

## London Plan Revised Early Minor Alterations June 2012 - London Forum response

The London Forum of Amenity and Civic Societies ('The Forum') is a charity formed in 1988 by the Civic Trust to support and represent over one hundred community groups in London. The Forum has participated at examinations of the London Plan.

The Forum's comments on the alterations are given below within each London Plan chapter with additions and changes in red.

### OVERVIEW AND INTRODUCTION

In 0.19A in the middle of paragraph two, **change** 'can' to 'should' in .... **he considers that the London Plan should be seen as the expression of national policy for London, tailored.....**

**Insert** at the end of that sentence the words **including the social housing that is required.** This carries forward the statement by the Mayor on 21st September 2010 of determination to build more social housing. It addresses one part of the housing need in the capital which the Government's definition of affordable housing cannot, as stated in London Plan paragraph 1.30 and demonstrated by the 2008 SHMA study.

In 0.19A **add** to the alteration which ends with .... **sustainable development here** the following.

**As part of the development plan for London, the London Plan is the basic Core Strategy for each of the London boroughs, to which they add their local policies. Development control decisions should be determined in accord with both policies of the London Plan and of the Local Plan.**

This guards against any wrong decisions under the NPPF's requirement that the default answer to a planning application is 'Yes' if the Local Plan is not up to date.

### CONTEXT AND STRATEGY

In the alteration to the third bullet point of paragraph 1.46 **insert** the words in red, as follows.

**This duty requires planning authorities to work together constructively on planning for strategic matters and major development Opportunity Areas affecting at least two planning areas,.....**

Paragraph 1.46 contains one of three alterations to the London Plan with the words 'sustainable development'. The Forum proposes that the Mayor should **add a definition of sustainable development for London** to the London Plan.

This is required because the NPPF does not mention London nor any different requirements or circumstances that it has to the rest of the country, nor the fact that it has its own regional spatial development strategy.

### LONDON'S PLACES

In 2.13 **amend** the last sentence as follows.

He **and the Outer London boroughs** will work with neighbouring planning authorities and others to this end.

### LONDON'S PEOPLE

The Forum supports the alterations to paragraphs 3.9, 3.9A and 3.10.

**In addition** Paragraph 3.10 reference to "places for meetings between all members of the community" **should specifically mention pubs.**

The Forum **objects** to the wording of paragraph 3.14A and proposes that the word 'are' in 'These targets are informed by the need for housing as evidenced by.....' should be replaced by the word '**were**'. It should be noted that the SHMA identified requirements until only 2017. At the end of that sentence **add The Mayor will conduct a new SHMA and SHLAA by the end of 2013 to update the evidence base for the housing targets following the publication of the 2011 Census figures for London.**

**Alter** paragraph 3.46 by replacing '2015/16' by **end of 2013**

That would accord with the evidence given on behalf of the Mayor on 7<sup>th</sup> October 2010 to the Examination in Public held then of the London Plan. The new studies are required by the requirements for sustainable development in the NPPF and the Government's changes in the affordable housing definitions and policies.

Similarly to the comment on paragraph 3.14A, the Forum **objects** to the wording in paragraph 3.16 about the SHMA and proposes the following replacement to the sentence after the words '....over the life of the Plan.'

**These were identified up to 2017 by the GLA's 2008 Strategic Housing Market Assessment for market and affordable housing and the assessment will be repeated by the end of 2013 to cover an extended period within the Plan.**

The Forum confirms its earlier **objection** to the wording of the early minor alteration to paragraph 3.44 because the new affordable rent product which the Government intends to address the same housing needs as social rented housing will not deliver the social housing London requires even at 65% rather than 80% of market rents due to the high rents that apply in the capital. The Mayor must address this problem as he develops a Strategic Housing Needs Assessment, the SHLAA and his Housing Strategy.

Only social rents are affordable to many people, particularly in East London, and failure to meet their needs for homes will not accord with London Plan policies for dealing with deprivation and achieving equality of opportunity.

The Mayor should **add** an explanation in paragraph 3.57A of what is meant by meeting the needs of **people wishing to build their own homes** to indicate that it **includes self-build, community land trusts and community co-operative schemes.**

The Forum **objects** to deletion in Policy 3.10 of section A a. It should be reinstated with the words **Affordable housing should** at the beginning and the words **local rents,** after 'with regard to'.

In Policy 3.11, **add** to the end of B the words **of each type.**

#### LONDON'S RESPONSE TO CLIMATE CHANGE

**Add** a paragraph of explanation after Policy 5.12 to summarise the changes introduced by the Technical Guidance on flood risk.

Paragraph 5.57 should be **further altered** to promote greening of London by implementing methods of slowing the flow of rainwater into the sewer system as implemented by local authorities in Philadelphia in the USA.

#### LONDON'S TRANSPORT

The Forum supports the alteration to paragraph 6.12 for boroughs to safeguard land for transport.

**Add** to the new Policy 6.5 E after the word 'identify', **and agree with local communities and businesses**

**Add** to the end of the alteration to paragraph 7.80 , **including protection of the Mayor's safeguarded wharves on the River Thames and facilities for freight transfer between waterways and land on London's canals.**

#### LONDON'S LIVING SPACES AND PLACES

The second sentence of the alteration to paragraph 7.5 about renewable and low carbon energy should be in Chapter 5.

The first sentence of the alteration to paragraph 7.5 is supported but the topic of communities designating green spaces for protection should be **added** into the Mayor's policies 7.16 to 7.19 also.

The Forum **objects** to the alteration in paragraph 7.31 as it is not a clear expression of policy for decision making. The use of the words "**less than substantial harm**" when assessed against the significance of a designated heritage asset are too vague. Any development could cause less than substantial harm but that should not mean that heritage policies should not be upheld strongly even for an enabling development.

#### IMPLEMENTATION, MONITORING AND REVIEW

**Add** to the alteration in Policy 8.3 D the words **Boroughs should continue to seek Section 106 agreements with developers where appropriate to mitigate any adverse affects in the vicinity of a development.**

**Amend** the alteration at the end of paragraph 8.15 as follows.

**.... monitor the effects of his CIL, and to conduct two-yearly formal reviews on which he will consult to ensure the rates and other details of his CIL remain appropriate.**

Submitted 31 July 2012 by Peter Eversden, Chairman, London Forum of Amenity and Civic Societies