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Our Ref: ZA45750

2 March 2018

Dear Sadiq,

Draft London Plan: Spatial Development Strategy for Greater London

I am pleased for the opportunity to comment on the Mayor's draft London Plan.

As MP for Erith and Thamesmead I am in the unusual position that my constituency is partly in an inner London Borough (Royal Borough of Greenwich) and an outer London Borough (London Borough of Bexley). The northern boundary of my constituency is the River Thames – the longest stretch of the river in any parliamentary constituency – and there are currently no river crossings of any description.

Given the scope and volume of the Plan I am in the fortunate position of having two Planning Authorities to comment. So I will leave more detailed comments to those professionals feeding into their political leaderships.

Chapter 1 Planning London's Future (Good Growth Policies)

At the strategic level the Plan is an important piece of the response to the challenges London faces in managing expected future growth.

I endorse the emphasis on good growth outlined in the six top line policies, but - understandably – recognise it will be extremely difficult to achieve the right balance on this in the context of a period of intense growth and development.

Last time we saw growth in such an intense manner, it was probably the slum clearance programme in the second half of last century. The huge sums spent to this day, remodelling and demolishing failed estates, should be a sobering reminder that we have



to get it right in the years ahead. It is what we build, and not just how much we build, that will be how the future judges us.

Chapter 2 Spatial Development Patterns

I am pleased to see the Opportunity Area approach for areas of London that will see significant development over the lifetime of the Plan.

In my Erith and Thamesmead constituency there are 2 Opportunity Areas - Thamesmead and Abbey Wood Opportunity Area and part of the Bexley Riverside Opportunity Area. These two OAs, very close to one another geographically, demonstrate so much about potential development in south east London.

Taken together these two OAs have the potential to provide 14,000 new homes and 23,000 new jobs.

Absolutely crucial to the future of both of these areas is the provision of good transport infrastructure, particularly the Elizabeth Line and DLR extension crossing the river from the Becton spur.

It is important to note that the real development action starts when new transport infrastructure is confirmed and realistically on its way.

It was only when it was known that "Crossrail" was definitely coming, and the timescale of its arrival, that developer interest sparked properly. The arrival of Peabody and its regeneration plans for Thamesmead and other developer interest in Abbey Wood would not have happened without certainty about supporting transport infrastructure. So the extension of the Elizabeth Line eastward has the potential to similarly stimulate required development in the Bexley Riverside Opportunity Area and in the corridor through towards Ebbsfleet.

The Mayor recognises the extension as a strategic infrastructure priority, and an important component in the matrix of London's relationship with the wider South East. So I welcome the Mayor's commitment to support Bexley and the adjoining Kent authorities in seeking a Government-led extension of the Elizabeth Line, but I worry this reliance on central government will put the project on the back burner, just when the Mayor is seeking to accelerate new house delivery by 2029.

Given the competing demands for Crossrail 2 and other infrastructure projects in the capital, I would welcome some serious consideration with partners as to whether there



are other and possibly innovative ways finance could be raised for the project.

While I welcome that the Planning Framework should explore the level of growth that could be supported through significantly enhanced bus services and priority measures, it is journey times into London that will speak loudest to housing developers, and that is where the Elizabeth Line is key.

Within the Thamesmead and Abbey Wood Opportunity Area I agree the importance of revitalisation of Thamesmead and Abbey Wood centres, along with the focus on Plumstead High Street as part of development aspirations.

I welcome the recognition of the need to accommodate the expected growth by planning for and upgrading utility infrastructure - in particular water and electricity supply, broadband and a local heat network. These utilities have been a source of complaints by constituents since I was first elected in 2010.

The Plan also rightly recognises that, in view of the low-lying nature of parts of the area, particular attention should also be given to flood risk management. I have been concerned at the evidence of flooding – as yet not fully resolved - during the construction of the Elizabeth Line between the Plumstead tunnel portal and the new Abbey Wood station.

Within the Bexley Riverside OA my constituency covers Belvedere, and parts Of Erith. London Borough of Bexley now has a growth strategy in place, which has been drawn up with cross party agreement. I would hope that there can be a positive dialogue between the Mayor and Council to look at how the Mayor's London Plan and the Council's Growth Strategy might co-exist in the Borough's and London's interest.

I support the idea that industrial uses are retained and intensified, and form part of the mix in redevelopment proposals. After all, local jobs are vital and minimising the commuting journey is good for other components of the Plan.

Chapter 3 Design

I welcome what the plan has to say about inclusive design. I would advocate wider wheelchair accessible doorways to be the norm.

