



London Forum *Insights*

Issue 16, September 2023

Editorial

The period since the last issue of London Forum *Insights* has coincided with the parliamentary recess, so there has been little progress with the Levelling Up and Regeneration Bill (LURB). The Government tried to insert clauses to set aside the Nutrient Neutrality test for new housing schemes, but these were rejected in the Lords, where the Bill's Third Reading is imminent. It will then return to the Commons for consideration of the Lords amendments, and could have Royal Assent by the time the next *Insights* issue appears.

In the meantime, Mr Gove has announced his intention to “intervene (in London), using all the arms of government to assemble land, provide infrastructure, set design principles, masterplan over many square miles and bring in ambitious private sector partners. Our ambition in London is a Docklands 2.0 – taking in the regeneration of Thamesmead, Beckton and Silvertown to deliver up to 65,000 new homes.” We welcome the recognition that meeting national housing need can only be achieved if London is firing on all cylinders; whether “using all the arms of government” is the solution remains to be seen. In this issue, Forum Trustee Darian Mitchell draws attention to the current crisis in the construction industry.

Two major government consultations have occupied the Forum of late, one proposing yet more permitted development rights for converting existing properties to dwellings, the other outlining reforms aimed at speeding up the preparation of local plans. Ensuing articles make clear the Forum’s opposition to many of the proposals in each of these consultations.

Finally, a new version of the NPPF has been issued. The only change of note is that the conditions that effectively prevent further onshore wind farms have

been slightly relaxed, and there is support for extending the life of existing onshore turbines (re-powering).

Upcoming events

12 October 6.00 for 6.30 pm

Join us for the London Forum AGM plus!

We hope you have received your AGM notice, sent out by post and email a few weeks ago. Within a week 20 or so members had booked themselves in, and we hope many more of you will [sign up](#) to join us on the day at The Gallery, 75 Cowcross Street. As well as the formal business of the AGM, we will welcome our President Ben Derbyshire and Patron Professor Tony Travers to share their thoughts with us and discuss issues raised by our audience. All very exciting.

15th November, 6pm

Zoom briefing on key London Plan Guidance documents

In the summer, the GLA published a long-awaited suite of guidance documents about how policies in the current London Plan are to be implemented across the boroughs. This event introduces two documents that are of considerable importance to our members - **Optimising Site Capacity, A Design-led Approach** and **Small Sites Design Codes**.

This will be a Zoom event, and we expect that the Planning leads of all member societies will want to take part. The documents will be introduced by Alan Smithies of the London Plan team, and there will be plenty of time for questions and discussion. Full details will be sent out nearer to the date.

Andrew Bosi's Transport News

Transport news has been dominated by two issues since our last edition. The extension of the ULEZ to the whole of London provoked a campaign of civil disobedience with cameras vandalized, following the outcome of the Uxbridge and South Ruislip by-election. In a repeat of the 1997 by-election, Labour failed to take a seat it expected to win with a candidate from outside the local area. The Mayor's extension of the ULEZ was widely blamed for this, ignoring deficiencies in the Labour Party campaign or the fact that those in favour of the ULEZ were scared off by the change of tack.

Some people usually less cynical than I suggested Labour wanted to lose. Given the state of the country, maybe no-one wants to govern and reap the unpopularity that would inevitably follow.

Now that the dust has settled and some of the inaccurate claims of the extent of the scheme are seen to have been exaggerated, the focus will shift to whether the improvements to public transport from the “Superloop” of bus routes will be noticeable. Consultation on the first two routes, the X34 and X183, which closely follow the 34 and 183 respectively, has resulted in some modifications to the stopping points which should improve the routes (now to be SL1 and SL10). Critical to their success will be the extent to which they can avoid congestion.

The existing radial routes (X68 and 607) have been renumbered and rebranded. Announcements will follow on the remaining orbital routes. The new radial route (see illustration below) awaits the opening of the controversial Silvertown River crossing.



Although opponents of the ULEZ extension have complained that public transport is far worse in outer London than in the original zone, compared to much of the country outer London is well served. Try getting a bus in the evening in Taunton, Gloucester or even large parts of Bradford.

