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Draft London Plan Consultation
Planning & Regeneration
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Wimbledon Society

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Dear London Plan Consultation Team

DRAFT LONDON PLAN 2026: CONSULTATION RESPONSE

The Society's response to this consultation is set out below, following the same order as in the draft text.

Generally:
That the Plan is much shorter than before is to be welcomed, but it is still too long and could be pruned.
The numbering and referencing similarly could be simpler.

HOUSING TARGETS: A major question mark concerns the Resources and Funding aspect that should surely underpin such an important plan.
This is largely absent, which undermines belief in much of what is being proposed.
Attempting to 'piggy-back' planning gains (affordable housing etc) onto what appears to be a very slow development market is at best highly unlikely to deliver the kind of outcomes that London needs.
As developers only build what they can sell, there would appear to be a very substantial gap indeed between what the market can provide, and the desired housing target figures. Are they just fantasy?
This gap is seen as so wide that it calls into question the whole basis of the plan for housing growth.
Are there enough people in the general population with the funds necessary to buy a home, even if the targets are delivered? The clear answer is no, so the Plan fails to resolve this.
This fundamental point needs to be addressed if the London Plan is to achieve its goals.

ENERGY: Whilst it is a matter more for Central Government, the acknowledged gap between the 'energy' aspirations of the Planning system and the Building Regulations remains very wide.
Which raises the question, should planning eventually relinquish its long-time championing of energy matters to the Regs? Or should it continue to set a more aspirational and sustainable target, following the (as it happens local) "Merton Rule" that the Society strongly supported more than twenty years ago?(see 3.7)

LINE BY LINE RESPONSES:

1.19 "New housing is to be net of greenspace needs" is welcomed, if it means that building on open spaces is to be prevented. However, this needs to be more clearly stated in Section 5.

1.22 That greater funding is required to deliver affordable housing is agreed, but the Plan does not explain how this is to be achieved (see above).

1.23 That higher housing densities are required should be subject to the protection of local character and heritage, eg conservation areas and their immediate environs.

2.4 The proposals that some Green Belt (GB) land will be needed to deliver new housing is a matter for the outer Boroughs and others to consider.
But if this is proposed, then it has to be accepted that some GB land is highly unsuitable for housing (eg food growing, pollution, high nature scores, flood-prone, inaccessibility etc etc).
Additionally, the discussion appears to be solely on the narrow basis of the suitability or otherwise of individual sites for development.
There appears to be no wider view, for example whether there is any merit in adopting a "finger plan" approach (cf Copenhagen) rather than continuing with a concentric GB band as in the past.

Fig 2.1 Much of the Borough is designated an "Environmental Opportunity Area", and also within the "South London Intensification Programme", but these are not explained.
It would be essential to ensure that any development in such programmes was subject to respect for established local character and environmental heritage.
The footnote suggesting that greater height limits in Wimbledon Town Centre could be accepted is not agreed. The quoted 5 -10 storeys should be the maximum, given the presence of two conservation areas in the centre.

MBUL 1: A/2 That the intensification of land use is to be subject to heritage and local character is welcomed, but this needs to be strengthened, and not relegated to being below other policies eg targets, where it can then be routinely ignored.

1B/5/iii The Proposals to enhance Greenspace are welcomed, but again, resources need to be identified.
On a wider financing point: much Metropolitan Open Land (MOL) (apart from the Royal Parks, etc) is currently financed by the Borough in which it is located.
But such large open spaces are also used by the residents of neighbouring Boroughs, who pay nothing towards its upkeep. This could be seen as illogical. Is there a case in the future for the GLA to take responsibility for the financing of the all the MOL currently financed by the Boroughs?

A3 That Boroughs must use the London Small Sites Design Code should not be agreed.
This approach, telling designers what to draw, what "designs" are supposedly acceptable, is both too prescriptive, and limits innovation. And could be seen perhaps as insulting.
The present draft code regrettably appears to sanction the significant lowering of daylight standards to adjoining gardens, and favours timid/tepid "keeping in keeping" elevational ideas.
Planners are not trained to design.
The planning system should scrap the use of long-winded prescriptive design codes, and instead adopt simple measurable 'urban design standards' and criteria.
This leaves the designer to work within their framework, create and innovate.
These standards include protecting daylighting (to adjoining sites not just windows), preventing shading of solar arrays, building lines & heights, tree protection, privacy distances, sustainability, site coverage % and so on.
Being measurable, rather than matters of taste or opinion, they can be quickly understood, and their use would both simplify and speed up the planning system.

