

Notes on London Plan 2017.

BCC829

February 2018

1. The Mayor has produced a new version of the London Plan which is out to consultation until March 2.
2. The plan contains a number of policies which do not accord with the views the BCC has adopted. During the consultation we are invited to draft alternative wording for policies we do not support.
3. As there will only be one BCC meeting before the Mayor's deadline I propose to draft out alternative words for these policies and to circulate them to those who wish to comment on Feb 12 or by email.
4. Policies Responded to: (provisional list)

Great West Corridor Opportunity Area 6. p53

Policy SD8 Town Centres. p86

Policy D6 Optimising Housing Density. p117

Housing Targets Table 4.1 p146

Policy H2, (F) Small Sites (1) p153.

Policy S1. Developing London's Social Infrastructure. P202

Policy HC1. Heritage Conservation and Growth. P268

Policy G3 Metropolitan Open Land. p304

Policy SI 1 Improving Air Quality p320.

Policy T9, Funding Transport Infrastructure Through Planning. p436

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GREAT WEST CORRIDOR OPPORTUNITY AREA 6.

Opportunity Area 6 is shown on fig 2.10 as one of a number of opportunity areas related to the Elizabeth Line West.

We note that para 2.1.63 states that "the Mayor will therefore review and clarify the area's potential growth when expansion proposals and their spatial and environmental implications are clearer".

We understand that this paragraph refers to the anticipated completion of the Hounslow Local Plan Review, which is unlikely to be completed before the end of 2019.

The Review has so far set out a "preferred option" which was out to consultation in 2017. It is expected that this will be followed by an appraisal of the realistic possibilities for improving accessibility and connectivity, leading to revised and modified proposals, which will be submitted to an examination in public.

The BCC has submitted a response to the Local Plan Review (BCC820). This took the view that access on the GWR is so poor that much commercial development with planning consents has not been built out. It was also the view that even if the proposed “game changing” rail links were operational early in the plan period improvements to the PTaLs for the potential development sites would not be sufficient for the capacity of the OA to meet the Mayor’s target of 7,500 new homes (in addition to the 1,000 new homes which have received planning consent, but have not been built out).

Furthermore OA 6 is sited on major roads: The North/South Circular roads and the A4/M4 corridor. Although the London Plan does not promote increased traffic it is not likely that traffic flows will decrease.

Indeed, it is possible that the present levels of congestion on these roads will increase if the development shown on fig 2.10 is built, If the expansion of Heathrow does get approval, if the TfL superhighway 9 is built as proposed reducing road capacity or if clean air measures are taken, which lead to unacceptable vehicles by-passing London on the A46.

We would submit that extensive residential development in an OA lining major roads would not meet the Mayor’s policies on Air Quality or on accessibility and connectivity and that therefore applications for residential development on many of the OA sites should be refused.

Many of the permitted buildings within OA6 would be classified as “tall buildings” which cause significant harm to heritage buildings. Tall buildings in OA6 have the potential to harm many heritage sites including The World Heritage site at Kew Gardens, Syon Park, Boston Manor Park and Gunnersbury Park as well as many listed buildings, locally listed buildings, conservation areas and defined character areas.

As an example the tower in the North West Quarter development now harms the view from Syon Park. Because OA6 is on rising ground the impact on the surrounding heritage sites can be severe.

We request the Mayor to consider removing OA6 from the list of OAs set out on fig 2.10.

TOWN CENTRES Policy SD8.

We support the intention behind (Policy SD8A) that Development Plans should take a “town centre first” approach, but consider that the policy needs to be expressed in stronger terms to achieve its objective.

We have noted that in the Brentford area of Hounslow consents have been given for retail outlets in Osterley and on the A4/M4 corridor so that there is significantly more retail outside the Brentford Town Centre than in it. Furthermore, the capacity of these retail outlets have been subsequently increased by consents for mezzanines within the buildings.

The current national policy to allow changes of use to residential has also led to the loss of diversity in our town centres.

