

LONDON PLAN REVIEW: SUBMISSION BY LONDON FORUM OF AMENITY AND CIVIC SOCIETIES: JANUARY 2022

Matters which should drive the preparation of the next London Plan

- 1. Climate change/sustainability** – 5 years on from last review (2017), post COP26, new issues, shorter timescales for securing significant change (2030 rather than 2040/2050) have changed the context and the urgency for taking action. A new route map and milestones will be needed. Revisit, update, strengthen policies, considering the implications of Net-Zero construction and retrofitting of existing buildings, reduce the need to travel (see below), drastically reduce greenhouse gas emissions and achieve a net increase in biodiversity. This will require by a new, stronger strategy and policies to be covered by the London Plan.
- 2. Revised Population and Household Projections, are required for a new Strategic Housing Market Assessment and scenarios for the quantity, types, sizes and location for new housing to meet London’s needs for next 20 years**, indicated in borough Local Plans, reconciling housing need and capacity. A more proactive and progressive approach is required to better achieving the required types of housing and resilient communities. **Overcrowding levels** and **housing waiting lists** should be monitored and explained for influencing the next version of the London Plan. More social and low-cost rent homes are essential.
- 3. Intensification of development**, especially in Outer London, but also recognising limits in existing high-density pre-1900 developed areas in Inner London. With over 550 tall buildings over 20 storeys in the pipeline, of which 80% are housing, the future sustainability and public acceptability of this type of housing needs to be reviewed. (See “A City for All Londoners”). Need to recognise that tall buildings – such as the 440 residential towers over 20 storeys in the pipeline (NLA: Tall Buildings Survey, 2021), will not produce the right housing mix in terms of tenure, size and affordability, nor produce the kind of housing and communities that Londoners want. LP Policy D9 delegates plan-led approach to London boroughs but clarification is needed on D9 B3 for suitable locations/sites identified in Local Plans being the only areas where tall buildings are suitable.
- 4. Reassess the capacity and roles of Opportunity Areas**, especially reassessing the capacity for the scale of housing and number of jobs and the prospects for securing a significant uplift in public transport accessibility –

many are totally unrealistic in the proposed quantity of development. Many of the SPDs (OAPFs) are 10 or more years old.

[The GLA's status report on the 47 Opportunity Areas needs to be updated to take into account the progress and timescale of the 'Growth Corridor' parts of the Key Information Diagram as a result of the TfL budget situation for each of them as [here](#).]

Strengthening the structure of London as a sustainable city;

- 5. Revive the overall aim of reducing the need to travel, especially by car + to achieve major modal shift by 2030:** This should be the guiding principle for the location of development and improvements to transport in order to deliver a more sustainable pattern of development, which ensures good access to public transport, jobs, health, education, local social infrastructure, local services and open space. This will require securing the right development in the right places and greater emphasis on creating and maintaining **sustainable ten- and, in Inner London, five-minute neighbourhoods** as the basic building blocks of London walkable communities. For that, public transport accessibility level (PTAL) considerations should be strengthened, new measures devised to provide an overall local accessibility score and the identification of gaps in provision.

The new Transport Strategy will need to be revised to deliver proposals for supporting major development in the London Plan or schemes will have to be phased over longer periods, as the London Plan indicates.

- 6. Strengthening town centres as preferred locations for economic activities, social infrastructure and controlled implementation of additional housing.**
- 7. Review the role and functions of the CAZ and how change can be harnessed to help its transformation whilst maintaining its agglomeration benefits**
- 8. Metropolitan Open Land to be protected.** Greater value should be placed on MOL than Green Belt, as it is embedded within the built-up area and meets essential open space and sports needs of London. Unlike Green Belt it is irreplaceable. Indeed, some Green Belt within the urban area should be reclassified as MOL as a more valuable use for London.

9. **'Good Growth' LP policies** must have community buy-in, should, where possible, be community-led and be related to the outcome of recommendations from the 'Office for Place' and however the BBBB proposals are adopted by Government. London Plan policies and Mayoral guidance documents must require community engagement in Local Plan preparation, in pre-application processes and in decision making.

10. **Identify economic growth opportunities and clusters to boost London's economy**, including revisiting proposals for Outer London Development Centres, providing greater protection for industrial land in Inner London from pressures from housing, supporting the agglomeration benefits of the CAZ, and managing industrial land in the rest of London as in the policies of the 2016 London Plan.