

KEF comments on the London Plan, a summary

Your comment on the London Plan has been successfully received

Policy G1 Green infrastructure

We agree with the broad conservation and enhancement objectives, but would prefer a target date for 50% green space far sooner than 2050!

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Policy G2 London's Green Belt

We support protection of and enhanced access to the Green Belt and other green spaces, and appropriate improvements that would protect biodiversity in these spaces.

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Policy G3 Metropolitan Open Land

We agree on the need for and importance of access to MOL, and particularly its contributions to public health, wildlife habitat and biodiversity, the urban landscape, flood mitigation. We have some concerns about what "appropriate development" would entail and would oppose encroachment on these valuable green spaces. We also have concerns about "land swaps" / biodiversity offsets, as wildlife and wildlife corridors are not so easily swapped and changes could result in losses of species. .

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Policy G4 Local green and open space

We strongly support protection and increase of local green spaces.

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Policy G5 Urban greening

We strongly support all steps that would increase the amount of greenery in our city and the proposed requirements on developers.

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Policy G6 Biodiversity and access to nature

We support protection of sites of importance for biodiversity but not at the expense of less important sites, which also have value to local people offering them access to nature and trees, helping to mitigate flood and air pollution, and providing wildlife corridors.

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Policy G7 Trees and woodlands

We strongly support more trees in London for all the eco-services they provide, and suggest that increased trees provision be coupled with public education about their benefits to counter a public perception that trees are just a nuisance (dangerous to house foundations, cutting out light, dropping leaves in autumn, bird droppings etc). Climate change and the heat island effect makes trees and woodland even more desirable.

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Policy G8 Food growing

We strongly support more food growing in London, for the health and environmental benefits, and also because allotments and community gardens are places where diverse communities can meet and work together. Community gardens and allotments should have some protection.

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Policy SI1 Improving air quality

We agree that London's air quality must be improved, and soon, and that new developments and councils must take steps that would help to reduce pollution, for example by reducing private car use and road traffic more generally.

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Policy SI2 Minimising greenhouse gas emissions

We agree that London and new developments should take all possible steps to minimise greenhouse gas emissions.

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Policy SI3 Energy Infrastructure

We support an increase in renewable energy sources both in new developments and retrofitted in older buildings . Solar photovoltaics and solar thermal are our preferred renewables as they are clean, unobstrusiv, and very efficient in the right place. There are limited sites in London suitable for wind and hydropower, and though equally clean and renewable, they do provoke much more opposition mainly on aesthetic grounds. .

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Policy SI4 Managing heat risk

We agree that some aspects of modern building design can lead to overheating, and that this is likely to worsen as the climate changes, particularly in built-up areas. We would support the low-energy-intensive measures suggested, such as solar shading (e.g. brise-soleils and blinds), building orientation and solar-controlled glazing, and oppose mechanical cooling such as fans and air-conditioning as in the long term they simply exacerbate the problems of energy use and emissions.

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Policy SI5 Water infrastructure

We agree that waste water must be carefully managed in order to maintain the cleanliness of our rivers and waterways.

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Policy SI7 Reducing waste and supporting the circular economy

Yes of course waste should be reduced, wherever its source - residences, offices and other businesses, building sites - and what cannot be reduced should be recycled or re-used as close to source as feasible. We would support national standards and infrastructure for recycling to reduce public confusion and increase recycling.

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Policy SI11 Hydraulic fracturing (fracking)

Totally support ban on fracking in London - unsuitable in London (or anywhere) because of risks to water supply, destruction of local environments, and contribution of non-renewable energy to greenhouse gas emissions

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Policy SI12 Flood risk management

London should take the opportunity of flood risk to increase green spaces and trees that can absorb water.

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Policy SI13 Sustainable drainage

We support management of rainwater by SUDS and SUDS as an integral part of every new development.

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Policy SI14 Waterways - strategic role

We have concerns about using rivers and waterways as major transport routes as river craft are inefficient in their energy use and tend to produce a lot of air pollution.

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Policy SI15 Water transport

We have concerns about the environmental impacts of water transport - though accept that it might be efficient for bulk transport of good in long barges.

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Policy T1 Strategic approach to transport

We agree that the London transport system needs **rebalancing** towards walking, cycling and public transport, and investment in improving street environments to make walking and cycling safer and more attractive, and providing more, better-quality public transport services to ensure that alternatives to the car are accessible, affordable and appealing. This would help to clean the air and reduce road traffic and car use. Currently too many of London's town centres, including ours in Kingston, look as if they were designed just for cars and are unwelcoming to pedestrians and cyclists.

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Policy T2 Healthy streets

We support the healthy streets criteria and would like to see them implemented as soon as possible!

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Policy T3 Transport capacity, connectivity and safeguarding

We support improvements to public transport and active travel - but would like to see them implemented rather sooner than some of the targets suggest

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Policy T5 Cycling

We agree that development should facilitate and encourage cycling, and reduce car dependency and the health problems and air pollution it creates. We look forward to the proposed London-wide network of strategic cycling routes.

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Policy T6.3 Retail parking

We support local shopping centres well connected to public transport and cycling and walking networks, to reduce the need for travel by car and car parking and the reduced air quality that goes with road traffic.

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Policy T8 Aviation

We do not support additional aviation capacity and airport expansion in the south east of England or anywhere, believing that there are better and cleaner alternatives to air travel and that the business case for expansion of this sector has been much exaggerated.

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Overview

We do not necessarily accept the case for London's growth, and doubt very much that the amount of housing development can be achieved without unacceptable damage to London's character and loss of green space. There is much more affordable housing in other cities, which would benefit from more investment, regeneration and jobs much more than London could.