2.26 It should be made clear that the "sensitive areas" being referred to – presumably including conservation areas, heritage buildings – should be excluded from prescribed "design solutions".

2.32 Crude diagrams of favoured newbuild layouts are at best unhelpful, and should be dropped in favour of setting basic measurable standards as above.

2.34 Omit all reference to Design Codes, as above.

2.37 "Architectural Style" should (virtually) never be prescribed in the planning system (see below).
The Plan should always use the term "Urban Design" rather than "Architecture".
Matters of art and of style and of character should be left to the scheme architects and designers.

B/4i Calling for "exemplary design and architectural quality" is undeliverable, a confidence trick on the gullible, and it has never worked.
Not only is it unmeasurable, but it constrains the architect's freedom to design, to find creative answers to complex problems.
As an example: in a local street of semi detached suburban pre-war houses there is a 1937 "modernist" house.
It is quite different from its neighbours, and does not in any way "fit in architecturally".
Yet it is the only one that is (rightly) listed. (95 Salisbury Road, Worcester Park: Connell Ward & Lucas)

3A/2i Ditto

Fig 2.7 This shows a notional building of 9 floors, with only one stair, which is totally unacceptable.

It should be a basic principle of design: an alternative means of escape must always be provided. Up to perhaps 5/6 storeys, one integral staircase plus the fire service external ladders (assuming accessibility) can provide this.

But above that limit, two quite separate stairs must be provided: the drawing should be amended.

In the same way that the planning system has (for nearly 25 years) taken the lead in promoting far higher energy and sustainability standards than those required by other Regulations, so should planning take the lead in the safety of a building's occupants.

2.58 Calling for a "High Architectural standard" is an absurdity, and should not be accepted (see above). Urban Design by contrast should be a major element in the planning system: (see MBUL6 below)

MBUL4/A1 Dependable Electricity depots and networks will be central to a future city, yet loss of power will happen. Local Plans should therefore be required to provide for this resilience in ensuring continuous supply.

Noting that both the Borough's electrical 'depots' are in flood-prone sites.

On Energy, Local Plans should be required to specifically encourage solar, and prevent its shading by new development, via the use of neighbourliness standards.

On Flooding, Local Plans should be required to propose and list specific flood alleviation measures to reduce risk in current flood prone zones. Not just policies, but action should be required.

On Digital, this essential service is currently delivered by a jumble of un-coordinated masts & their attendant crude equipment boxes of various sizes.

These blight the locality and generate objections, both slowing down the planning process, and the delivery of the essential technology.

Instead, the London Plan should work with the operators and industrial designers to create a more rational and properly designed system, that Local Plans can then accommodate.

E2 The safeguarding of the Crossrail 2 rail project is noted, but the safeguarding currently does not seem to extend far enough.

The result is that the possible relocation of Raynes Park Station, and solutions to the two potentially disruptive level crossings in the Motspur Park area, are not able to be protected. (see also 2.75)

Add: The London Plan should specifically encourage and facilitate the pedestrianisation by Local Plans of High Streets/town centres, for safety, economic resilience, air quality, community.

MBUL6 A1 The promotion of Design Codes should be dropped – see above. If they were adopted, they would quickly become the requirement, the only way forward, no other design would do.

Such a stultifying approach should have no place in a London that has prided itself on innovation.

There is no evidence that requiring detailed compliance with pre-ordained pattern book drawings delivers a better outcome than the alternative of setting basic urban design standards.

On the contrary.

The aim should be to let the architect free to design within those basic parameters: see above.

B1 That project designs should reflect local distinctiveness is accepted in urban design terms of scale, building line, height etc.

B3 "High Quality Architectural design" is undeliverable & should be dropped from the Plan (see above).

MBUL7 F Requiring Local Plans to screen sites in Archaeological Priority Areas is welcomed.

2.100 The current London Views Management guide is now inadequate and needs revision. For example:

- Instead of a single narrow viewpoint, the full width of the view should be protected:
- Instead of the view being only taken from the top of the hill, the existing view from further down the slope should be the protected viewpoint:
- Instead of a flat "ceiling" line (setting the maximum heights of intervening buildings) a deeply dished line should be used, to prevent the Cathedral dome (and Palace of Westminster) being seen as perched on a modern building rooftop.

There are a number of panoramic view of central London from other viewpoints, (eg Church Road/St Mary's Road) and these should also be considered for protection in Local Plans.

MBUL8 2.112 Means of escape should also be included to protect the vulnerable (see fig: 2.7 above).

