

MSP Strategies Ltd comments

Page: [Policy GG4 Delivering the homes Londoners need](#)

Section: [N/A](#)

Demanding 50% affordability could have the unintended consequence of fewer affordable homes being delivered. Planning authorities should interrogate rigorously viability statements but there is a genuine danger post Brexit, with the housing market softening, of this target holding back delivery. Arguably with completions dropping this is already happening.

Page: [Policy D12 Agent of Change](#)

Section: [D12](#)

I strongly support this. The loss of live music venues and clubs because of stricter licence requirements and new residents is to be deplored.

Clearly the onus should be on the new development to mitigate the impact of existing activity on the new residents.

Page: [Policy H2 Small sites](#)

Section: [N/A](#)

Generally in support - much of outer London with high PTAL is also remarkably low density.

However, in-fill development should be prioritised over so-called "garden grabbing" and that should be made clear.

Page: [Policy H12 Housing size mix](#)

Section: [4.12.3](#)

Two bedroom units have become common for family housing because of the lack of affordable alternatives. This doesn't mean it should be encouraged in the London Plan. For more than one child above 10 a two bed dwelling is not appropriate as "family housing".

Page: [Policy E4 Land for industry, logistics and services to support London's economic function](#)

Section: [N/A](#)

Strongly support protection of logistics centres to provide for last mile delivery.

Land needs to be protected for consolidation centres on the edge of the CAZ.

Close monitoring needs to be maintained to prevent incremental loss of land for potential consolidation centres being lost due becoming a strategic issue.

Page: [Policy G2 London's Green Belt](#)

Section: [N/A](#)

There are some areas of the Green Belt, which are of very poor quality. They can be fly tipping hot-spots, covered in pylons and generally unattractive. There are also areas, which are not formally Green Belt or MOL but are attractive spaces for biodiversity or leisure, which should be protected.

The absolutist approach to defend the Green Belt as enacted in planning documents decades old is one of the reasons for the difficulty in accommodating London's growth.

The London Plan should promise that there be no NET loss in Green Belt. Effectively if a portion is developed then another area of the same size should be designated Green Belt to make up for it. Essentially a land-swap: ugly, developable land out of the Green Belt; attractive land to be designated Green Belt.

Page: [Policy G2 London's Green Belt](#)

Section: [G2](#)

The maintaining of the Green Belt as designated decades ago is one of the reasons leading to London, and the wider UK's, housing crisis.

Much of the Green Belt is of poor quality. Equally other land is high quality and yet is not designated Green Belt.

There should be consideration to de-designate some areas of Green Belt around high PTAL areas if another, equally sized, area can be designated Green Belt: essentially a land swap.

Page: [Policy SI1 Improving air quality](#)

Section: [SI1](#)

'The control of dust and emissions for construction and demolition SPG' 2014 was a good start in addressing emissions from NRMM.

However, technology has moved rapidly forward and the SPG should reflect that.

For example, battery storage technologies can now mitigate or eliminate completely the need for temporary diesel powered generators, while saving business fuel costs.

Any new SPG should spell out a hierarchy in delivering the lowest emission NRMM solutions.

Half of the UK's development takes place in the UK. If London shows leadership, with enough warning the market will produce solutions delivering a triple win: improved air quality, lower CO2 emissions and reduced cost for business.

Page: [Policy SI3 Energy Infrastructure](#)

Section: [9.3.6](#)

There is a danger that this statement will negatively affect the delivery of technology solutions that could have hugely positive climate impact but a very minor and highly localised air quality impact because of CHP plant.

One of the reasons we have an air quality problem was a myopic focus on CO2 emissions, leading to the dieselisation of the small vehicle fleet. There is now a danger that a myopic focus of air quality could lead to a continuation of individual gas fired boilers for large developments rather than a CHP based system, that could save tonnes of CO2 emissions.

For example, the discontinuation of the Greenwich Power Station scheme on air quality grounds will almost certainly lead to increased CO2 emissions from new developments (and a financial impact to TfL).

The holistic whole should be considered on sustainable development and there are sometimes trade-offs to be made.

Clean Air in London has come up with a formula around allowing for a minor air quality disbenefit so long as there is a positive carbon benefit by an order of magnitude. While not arguing for these exact figures such an approach is worth looking at.

Otherwise, there is a danger of the best driving out the good with the unintended consequence of embedding carbon intensive technologies in new developments, which cannot be easily retrofitted and need to be operational for several decades to get return on investment.

Page: [Policy SI13 Sustainable drainage](#)

Section: [N/A](#)

Green infrastructure should play a major role in climate change adaptation.

There should be targets for new developments on how much rainwater is attenuated in new developments.

There should be an assessment on the value of attenuated rainwater to Thames Water when it comes to flood management and mitigating costs for the Thames Tideway Tunnel etc. This should be captured as a revenue stream to deliver green infrastructure in areas sensitive to flood but where development can be delivered.

The London Sustainable Action Plan should be built on and strengthened.

Page: [Policy T3 Transport capacity, connectivity and safeguarding](#)

Section: [Table 10.1](#)

Road User Charging

Strong support for implementation of new road user charging schemes to integrate ULEZ, CCharge and LEZ. There is the technology now available to deliver a dynamic, emissions based RUC to capture of number of policy goals:

1. Air Quality
2. Congestion management;
3. Safer streets

However, stating that the cost of implementing the inner London ULEZ to be "low" appears to be optimistic. Islington Council estimated that just expanding the original ULEZ to cover all of the Borough would cost £174m. The extended ULEZ covers an area orders of magnitude greater.

Expanding the ULEZ gives the opportunity to bring forward emissions based RUC and the technology is available. For example, here is Tantalum's note on the expanded ULEZ:

https://www.dropbox.com/s/y2pd5snhgq6q2xs/Air.car_ULEZconsultation_1.1.pdf?dl=0

Page: [Policy T6.1 Residential parking](#)

Section: [N/A](#)

While wholly supportive of the Healthy Streets agenda and a push to 80% sustainable journeys, the proposed parking standards as applied to car clubs are too stringent.

The parking standards are correct for privately owned vehicles but car free developments for inner London should NOT preclude the provision of car club vehicles.

There are journeys, which are simply not possible through public transport only, especially for the less mobile and those with families. There are also particular errands - such as going to the HWRC or out of town shopping such as IKEA, which necessarily demand easy access to a car. If a totally car free policy for Inner London developments is delivered it will have unintended consequences of being less mixed - it is unlikely that families would want to live there.

Page: Policy T7 Freight and servicing

Section: N/A

The delivery of EV charging will put substantial further pressure on the electricity grid. The GLA must support DNOs who wish to propose investment in their network when if they put forward reasonable business plans to Ofgem for price control periods.

There is also evidence of planning issues around the installation of EV charging infrastructure. For example major logistics companies may not own the freehold on their depots and yet wish to install the necessary charging infrastructure to electrify their vehicle fleet and meet local planning concerns. The London Plan should seek to minimise these delays. Also, battery storage could help to mitigate the peak loads on the grid and help to deliver grid reinforcement during periods of high demand. The planning system must ensure that these can have an easy passage through the planning system.

An example of introducing battery storage to allow for an electrification of a depot can be found here:

<https://crossriverpartnership.org/projects/smart-electric-urban-logistics/>