The second issue affects the whole nation but again London's plight is less desperate than elsewhere. This is the proposal to close most of the ticket offices on Network rail stations. It has prompted more than half a million responses, almost certainly not in support, with the impact on disabled people

of particular concern. In London even large stations like Euston would lose their ticket office. Tickets would be available at King's Cross, but the additional time and hassle involved in travelling there and then making the journey to Euston would deter many who rely on routes with level access.

The closures were proposed because “only” 12% of tickets are bought in this way, with some spurious claims that staff on platforms would provide a better service. Having attached the Minister’s name to the Williams review of the railways, and promised the creation of Great British Railways, the government seems to have got cold feet over its own proposals. Following Covid, the Train Operating Companies (TOCs) bear no risk for falling income. Nor do the Department for Transport, who now micro-manage the operation, have any financial incentive to grow the railways: all fare income goes to the Treasury. The Treasury understands only one way of balancing the books: cutting expenditure.

In view of the volume of responses, the time given to London Travelwatch and Passenger Focus to analyse the results has been extended to the end of October. It seems certain that they will report that extreme hardship would result, but the TOCs in whose name the cuts were mooted can then ask the DfT for permission to go ahead with a government inspired scheme. Usually we are spared unpopular measures just before an election, but if it is a contest no-one wants to win that may not hold good this time.

Permitted Development Rights – yet again!

In July the Government announced a consultation on proposals to further widen the scope of developments which can go ahead without the need for a full planning application – see [here](#). The proposals which most affect London are those that will allow the more-or-less unfettered conversion of yet more existing buildings - in particular hotels, boarding houses and guest houses - to residential dwellings. Furthermore, the Government is proposing that the size limit for such conversions should be raised, the “3-month vacancy restriction” should be dropped, and only development affecting World Heritage Sites should be protected by virtue of land designation (so there will be no exemption for Conservation Areas).

The London Forum is opposed to almost all of these changes, as they lead to poor quality residential accommodation, and further restrict the ability of local planning authorities to give shape to developments in their boroughs. We are also pressing for all developments carried out under Permitted Development Rights to be subject to the Prior Approval process. One small crumb of comfort

is that launderettes will now be removed from the hit list – this is a particularly London issue.

The consultation also makes the case for replacing consideration of individual development proposals with blanket approval for all those that comply with prevailing Design Codes. Although the Forum supports the increased use of Design Codes, this trend is in its infancy and there is little experience in their production, let alone their application to decision-making on planning applications. Much more experience must be gained before such a proposal can be countenanced.

The London Forum is submitting a robust response to this consultation which closes on 25th September.

Consultation on proposed Reforms to Plan-Making Forum Trustee, Michael Jubb has reservations

Michael Gove's Department is not short on consultations. There are currently at least three of particular interest to the London Forum and its member societies, including the subject of this article, proposed reforms to the making of Local Plans by Local Planning Authorities (LPAs).

The stated aims are to

- reduce the complexity of Plans and to make their role and content clearer, with more use of digital tools, visualisation and mapping; and
- to reduce the time taken to develop Plans to a maximum of 30 months from initiation of the process to adoption, and to ensure that new Plans are developed every five years.

These are laudable objectives. But the proposals raise a number of concerns.

- The proposals insist that the plan-making process should start with a 'vision' to be developed before any evidence has been gathered and analysed, and which should run like 'a golden thread' through the whole plan. There's very little guidance on what the 'vision' should consist of; and no mention of specific, measurable, achievable, relevant and time-bound (SMART) aims and objectives. Moreover, it is suggested that Government should prescribe limits to the nature, scope and volume of the evidence required to support the Plan.
- The proposals require that all plans should conform to detailed templates determined by central Government. While some standardisation would

be welcome, there is no recognition that LPAs operate in very different contexts, and that what might be appropriate for one authority might not be for others.

