

# GREATER LONDON AUTHORITY

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**Date:** 12 October 2009

Dear Jenny

### **London Plan Review Initial Proposals: Mayoral Response To The London Assembly**

Thank you for sending me on 14 July 2009 the Planning and Housing Committee's response to the initial proposals document for review of the London Plan. This letter constitutes my formal response required by section 335(1B) of the Greater London Authority Act 1999 (as amended).

I am, as ever, grateful for the work done by your committee in considering the proposals, and in making suggestions about ways in which they might be improved. The issues you have raised are extremely important ones, and they have been very carefully considered. Some of them I suspect will be the subject of further discussion and debate at the public examination of the proposals.

Before turning to the substance of your response, I have to take up the implied suggestion that I am in some way depriving the Assembly an opportunity to comment on the emerging London Plan. I believe the course I have taken is exactly the same as that of the previous Mayor when he was preparing the first version of the London Plan – issuing an initial proposals document for consultation with the Assembly and the functional bodies and then releasing a full draft Plan for public consultation. This is the process set out in the GLA Act. I am not therefore depriving the Assembly of an opportunity to comment they have enjoyed before, and you will have further opportunities to participate in the process both during the public consultation stage, and at the examination in public.

I will respond to your comments using the headings and paragraph numbers in the Committee's formal response.

#### *(4) Mayor's approach, vision and objectives*

I hope you will agree that I have succeeded in both making the document shorter, more strategic and easier to use on the one hand, and sufficiently detailed on the other hand. I believe that the cross-cutting themes and issues, and their interplay, are easier to navigate in a crisper document. You will see that I have sought to identify the inter-relationships between these issues by appropriate cross-referencing.

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As you will see, I have proposed some changes to the draft vision and objectives as a result of comments from the Assembly and others. I believe that all the issues you refer to in paragraph 4.6 of your response are addressed across them. In addition, you will see that the policies dealing with quality of life have been specifically identified in the first chapter of the draft Plan.

- *Mayor's vision and objectives*

I am grateful for the Committee's support for my vision for London and six associated detailed objectives outlined in the draft Plan. I have sought to explain a little more the practical steps that will have to be taken to realise my vision and plan for continued growth in Chapter 1 of the draft Plan.

I have not made the specific change to the first detailed objective suggested in paragraph 4.16, as I consider the protection of open spaces is implicit in meeting the challenges of economic and population growth in ways that ensure a sustainable, good and improving quality of life for all Londoners. If I referred to all the aspects that make for a good and improving quality of life, the objective would become unfeasibly long and cease to be high-level. You will see that protection of open and natural environments are highlighted as one of the policies supporting quality of life in paragraph 1.52, and that the point you make is embodied in the statement of overall spatial strategy in paragraph 2.3 of the draft Plan.

I do not agree that the draft vision or objectives do not cover issues covered by the legal duties – housing is embraced by objective 1 (on the same principle as open spaces), health inequality is explicitly mentioned in the same objective. Social development runs through the objectives, but perhaps particularly in the first and third. The draft Plan seeks to make clear the policies that implement each of the detailed objectives.

- *Sustainability appraisal*

I am grateful for the Committee's welcome (para. 4.17) for the approach we have taken to integrated impact assessment (IIA). This has proved a very valuable process, and has resulted in changes that I think have significantly improved the draft Plan.

The IIA is an assessment of the draft Plan. It is of course informed by the first London Plan and the extent to which its objectives and targets have been attained (and this was the subject of the initial baseline report that started the assessment process), so to this extent these have been taken into account. The IIA report is not the appropriate place for a progress report on previous versions of the London Plan (paragraph 4.18) – this is the subject of detailed Annual Monitoring Reports.

Monitoring progress will of course be essential (para. 4.19) – this is at the heart of the “plan, monitor, manage” approach to planning which is explained in the draft Plan. I recognise that planning is a continuous process, and that if developments mean that approaches and policies set out in the draft are no longer appropriate, new ones should be brought forward.

I have sought to deal with each of the issues highlighted in paragraph 4.21 in the chapter of the draft Plan dealing with context and strategy, and in the topic chapters and detailed policies.