Chapter 4 Housing

The Plan is informed by the GLA's 2017 London Strategic Housing Market Assessment, and that assessment has identified a need for 66,000 new homes per year, which is ambitious.



There may be differences of opinion between the Mayor and boroughs over whether this is achievable, but as worrying to me is the need to tackle the construction skills gap, not least in the context of the possible terms of our exit from EU.

One of the stand out statistics for me in the SHMA relates to demographic trends, suggesting London's population is projected to increase by 79,000 every year, reaching 10.5 million in 2041.

This rate of increase is actually substantially less than the rate of population growth in the last decade and shows how our response as a city, particularly re housing challenges, has fallen short in the past. It would seem we are going to have to run very fast to catch up with past failures.

And it is not insignificant that the fastest rate of population growth is expected to be among older age groups. I am struck by the figures that by 2029 the number of older person households (aged 65 and over) will have increased by 37 per cent, with households aged 75 and over (who are most likely to move into specialist older persons housing) increasing by 42 per cent.

I am pleased to see Plan's acknowledgement that appropriate accommodation is needed to meet the needs of older Londoners who may wish to downsize, move closer to family or friends or be closer to services and facilities, but may not want to move into specialist older persons housing.

There is an important role for new, non-specialist residential developments to play in providing suitable and attractive accommodation options for older Londoners, particularly developments in or close to town centres, near to relevant facilities and in areas well-served by public transport.

I welcome the new definition for Gypsies and Travellers, as it is a great concern that Section 124 of the Housing and Planning Act 2016 removed the duty on local authorities under the Housing Act 2004 to assess the accommodation needs of Gypsies and Travellers in their area as a distinct category.

I am concerned about the draft Plan's suggestion that 2 bedroom units could be considered as family provision. Although many families may live in smaller two bedroom homes, this is because of the high cost of accommodation rather than because it meets their needs. Families come in all shapes and sizes and the Plan should reflect that

I do not agree with the Plan's presumption in favour of back garden development without



any detail of the circumstances in which this may or may not be appropriate. Residential gardens are important in reducing surface water flood risk, as well as helping cleanse the air we breathe. With the huge issue of air quality in London, the loss of gardens will only make this worse. Our green spaces are the city's lungs. I would like to see local authorities making decisions about when or if it's right to build on gardens rather than have a blanket London wide policy.

I support the introduction of a strategic affordable housing target of 50% and the proposal to review developments that do not meet the threshold approach. However there needs to be a new definition of "affordable". At present the term has lost its meaning and will not deliver homes for those that need them. The public has lost confidence in the term "affordable housing" to provide the low cost homes needed by them and their families. "Affordable" should be linked to income and not market rents.

Chapter 9 Sustainable Infrastructure

I am very pleased to see the commitment and the proposals to clean up London's air and encourage sustainable development.

I support the PLA and Transport for London's Pier Strategy, which promotes extending river services to East London and its growth areas to encourage modal shift to the river. I would advocate for a pier to be introduced in Thamesmead and in Erith to provide the river transport option.

Chapter 10 Transport

I have commented earlier on the eastward extension of the Elizabeth Line, and the extension of the DLR from Galleons Reach to Thamesmead and on to Belvedere.

I also commend the potential extension of the London Overground from Barking Riverside to Abbey Wood. On this proposal there is a possibility of completing an orbital link on the London Overground through Lewisham and on to Denmark Hill.

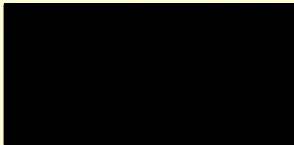
Measures to use planning to restrict and reduce car usage are certainly the way forward in the longer term. I do feel the outer areas of London, including in my own constituency, are not sufficiently well served by public transport for this to be a viable option yet. More intensive development around stations can work in many parts of London, but with relatively poor bus connections in many parts of outer boroughs, I am far from convinced that this approach would work in Bexley.



Chapter 11 Funding the London Plan

One final point I wish to make is on behalf of the local boroughs charged with handling planning for a large increase in development in their areas to meet the London Plan objectives. I believe we should not lose sight of the challenges set to local authorities and their planning departments/operations to manage this surge in planning. At present many planning departments are already stretched and not able to do more than just process applications. They don't have the capacity to place shape and plan. Could consideration be given to the Mayor's office providing a planning expertise bank for Local Authorities to access in times of high volume?

Yours sincerely,



Teresa Pearce MP
Member of Parliament for Erith and Thamesmead