B/1A The London Plan should require Local Plans to promote the pedestrianisation of 'High Streets', and locations where pedestrians congregate, for safety, air quality, economic resilience, community.

MBUL 10 2.12 Whilst the London Plan spells out the requirements for Fire Engineers to be qualified, it is noted that there is no such requirement for London's Planners.
Recently, one Borough was found to have no RTPI qualified planners in their planning team.
Should not the London Plan advocate that each Borough should have a designated Chief Planning Officer, so that the planning advice that Councils receive is from a team led by a suitably qualified person?

2.129 Fire safety is not solely dependent on cladding, which is a matter that the planning system is not currently equipped to consider.
It should also require the provision of alternative means of escape for all buildings (see 2.7 above)

HOUSING 3.7 See the point at the start of this letter on housing targets.
The Plan will not command respect if this fundamental aspect of delivery is not fully justified.

Table 3.1 Shows the 10 year Merton Housing target as 17,455, all on 'Brownfield' land, so this means presumably that there is to be no building on designated open space in the Local Plan.
The London Plan should make this clear, that all designated open space is to be protected from new housing (or other) development.
Given that in the past few years, housing development has been permitted on four of the so-called 'policy protected' designated open spaces in Merton.
Saying one thing in the Plan, and yet doing another, risks public disenchantment with planning.

Table 3.2 The proposed percentages of affordable housing for a range of projects is currently too complex and confusing, and complicates the pre-app discussions. It needs simplification.

GLE 11 Add that the adaptation and re-use of existing buildings should be prioritised over unsustainable demolition and rebuilding.
And that new development should be specifically designed to be easily adapted to new uses in the future, noting headrooms, floor loading, structural flexibility.

GHR5 Add that Local Plans should include and list specific proposals to alleviate both surface water and riparian flooding in the defined zones, including rainwater attenuation, capture and slow release.
Currently Local Plans have high sounding "policies", mainly affecting new applications, but the words in plans need to be made real by requiring Council action on sites, where there may be no development projects.

GHR6 The proposed use of a valuation system to calculate the compensation value of the lost trees should not be agreed.
This valuation protocol, used in legal cases, is purely monetary, and is highly complex, & expensive.
It is of use only when (say) a vehicle demolishes a street tree, and compensation has to be paid.
Trying to use it in planning would lead to inordinate delays, yet another 30 page consultants report, and is too cumbersome. This valuation system should not be used in planning.
Instead, all Local Plans should be required to follow a simple London-wide tree replacement protocol, based on trunk girth replacement.
As an example, if the combined trunk girths of (say) 3 mature trees lost on a development site came to (say) 2 metres, then the replacement trees' trunk girths should match that figure.
Assuming that the new trees were all Heavy Nursery Standard (12 – 14cm trunk girth, being mostly the size used in streets) then there should be around 14 –16 replacement trees.
If the development site could not accommodate the required number, the developer would pass the unused trees (or a financial equivalent) to the Council to plant locally.
This would be in place of the current, and highly discredited, "one new-for-one lost" policy.
An additional option would be to require double in conservation areas, treble if there was a TPO.

GHR6 Local Plans should be encouraged to implement small scale tree planting grants to householders, to

plant in their own gardens, financed from CIL payments &/or BNG.
Increasing the tree stock is currently limited by the expense of planting in streets (c£400 each) and it seems clear that tree losses are greater than the current plantings.
Encouraging back garden planting of appropriate species could help to stem current losses.
It would also act as a community focus, and could lead to further "green" initiatives.

E Exporting BNG to distant sites does nothing for London, so all off-site BNG gains should be accommodated within London.
The GLA and Boroughs acting together should accordingly identify a range of specific 'acceptance' sites, that could then accommodate these BNG gains.
They could then put in place the required long term 30 year husbandry and maintenance regime, which could prove problematic and difficult to monitor for ad hoc sites.

GRH7 Table 5.1 The introduction of yet another complex calculation with its attendant 30 page report, does not make the planning application process simpler, as HMG & others would wish.
Instead, a much simpler rule of thumb metric should be created, easily able to be calculated and checked by the local civic society, the planning officer and the applicant.