(5) *A resilient Plan – choices and contingencies*

We do recognise the limitations of projections based on experience of the recent past (paragraph 5.2), and in preparing the Plan a good deal of thought has been given to developments that could

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result in a break in recent trends, particularly as regards population and employment. The only way of dealing with what is by definition unknowable is the “plan, monitor, manage” approach – constantly testing our projections against actuality, monitoring change in London and making adjustment to policy where appropriate.

I agree with the points made in paragraph 5.3, and have tried to respond to them both in setting out the practical steps required to realise my vision and objectives (see Chapter 1 of the draft Plan), in setting targets over the period of the Plan (for example those in draft Policy 5.2 on minimising carbon dioxide emissions and in draft Policy 5.7 on renewable energy). There is also information about the likely phasing of major transport schemes in Chapter 6. Finally, you will see in Chapter 8 an indicative list of actions and projects to implement the new Plan which will, in time, form the basis of a detailed implementation report which will be published separately.

A great deal of research (para. 5.5) has gone into the policies in the draft Plan – it is based on entirely new population and employment projections, the results of a new Strategic Housing Land Availability Assessment, a new London Office Review, detailed work with boroughs to update the information in the Plan on town centres, opportunity areas and areas of intensification and updated work on carbon dioxide emissions and renewable energy. There is further work under way on waste arisings and their apportionment across boroughs. The research programme for the remaining stages of the review process will be refined after the draft Plan has been issued for consultation, and I will provide the Assembly with a full list of work that will be done once it is complete. I can confirm that the results of the research to date have been fully considered as part of the IIA process.

## *(6) London's Places*

The Committee's support for a polycentric London, and for my intention to give a stronger focus and support for outer London is very welcome (para. 6.4). You will see that the draft Plan does contain proposals for designation of strategic outer London development centres (draft Policy 2.16), but seeks to do this in ways that fit them with the network of other London centres (see draft Policy 2.7). The importance of town centres is reinforced in draft Policy 2.15.

You will see that the draft Plan does support growth and coordination corridors linking London with neighbouring regions (para. 6.5) to the north west (the London-Luton-Bedford corridor), the north east (the London-Stansted-Cambridge growth area), the east (the Thames Gateway), the south (Wandle Valley coordination corridor) and the west (the Western Wedge corridors), and you will see that the approach you recommend of having corridor-based growth centres has informed the approach taken to strategic outer London development centres. I agree that the concept of development centres has something to contribute to the development of outer London, and that there is no need to impose a single form these centres might take. I also agree that it is important to work closely with neighbouring regions on these issues, and officers are actively pursuing this approach.

The points made in paragraphs 6.6-6.9 are agreed, and you will see many of these points are addressed in the policies on outer London in Chapter 2 of the draft Plan (particularly draft policies 2.6 and 2.7). Similarly, the importance of linking decisions on development and transport investment (paragraphs 6.11-6.13) are addressed in draft Policy 2.8 and in Chapter 6 – with more detail in the Mayor's Transport Strategy.

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## *(7) London's People*

The housing policies in the draft Plan are informed by the results of the Strategic Housing Land Availability Assessment. This shows London has the capacity for 36,000 additional homes over the next ten years. You will see that the policies set out in Chapter 3 support the continued optimisation of London's housing potential (draft Policy 3.4) and maximising affordable housing in developments (draft Policy 3.13). I note the Committee's comments about ensuring delivery of agreed affordable housing targets (para. 7.3) – so far the approach of agreeing targets with boroughs have worked well, and any shortfall can be considered in the light of investment programmes through the Homes and Communities Agency as well as through the levers I have available through the planning system.

