

London Plan - Integrated Impact Assessment

Reasonable Alternative Options

This note from [REDACTED] GLA of August 22 has comments from Just Space of 28 August, in red.

General comment: this document takes the approach of working in some of the points made by Just Space in its 2 August submission, under each of the “Strategic Objectives”. This prevents there being a simple comparative evaluation of a community-led alternative approach to the LP as a whole which we regret. However it would, to some extent (discussed below) permit some evaluation of individual strands of the community-led proposals. The comments are made in that light.

Affordability of housing is probably the single issue which community groups place top of the list of priorities, both as a cross-cutting / London-wide issue and spatially in relation to estate clearances. We suggest that an additional point 7 under “Delivering the homes Londoners need” would be a transparent and strategic way of examining this issue.

Mixing affordability up with questions of social segregation / mixing cannot be satisfactory for a number of reasons:

1. The evidential basis for social mixing policies has been so robustly challenged by researchers from left and right as to be largely discredited;
2. Calls for ‘social mix’ in deprived boroughs/districts have long been used to reduce social housing targets or increase allocations of space for market housing, while ‘social mix’ is rarely or never proposed in privileged / rich areas. Since ‘mix’ has such different meanings in different parts of London it can’t be a meaningful axis for analysis.
3. Housing estates in London have long had more diverse tenants than nationally, and 30 years of Right to Buy, re-sales and private letting have greatly weakened the correlation of ‘tenure’ with social class.

Our comments on “Strong and Inclusive Communities” are made in the light of these points.

Best Use of Land - Spatial Options

1. Current London Plan

- Focusing high order economic growth in the CAZ/Isle of Dogs (and inner London)
- Opportunity and Intensification areas – largely residential led
- Housing Zones – 31 currently identified
- Town centres as the main focus of commercial activity beyond CAZ
- Renewal of medium order town centres (some Majors and more Districts) – higher density, housing led mixed use re-development
- Selective release of industrial land for housing based on updated industrial land benchmark release. For consistency (i.e. this Option is meant to be

carrying on as before) the “updated” land release should not represent a change of practice from recent years. If there were a substantial reduction of release, this option would blur into others where release is reduced.

2. Sustainable Intensification

- Focusing high order economic growth in the CAZ/Isle of Dogs but also encouraging more dispersed growth across London;
- all of option 1 with an uplift in housing density generally and in particular in locations well served by public transport,
- medium and higher order town centres – more targeted approach to identifying and facilitating re-development/intensification opportunities in some Major and, in particular, District centres through mixed use residential led higher density renewal;
- more proactive approach to managing industrial land release including facilitating co-location of suitable industrial and housing, and selective re-location of industry within and beyond London, **Comment (i) “more proactive” must mean releasing more: better to be frank; (ii) the relocation outside London blurs with Option 5 and that makes the comparison less useful. Our concern is that the more industrial land we loose, scarcity and rents will increase, driving some out of business and others to relocate as best they can. Consequences for workers, passenger movement & freight + damage to industrial interdependencies.**
- suburban intensification - selective redevelopment of some parts of outer London for housing that are in medium to high PTALS
- growth corridors – scope for denser development based on significant infrastructure delivery such as Crossrail 2, Bakerloo line Extension, possible expansion of Heathrow,

3. Polycentric approach

- Greater focus on more dispersed patterns of economic growth with an emphasis on protecting and promoting local economies including street markets, **high streets** and local centres and supports the provision of new workspace
- protection of industrial areas with no further loss of industrial capacity
- investment in orbital movements with investment directed towards smaller scale infrastructure rather than commuter routes
- **Strong support for Lifetime Neighbourhoods / Suburbs in which basic public, commercial and community services are accessible on foot/bike in denser areas or with short bus trips in low density suburbs.**

4. Green Belt Release

- All of option 1
- selective Green Belt release for housing, especially in Development Corridors – led by the boroughs as part of their Local Plan review

5. City Region Approach

- Main focus of economic growth within CAZ/Isle of Dogs and encouraging more dispersed economic growth across London coupled with stronger emphasis on fostering economic success with partners for growth on city region scale – this would include proactively working with partners in the Wider South East to develop infrastructure corridors and selectively encourage industrial relocation outside of London
- all of option 2 – housing growth
- increased focus on Duty to Co-operate beyond London – targeting investment in strategic infrastructure there to enable partners to share housing **and employment** delivery across the wider region
- **Cooperation with other regions and countries of the UK on re-balancing national development which could, among other benefits, reduce the growth pressures within GL. (This did not come up in recent discussions with GLA but has been in all JS documents and commands wide support.)**

Strong and Inclusive Communities

1. mixed and balanced communities

- strategic target of 50% affordable housing to ensure ~~a mix of tenure across London~~ **all parts of London contribute to meeting housing needs.**
- policies to ensure a mix of dwellings types and sizes **at all rent levels**
- policies that provide an accessible and safe environment
- policies that promote a range of employment opportunities and training
- designing places that enable increased interaction and participation
- **supporting existing communities in situ through reduced estate clearances**

2. more homogenous communities

- ~~much greater provision of affordable housing e.g. 75% could result in a concentration of deprivation (although with inclusion of intermediate housing, less likely)~~ **(Comment: (i) 75% seems unrealistic, given failure in past to reach 50%, even with massaged definition of “affordable”; (ii) Would only increase homogeneity if done in areas which already have lots of affordable housing; if done in Bromley it would have the reverse effect.)**
- rely on market forces for cost, type (tenure, no. bedrooms) of dwellings – could result in predominantly two bedroom market flats being provided, a move to shared living schemes, more student housing

- ### 3. improving infrastructure in targeted locations – policies to support the provision of additional social and physical infrastructure in deprived areas **(Comment: of uncertain effect because social infrastructure could help, while improved transport can accelerate displacement and thus segregation.)**

Healthy City

1. Prevention – healthy streets, building design, enabling healthy choices, active travel, improving air quality, access to green and open spaces, healthy food environment
2. Cure – provision of health facilities and care to address health issues
3. Targeted approach to tackle health inequality (i.e. location and health issues specific) or London wide approach
4. Priority in housing to improvement of conditions in the most unhealthy dwellings

Delivering the homes Londoners need

1. Focus on Temporary housing
2. Focus on family housing
3. Focus on one or studios
4. Leave delivery to the market forces – so probably 2 bed flats, student housing, shared living schemes
5. Greater focus on addressing need i.e. type and size of dwellings
6. Greater emphasis on delivery of affordable homes
7. Concentrating on Social/Target rents at the expense of total numbers.

An Inclusive Economy

1. Investment in infrastructure to support economic growth in the CAZ, town centres
2. More dispersed economic growth across London in local centres and other places, including the protection of existing workspaces
3. Leave to market forces to determine type and nature of employment space that is retained/provided

Efficiency and Resilience

1. Significant focus on carbon reduction
2. Significant focus on reliance on resilience – (design of building, reducing overheating, winter cold & fuel poverty)
3. Safe designed city; flood risks??
4. Not to significantly cut carbon dioxide emissions i.e. Not to go beyond Government carbon dioxide targets
5. Not to design for resilience or just certain elements of resilience