GRH8 All types of green space are valuable in connecting people with nature, but the Plan implies that it has to be publicly accessible green space. This should not be accepted.
As 5.96 says, all greenspace is valuable, therefore the Policy must be amended, to cover the designation and protection from development of all non-public greenspace.
It would be absurd for example to not formally protect from development those London Squares that are private, and not accessible to the public.
Similarly, great open spaces that are private (for the moment, but this could easily change) or semi-private still act as the 'lungs' of London.
Privately owned sports grounds, yet used by the public, are an essential part of the total London greenspace. Losing these to lucrative development would be disastrous to sport, health, nature.
Increased population, and a rapidly over-heating climate needs to be supported by more than just 'public' greenspace and nature.
The London Plan should take a clear line that all such green space, whether public or not, is to be protected from development, and this should be a firm requirement in Local Plans.

GRH9 On waterways, whilst protecting their open character etc is to be welcomed, Local Plans should be required to produce proposals to improve water quality, adapt the watercourses to attenuate flows, create alleviation zones, and to counter local flooding.
Positive action is needed from Councils, as currently there are "policies" but no apparent commitment to action, which is needed to address the real concerns of housing now in flood-prone zones.

GRH10 Air quality where pedestrians congregate is currently not up to the standard, and positive measures are need to lessen pollution, not just "monitoring".
The encouragement of pedestrianisation of High Streets needs to be part of the London Plan.(see E2)

B4 Add: High quality **Urban** Design.

PV3A4 The emphasis should be on "the supporting of change of use and redevelopment of surplus commercial space".

A6 Add: …and public realm, including pedestrianisation.

PN6A Whilst the Plan says that "MOL is land that should remain permanently open etc etc, unless very special circumstances exist", the effect of the last 5 words effectively negates the whole policy.
Developers will always construct a case for such "special circumstances" with the result that MOL will be built over, and the basic Policy will be seen as a just a cynical mislead by the public.
Instead, the Plan should state unequivocally that MOL is not to be built on, and the last five words omitted.

B The option to redraw boundaries similarly is just another device to allow development, and should

not be included in the Policy. It is always possible for the site owner (including Councils) to manipulate an MOL site so that some parts can be classed as "unused" or similar, so as to build on it.

C1/I The notion that defined MOL has to be publicly accessible is wrong, and should not be accepted.

C2/ii The statement that MOL can be released if it is not publicly accessible is both illogical and wrong, and should be omitted. Whether an MOL is publicly accessible should be irrelevant to its retention as open space. Its function as a "London lung" cannot be affected by its accessibility.
Targeting "member only" golf courses for development is both divisive, and short-sighted.
"Member only" green spaces, privately owned sports grounds and golf clubs can quickly change to being fully public after a single meeting of those members.
Such a Policy runs counter to those that support the protection and promotion of sport and nature.
That a significant open space could be protected for one group of players and not for another group of equal size is surely absurd.

F That 'Strategic benefits' could allow development in MOL is not agreed.
This would allow housing etc to be built, and the MOL designation would become meaningless, and bring the planning system into disrepute.

PV8 Consideration should be given to the protection of some additional panoramic views, including from the junction of Church Road and St Mary's Road in Wimbledon.
The existing LVMF is now outdated and needs revision (see MBUL7F above).

Additional comment: One major omission is the spelling out of basic "Neighbourliness Standards" that all London Plans and Boroughs would then have to follow in dealing with planning applications.
Currently, there seems to be no proper understanding in Borough planning teams of the need to respect and protect the legitimate amenities and entitlements of the adjoining sites.
The result is that new development is being approved which unreasonably diminishes the normal enjoyment of adjoining sites and their occupants. This leads to objections and even more delay.
What is needed is a simple set of measurable criteria, which all Boroughs would be required to adopt in their Local Plans.
Daylighting angles (43 degrees from the top of a notional 2m high fence to all site boundaries, not just windows), privacy distances (18 -20m) between windows, the 45 degree rules, protection of neighbouring solar arrays from shading are some examples.
Incorporating these into a simple Annexe H is suggested, requiring all Local Plans to follow these common standards.

In Summary, the Society considers that the emerging London Plan still needs to address these major issues:

* Financial support for the achievement of the housing targets is yet to be demonstrated:
* The protection of MOL and greenspace generally from development is currently poor & inadequate:
* The promotion of so-called "architectural quality" is mistaken and undeliverable:
* The promotion of "design codes" is mistaken, and they should be scrapped in favour of simple guidance:
* Basic urban design and simple London-wide neighbourliness standards still need to be formalised:
* Ensuring that new development respects local character, heritage and building scale is still inadequate:
* The Policy approach for the "Climate change adaptation" of the existing building stock is still unclear.

Yours Faithfully

Chair, Wimbledon Society Planning & Environment Committee
Please send all correspondence by email to: info@wimbledonsociety.org.uk

cc London Forum
cc Civic Voice