

## **DRLP EiP 2010 (LFCAS notes Dec)**

It is a 'Predict & Provide' plan based on GLA Economics research and predictions.

The VISION is inadequate in scope: "to excel among global cities"

The Objectives lack one for reducing the need to travel and London Forum proposed wording.

There should be a policy matrix which indicates the contribution of different policies by chapter to the achievement of each of the Mayor's Objectives in the Plan.

The DRLP paragraph 0.21 in the Overview states an important new decision making basis:

'Planning decisions' policies should be reflected in LDFs and 'LDF preparation' policies should inform planning decisions, with 'strategic policy' providing the context for both.

Structure of DRLP puts policies for one topic in two places - e.g. industrial locations, open spaces.

Lack of cross references (except for **32** at end of Inner London section). GLA resisted others.

Inner London lacks strategic direction and needs more policies for its communities/commercial mix and for developing vibrant and walkable neighbourhoods which is a cross-cutting Plan concept. London Forum sought policy to improve Inner London quality of life and to ensure planning decisions include consideration of the social impact of proposed developments. London Tenants Federation's evidence was significant on the issues that had arisen in new development and estate renewal.

The Central Activities Zone (CAZ) boundary is far too widely drawn to include a number of Opportunity Areas, especially south of the Thames, which have little or no relationship to CAZ functions. In order to incorporate them, large amounts of residential areas are "roped in" where the main function is residential and where most of the policies of CAZ are totally inappropriate.

It is wrong to declare the whole of CAZ as suitable for retail or large-scale office development and London Forum proposed several criteria for sustaining and enhancing the unique variety of uses in the CAZ; not harming the residential and local uses in areas where these predominate; accommodating economic and/or housing growth through intensification and selective expansion in appropriate locations associated with existing or proposed improvements in public transport accessibility, promoting inclusive access including cycling and walking, and seeking to optimise residential and non-residential densities, providing necessary social and other infrastructure to sustain growth, and, where appropriate, contain a mix of uses.

Opportunity Areas lack details in the DRLP about the arrival date of major public transport improvements and the broad phasing of development related also to social infrastructure provision.

A stronger spatial strategy was sought for town centres, with emphasis on regeneration. London Forum challenged (i) the proposed Major Centre at Battersea/Nine Elms as unsustainable and not in accord with PPS4 or DRLP Plan policies in terms of location and size and (ii) the proposed status of Brent Cross.

It is clear that more industrial land has been taken by other uses than had been the intention in the current Plan and that emerging industries are finding it difficult to find affordable premises.

Quality of life and equal chances for all was a section of the DRLP debated at length during the EiP and London Forum placed emphasis on the need to develop social infrastructure. That should include the retention of Policy 3A.15 of the current London Plan which requires boroughs to seek to ensure that appropriate facilities are provided within easy reach by walking and public transport of the population that use them. London Forum suggested an infrastructure accessibility matrix for type of facility and required proximity in

neighbourhoods. Mixed communities policy lacked emphasis on the provision of adequate social infrastructure for goods and services to be within walking distance.

London Forum proposed that before any existing local facilities are lost, Boroughs should review the deficiencies in other social and community facilities and seek to secure the use of the site or building to meet these deficiencies.

The housing supply figures are covered by DRLP Policy 3.3, its associated table of targets and Annex 4. London Forum expressed concern that the numbers had been negotiated downwards by some boroughs, that 1,000 homes had been lost by a presumption against garden development (whereas it should be left to boroughs on a site by site basis) and that the constraints that had resulted in a large number of sites being excluded for housing did not seem to have been addressed to ascertain when or how any of them could be reduced.

It seems unlikely that eighteen boroughs have no long term vacant dwellings at all that should be brought back into use, as the draft replacement London Plan states.

The London Plan team has commenced a fresh approach to the SHLAA/SHMA/HCS process for determining housing requirement and capacity for building and London Forum will be a participant.

Housing density policies and the new form of density matrix were well supported. The change from 'maximising' use of land to 'optimising' it and the experience of problems with sites of excessive density might limit housing densities in future. London Forum pointed out the referral 'threshold abuse' that has been happening reduces floor space for new dwellings. A threshold of 1,000sqm instead of number of units was proposed. London Forum suggested policy and guidance for density in mixed-use schemes will require further refinement, including more consideration of threshold for non-residential floorspace. More achievement of family sized housing will be required. Social rented housing quantity, total affordable housing numbers and family sized dwellings are all in doubt.

For the Quality and Design of Housing Developments, London Forum welcomed the new housing space standards. Objection was raised to the policy presumption against building on back gardens.

Student accommodation policies gave rise to considerable debate but issues were not resolved. The Government's policy on HMOs is not suitable for London where home sharing is inevitable.

Housing benefit cuts, although to be delayed, will have a significant effect in London for displacement of existing families and the topic will need to be examined further by boroughs and the GLA.

Transport policies and associated strategy were reasonable but scrapping WEZ would introduce problems TfL has assessed of increased congestion, more traffic and worse air quality. A legal case on air quality has been initiated.

Economic development opportunities and timescales are not known but assessed positively.

Policies are improved for place shaping, design and architecture but the tall buildings policy is still a promotional one, despite PTAL, and seeks only to avoid considerable harm, not bring benefit. Decisions should be left to boroughs but with better context sensitivity guidance.

Waterways policies have been weakened in DRLP and considerable evidence was given with ELF.

Monitoring and review of the plan implementation is inadequate but a new Implementation Plan has been devised which is comprehensive and can be built upon.

A lot will depend upon the Inspectors' acceptance of arguments for Plan improvements.