



## **CONSULTATION: NEW PLAN FOR LONDON**

I have set out below a response from The Association of Consultant Architects in respect of the above. As the only association that specifically represents architects in private practice, with a remit concentrating on the practicalities of running a business in the private sector, but with considerable experience in the operation of the planning system and appeals, especially in London, we suggest that our comments provide a unique perspective. We have limited our response to more general observations but with a few specific comments relating to the text and diagrams.

### **GENERAL**

We support the transport section, which seems sensible. We welcome the design section but are concerned that its aspirations will not be followed through. It is certain that a discretionary system can provide good/inspiring development (as demonstrated at Kings Cross): therefore a greater degree of flexibility is surely desirable. It is not entirely clear how the Plan will deal with changing market forces - there may be too much control and/or excessive detail in, for example, policies E7 and E11. We are also doubtful about the plethora of acronyms - UGF, SINC, RIGs, AQFAs, etc.

### **SPECIFIC**

- Policy HC3 lists protected "river prospects" but omits the view of the river from Richmond Hill (as also protected by Parliament).
- Policy HC4 refers in paragraph 7.4 to "protected vistas", but these are not defined anywhere.
- In Policy G2 there is a redundant apostrophe referring to the Green Belt and "It's de-designation....".
- Figure 4.3, showing walking distances to Town Centres, is deceptive because the generic circles shown along the River Thames do not seem to take account of the additional walking time needed in West London to find a bridge.

**ANDREW ROGERS AADip ACArch DipTP MRTPIDipEnv&Dev**

Association of Consultant Architects Planning Action Group  
[Redacted]

February 2018