- There is a process prescribed in detail to achieve the required 30-month timetable, with three external ‘gateway assessments’ during the process, to be conducted by inspectors or by other assessors appointed by the Secretary of State. There is no mention of community or stakeholder engagement in these assessments, which would be paid for by each LPA. A new organisation would be set up to oversee the assessments, though its nature and purpose are not specified.
- Despite a welcome emphasis on stakeholder and public engagement, the time allowed for consultation in the plan-making process is limited, and constraints are added to engagement with inspectors at the final examination.
- There’s a welcome stress on the importance of annual monitoring. But a proposed list of metrics is highly generalised, and will not meet the needs of all areas. Nor is there any recognition of the need in different areas to gather regular monitoring data on specific policies and strategies.

Societies may also wish to examine the proposals – and restrictions – on supplementary plans and on the transition from the current system to the new one.

The consultation comprises 43 questions, and it is open until 18 October (see [here](#)). The London Forum will be drafting a response, and we encourage member societies to do so too. If there are specific points that you wish the Forum to consider in its response, do let us know.

The Greenwich Society’s Lesley Hodsdon enjoys the London Forum Summer Reception

It’s always enjoyable to meet with like-minded people from the civic and amenity groups that make up the London Forum’s membership, and who care about the many planning and transport issues facing London. We are all volunteers so getting together is most welcome.

It was a magical Summer’s evening (for the 3rd year running, apparently) being on the roof terrace at Cowcross Street in Farringdon. About 60 of us gathered on 22nd August to enjoy wine and nibbles and share issues and ideas, and also to enjoy the views of roof tops of London and see Smithfield Market, St

Paul's, the Barbican and the Shard. To say nothing of hearing the familiar sounds of our Tube trains below running through the tunnels!

The Forum's success is built on active personal relationships that we build through interaction with members and that allow the Forum to shape policies on which we lobby local and national government.



Being able to enjoy this company in a relaxed environment is a real pleasure. It was also a good opportunity to welcome new member societies and new faces from longstanding members. You enrich our volunteer resources and add to the pool of experience we can draw on. Thanks to you all, and a heartfelt thank you to the Alan Baxter organisation which generously provided us with access to this delightful space.

Forum Trustee Darian Mitchell reports on a sharp drop in housebuilding in 2023

Despite a flurry of ministerial announcements about ramping up housebuilding in the Capital, the construction industry finds itself in a very difficult position. Industry sources predict a fall of 25% in housing starts and 19% in completions for the current year. Spending on home maintenance and improvements has also dropped by 11%, having reached historic highs during the pandemic years with people working from home and needing more space. The decline in traditional improvements such as extensions has been partly offset by a growth in energy efficiency measures such as insulation and solar panels. Construction relating to private housing is worth £70 billion per year to the economy, creating employment for 3 million people.

The sector is facing a “perfect storm”. Demand has dropped due to high (and unpredictable) interest rates and the reduction in real household incomes. At the same time spiralling materials costs and the shortage of skilled labour, together with incoherent Government policies have hit new starts. Housebuilders are concentrating on completing homes that are already underway rather than starting new ones. The situation is expected to improve next year, but not by much.

All this has an impact on the social housing sector because providers rely on a percentage of private sales to cover some of the costs of their social housing stock and will be using the same housebuilders who are supplying the private sector. Also, Section 106 contributions from private developments accounts for a lot of affordable housing. Many housing associations are not planning on building any new housing, but are concentrating on making their homes safe and sustainable, e.g. improving fire escapes and removing cladding and installing insulation and heat pumps.

So, all these impediments make the government's target of 300,000 new homes a year look hopelessly optimistic. London will be hard pressed to hit 50% of the London Plan target of 52,000 new homes annually. Needless to say, the construction industry is calling for more government investment. The Autumn budget may hold out some hope.

Briefly Noted

Read your policy documents carefully!

Regular *Insights* correspondent, Gordon Massey (Barnet Residents Association) has drawn our attention to the rejection by Barnet Council of a planning application for an Adult Gaming Centre in High Barnet Town Centre. Although several hundred objections were received, most expressed strong distaste for the principle of gambling, and would carry little weight in the planning balance. However detailed examination of the London Plan and Barnet Local Plan (current and draft revised versions) revealed a number of policies that the planning application would contravene.