Your comments on the importance of high quality urban environments (para 7.5) are very welcome, and you will see that this is a major theme of the draft Plan, in the proposed policies on housing quality and in those in Chapter 7 dealing with architecture and the public realm (as well as in my draft Housing Design Guide, mentioned in paragraph 7.7, and which has been issued for consultation). You will see that the draft Plan incorporates space standards for new homes across all tenures. Equally, I recognise the points made in paras. 7.6 and 7.8 about density. I do not accept that moving from "maximising" density to "optimising" necessarily prevents us from meeting the need for new homes in London; it does however make clear that questions of density should be the start of planning for housing in London's neighbourhoods and not the end, and that a range of other issues including design, effect on local character and availability of social infrastructure also have to be taken into account. I strongly agree with what you say about the importance of social infrastructure, and you will see that this is dealt with in some detail in Chapter 3 of the draft Plan.

## *(8) London's Economy*

Again, I welcome the Committee's comments about the importance of a strong and diverse London economy (para 8.3). I also agree it is important to protect land available for sectors of the economy that play an important part in maintaining London's metabolism like waste, logistics and waste (para. 8.4), and you will see that the draft Plan contains stronger protection of strategic industrial land than hitherto (see draft Policy 4.4). One of the reasons for this is the anticipated growth in the "green" business sector (see draft Policy 4.10); many of these jobs are likely to be office-based, however, and as the draft Plan makes clear we have to ensure availability of a range of workspaces appropriate for the needs of all kinds of enterprises.

The draft Plan does refer to the importance of a successful and diverse retail sector (draft Policy 4.8 – which refers to the importance of local and neighbourhood centres and the need to prevent the loss of retail and related facilities) and small shops (draft Policy 4.9) (para 8.8). Availability of local shops is also an element of the "lifetime neighbourhoods" concept explained in Chapter 7.

The approach taken to planning for London's economy is to enable enterprises of all kinds to grow and prosper, and to provide a supportive policy framework for local initiative (para 8.9) and entrepreneurship.

## *(9) London's Response to Climate Change*

The points made by the Committee on climate change are important ones, and I greatly welcome your support for the objectives I have set. I particularly agree that the development sector has a key contribution to make to realising these (para. 9.8), and we have sought to produce a range of

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policies that are clear and explicit about the outcomes we will be looking for, while giving free rein to imagination and innovation in deciding how they will be met. The draft Plan does give more detailed information about how my emissions reduction targets will be met (para 9.6), but as you know development makes a relatively small contribution to emissions overall and you should look at the whole suite of my strategies, including those dealing specifically with climate change, for more detailed information. You will see that district-wide and networked approaches to decentralised energy (para. 9.10) are supported in the draft Plan, particularly draft policies 5.5 and 5.6).

The point made about smaller neighbourhood sites for waste management (para 9.9) has been considered, and the draft Plan does reflect the need for sites of all sizes. I do consider, however, that larger sites can enable greater efficiencies and economies of scale, and that given the focus in the draft Plan is the appropriate one.

I am committed to maximising the potential for freight transport on the Thames, and agree that it is important to protect those wharves which are viable (or capable of being made so) for freight uses (para 9.11). We also need to ensure the most is made of the potential of riverside areas for the other objectives in the Plan, and I believe that draft Policy 7.25 in the draft Plan sets an appropriate balance.

### *(10) London's Transport*

I have addressed most of the points made in this section in dealing with "London's Places". The draft Plan seeks to relate anticipated population and employment growth with transport investment to the extent it is possible to do so given the uncertainty about the funding that will be available after 2017.

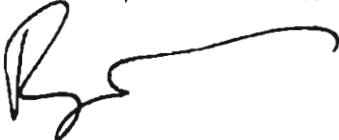
### *(11) London's Quality of Life*

You will notice that Chapter 7 of the draft Plan is called "London's living places and spaces". This change has been made to recognise that there are policies throughout the Plan that relate to quality of life (as shown in paragraph 1.52 of the draft Plan), and to more closely reflect the subjects dealt with in the chapter.

I am very heartened by the support of the Committee across the points listed in para 11.3. We have sought to take account of the Assembly's recommendations about agriculture (see draft Policy 7.21) and war memorials (see draft Policy 7.8).

There is the scope for further detailed discussion about the draft Plan and its policies through the public consultation stage and at the examination in public. I look forward to these; I am sure they will result in a London Plan fit to meet the challenges facing our great city.

Yours ever,



**Boris Johnson**  
Mayor of London