We ask the Mayor to amend the policy wording to ensure that town centre uses are not permitted outside town centres.

OPTIMISING HOUSING DENSITIES. Policy DP6.

The BCC fully appreciate that guidance on the appropriate density in new development needs be reviewed.

However, we are concerned that the approach to “optimisation” does not start from a concern to respect the recorded character of our heritage assets.

We request the Mayor to re-draft Policy DP6 to ensure that new development respects the scale, density and height of surrounding areas, particularly where they include World Heritage sites, the settings of Listed and Locally Listed buildings and designated, Conservation and Character Areas.

HOUSING TARGETS TABLE 4.1.

Based only on our understanding of the position in our borough, we think the housing target may not be achievable if all development was constrained by the policies in this plan.

In Hounslow developments required to meet the targets and the consequential infrastructure would need to include land in the Green Belt, land in MOLs and land where air quality is not suitable for residential development.

We therefore ask the Mayor to consider other ways of meeting housing need in the next ten years. These might include promoting a national bill in Parliament to enable further New Towns to be built to assist urban overspill.

Or seeking powers to require boroughs to designate areas of intensification, which would lead to the demolition of privately owned property for comprehensive re-development using CPO powers as required.

We ask the Mayor to consider all options for meeting housing need which fully respect the policies in this plan.

We would seek clarification. Are the targets set for the amount of planning consents granted or for housing completions?

We would also ask the Mayor to have regard for the further expansion of housing need beyond the period of the ten year targets set out in the 2017 London Plan. We believe that his plans for the first ten years will lead to the need for further house building. As this second period comes with the time scale of the 2017 the plan should have policies to meet the continuing need.

SMALL SITES Policy H2 (F)

Our borough is experiencing difficulty in regulating back development on enclosed sites leading to outbuildings being used as unplanned additional units, known as “beds in sheds”

We request that section F of Policy H2 is extended to exclude additional housing units within fully enclosed residential sites.

DEVELOPING LONDON'S SOCIAL INFRASTRUCTURE. Policy S1.

We consider that social infrastructure will not be achieved unless this policy is strengthened.

We request the Mayor to ensure that borough's local plans identify sites to meet the projected needs for education and other social infra-structure without Including sites where air quality is unacceptable or any sites in the Green Belt or on MOLs.

HERITAGE CONSERVATION AND GROWTH Policy HC1.

We welcome the plan's policy for evidence based understanding of London's heritage assets. However, we consider that new development should start from a respect for our heritage.

We request the Mayor to start Policy HC1 with a statement that new development should start from the premise that it should enhance the area in which is to be built having special regard to World Heritage Sites, Listed and Locally Listed buildings, Conservation Areas and Character Areas.

METROPOLITAN OPEN LAND Policy G3.

MOLs in our borough are under threat from development, including social infrastructure development and we anticipate that this threat will become stronger as housing densities rise during the plan period.

We request the Mayor to define “inappropriate development” to include social infrastructure development.

IMPROVING AIR QUALITY Policy SI1.

We support the measures the Mayor has taken to improve air quality but we believe that there are certain areas where it will be exceptionally difficult to achieve air quality suitable for housing, parks and schools. These include areas close to major radial and orbital roads and airports.

We request the Mayor to amend policy SI1 to:

Include a requirement that residential land, parks and schools should not be developed in areas where air quality does meet the standards he seeks.

re-word (2) to require that residential development in Opportunity Areas meets his standards without relying on artificial ventilation, sealed windows and winter garden balconies.

FUNDING TRANSPORT INFRASTRUCTURE THROUGH PLANNING Policy T9.

We are concerned that the improvements to transport infrastructure required to enable PTaLs may be improved to permit densification by being financed by requiring that those developments should “enable” the transport improvements to be built.

This process almost guarantees that such areas will be built to excessive densities incompatible with a proper regard for context and heritage.

We request the Mayor to re-word Policy P9 to clearly state that enabling development would only be acceptable where it can be demonstrated that the proposals would enhance their context and heritage.