The application was rejected (amongst other reasons) because it would adversely affect the viability and vitality of the Town Centre, and Costa Coffee is now occupying the site instead. Read the full story [here](#). The moral is not only to read the policies in the Local Plan carefully, but also to make sure **at the plan formulation stage** that it has the policies necessary to protect your town centre from unwelcome developments.

A recent Inspectorate decision confirms protection for Metropolitan Open Land

Although Metropolitan Open Land (MOL) is supposed to enjoy the same protection as Green Belt, that does not always appear to be the case. However the recent rejection by the Planning Inspectorate of an appeal regarding a site in Bromley should lift the spirits of those seeking to protect MOL from unsuitable development. The scheme was to convert a currently unused sports

ground into a mix of 3-5 storey housing and some less space-intensive sports facilities such as tennis courts. The Inspector quoted from the NPPF that new building on Green Belt (and hence on MOL) is inappropriate and should be refused unless very special circumstances apply. Despite the “tilted balance” applying (for more on this read Mary Hogben’s article in [Insights Issue 7](#)), the Inspector concluded that the benefits of the additional housing did not outweigh the harm that building on MOL would cause. The full Appeal Decision can be read [here](#).

EV Chargepoints on the highway – boon or blight?

In July, the Government amended planning regulations relating to Permitted Development Rights (PDRs) for EV chargepoint installation on the public highway. The change (which came into effect on 26 July) now allows chargepoint operators acting on behalf of a local planning authority to install EV chargepoints without the need for planning permission. Some chargepoints carry large advertising screens. It is unclear whether these are covered by the PDR, and if so, whether Prior Approval is needed for these installations. Their location could be skewed towards places where advertising is likely to be most profitable, not to those where charging points are most needed. Permitted Development may remove such things from scrutiny. Recalling the saga of advertising hoardings masquerading as telephone kiosks, member societies should keep a close eye on these installations and press their councils to do likewise.

Planning for London Programme

Notwithstanding the fact that guidance documents to local authorities on many policies in the current London Plan (adopted in March 2021) are only now being rolled out, the London Plan team at City Hall are already taking the first steps towards the next iteration of the Plan. A series of so-called “deliberative events” was held several months ago to explore the challenges facing London. Write-ups on these events can be found [here](#). These were followed by two “Stakeholder Events” held in the summer, with participation from London Forum’s Peter Eversden and Michael Bach and some member representatives. Write-ups on these are expected before the end of the year.

The Forum will keep members up to date on this initiative, though intensive work on the revised Plan is unlikely before next year’s mayoral election. Should you wish to be informed directly by the GLA team, you can register your interest [here](#). The GLA will be launching a new programme of stakeholder events from September 2023. If you are unable to join in person, they will post videos showing the event and giving the opportunity to comment online.

Round the Societies

Michael Hammerson selects highlights from members' newsletters

The Brixton Society reports that the Hondo Tower application has been withdrawn; a further application is expected. In 2020 Hondo BV, owners of the Brixton Village and Market Row arcades, proposed a 20-storey tower and, despite objections from the Brixton Society, the Victorian Society, Historic England and others, refused any modifications. GLA planners recommend refusal because of adverse impact on the Town Centre Conservation Area and wider area. Current demand for workspace in Brixton is for small affordable units for creative and start-up businesses, not office blocks; and concern remains that if it were to be permitted and failed to attract tenants, the developers will simply convert to residential use under permitted development.

The Dulwich Society report that Dulwich has been voted London's most stylish neighbourhood in an Evening Standard list heavily skewed toward South London. Southwark Council now 'pay' residents to walk, cycle, run and use public transport; its "Better Points" will track your trips and credit you with points to spend at shops or donate to charities. Southwark is consulting on the detail of a Controlled Parking Zone for Dulwich Village, and will remove e-bikes and scooters obstructing roads and paths and fine operators. Report abandoned bikes via Fix My Street

The Friends of Battersea Park focussed during 2022-23 on repairs to the Winter Garden, heavily affected by lockdown when it was used as a playground. The damage was such that it was in danger of being lost without urgent action. It was temporarily fenced off and volunteers helped to replant, FoBP meeting some of the cost, though further funding is needed. They are also working to help local primary schools include visits to the Park in their curriculum.

