City of London	125	141	146	5	4%	74
Croydon	2,440	1,435	2,949	1,514	106%	1,511
Ealing	933	1,297	2,807	1,510	116%	1,074
Enfield	2,048	798	1,876	1,078	135%	983
Greenwich	1,557	2,685	3,204	519	19%	681
Hackney	2,126	1,599	1,330	-269	-17%	660
Hammersmith & Fulham	844	1,031	1,648	617	60%	298
Haringey	1,357	1,502	1,958	456	30%	626
Harrow	605	593	1,392	799	135%	965
Havering	1,366	1,170	1,875	705	60%	904
Hillingdon	3,081	559	1,553	994	178%	765
Hounslow	1,556	822	2,182	1,360	165%	680
Islington	1,150	1,264	775	-489	-39%	484
Kensington & Chelsea	575	733	488	-245	-33%	169
Kingston upon Thames	717	643	1,364	721	112%	625
Lambeth	1,195	1,559	1,589	30	2%	654
Lewisham	1,670	1,385	2,117	732	53%	829
LLDC ³	1,600	1,471	2,161	690	47%	80
Merton	320	411	1,328	917	223%	671
Newham	2,723	1,994	3,850	1,856	93%	950
OPDC ⁴	-	-	1,367	-	-	6
Redbridge	2,286	1,123	1,979	856	76%	938
Richmond upon Thames	1,047	315	811	496	157%	634
Southwark	1,648	2,736	2,554	-182	-7%	800
Sutton	1,100	363	939	576	159%	738
Tower Hamlets	2,796	3,931	3,511	-420	-11%	566
Waltham Forest	2,385	862	1,794	932	108%	889
Wandsworth	988	1,812	2,310	498	27%	774
Westminster	740	1,068	1,010	-58	-5%	529
Total	47,734	42,389	64,935	22,546	53%	24,573

1. FALP: Further Alterations to the London Plan 2015.

2. Small site targets are part of the overall housing target.

3. LLDC: London Legacy Development Corporation.

4. OPDC: Old Oak and Park Royal Development Corporation.