The Highgate Society's regular Quarterly Meeting with Haringey Planners discussed concerns, including:

Pre-application Discussions and Community Engagement: If this happens at all, it is usually to present the society with a fait accompli rather than genuine consultation.

Conservation Officer and Quality Review Panel reports seem influenced by the planners for reasons unrelated to design and conservation, and the quality of Haringey's design advice is poor.

Planners refuse to bring applications to *Planning Committee*, however many objections are received (150 in one case).

Basements: Despite the growing body of evidence for adverse impacts, basements are still being permitted without adequate assessment.

Conservation Areas: There has been a marked deterioration, due to planning decisions ignoring policy.

Local List: The Society did a huge amount of work on updating this, at Haringey's request, which was submitted in October 2017, but nothing has happened since, despite regular reminders.

The Kew Society wonder what effect interest rate rises etc. have on larger developments such as Homebase Manor Road, still awaiting the Mayor's decision, or the revised Mortlake Brewery Scheme. They await an update on the Kew Retail Park; while the community consultation focused on landscaping and community uses, residents want details of what is planned and local groups will work together to discuss common concerns, possibly using professional consultants.

Peckham Vision are holding an exhibition illustrating 18 years of their work. The Peckham Multi-Storey building, saved by PV from demolition, is now an Asset of Community Value; but its rooftop view, which helped Frank's Cafe to win first place in Time Out's 'Best Rooftop Bar in Europe', remains threatened by tall buildings on the Aylesham Centre site, where Berkeley Homes' plans, which brought much criticism and a 7,000-signature petition, have been withdrawn and new architects appointed.

Phase 1 of the Peckham Rye Station redevelopment to open up the frontage of the Victorian building, an idea of the Peckham Society and PV, has been completed.

The Peckham Townscape Heritage Initiative, which ended with the restoration of 100 Peckham High Street, has been instrumental in preserving Peckham's post-17th century history. The Peckham Heritage Regeneration Partnership brought together local enthusiasts including PV, and the council, to carry out a series of projects to awaken interest in local history, and Peckham Heritage has been set up to carry on the work. PV initiated the idea after realising the potential of the town centre as a 'living museum'. They thank the Heritage Lottery Fund and Southwark Council for their support.

The Teddington Society's application for Udney Park Playing Fields to become an Asset of Community Value has been granted. It is now on the market but they hope it can be brought back into community use.

The Society is concerned by a 'mid rise zone' (5-6 storeys) north of Teddington Station, but consider the Broad Street proposals likely to improve the experience for local shoppers and visitors.

Like many other London Forum members, they oppose ticket office closures and staff reductions, which would severely affect Teddington station.

Thames Water's £300m Teddington Direct River Abstraction plan means draining up to 100m litres of water a day through an abstraction plant upstream of Teddington Weir to transfer to the Lee Valley in East London via the Thames

Lee Tunnel. The plant will be in the Burnell Open Space Woodland Site of Importance for Nature Conservation. The river water taken will be replaced with treated sewage from the Mogden Sewage Works in Isleworth to a discharge outfall, also in the Open Space. Community groups have come together as *Save Ham Lands and River* to challenge the proposals; their comments include:

- There is now water available in deepened reservoirs
- Flooded redundant pits in the Lower Thames Valley could be linked to the Thames
- The Savings announced are minimal.
- TW's own studies say the most severe impact would be from construction and operation of the abstraction and discharge structures; construction will require nine large sites.
- Five acres of wildlife habitat will be permanently lost and a further 12 acres "temporarily" lost.
- The treatment process requires a minimum "sweetening flow" to discharge 25% of capacity treated sewage every day, meaning three times as much sewage will go into the Thames compared to water abstracted.
- TW concede that some polluting chemicals will exceed environmental quality standards, yet conclude it is the "best value" option without considering environmental impact.

West Hampstead Amenity & Transport's Fiftieth Anniversary Newsletter celebrates its work and achievements over the past fifty years: see <https://drive.google.com/file/d/1SuTMcaRt83F1W0O-HaG8r6Vaef1JQ9QX/view>