

# Draft Further Alterations to the London Plan

---

**EXAMINATION IN PUBLIC**  
**18 June – 10 July 2007**



## Panel Report

September 2007

DRAFT FURTHER ALTERATIONS  
TO THE LONDON PLAN

---

Draft Further Alterations to the London Plan  
**Examination in Public 2007**

---

Mr Ken Livingstone  
Mayor of London  
City Hall  
The Queen's Walk  
London SE1 2AA

Panel Secretary  
Draft Further Alterations to the London Plan EIP  
c/o City Hall  
The Queen's Walk  
London SE1 2AA

28 September, 2007

Dear Mr Livingstone

**Further Alterations to the London Plan**

We have pleasure in submitting to you our Panel Report following the Examination in Public into the Further Alterations to the London Plan, which was held, as you know, in June/July of this year.

We had a full and detailed discussion of the matters which we selected for debate. They were important issues, with wide ranging implications for the future of London. We have done our best to reflect the views of all the parties on these matters, but as always it is inevitable that there will be those who are disappointed that their views have not prevailed. However, as an independent Panel, we have sought to provide an objective and professional opinion to the best of our ability. A feature of our recommendations for changes to the Plan is that many of them were agreed before or during the course of the EiP, through briefing notes from your representatives or other parties. We think this is a positive feature of the process we have gone through.

We hope that our work will assist you in finalising this important Plan.

Yours sincerely

*Chris Shepley*

Chris Shepley  
CBE BA DipTP MRTPI

Panel Chair

*Alan Langton*

Alan Langton  
DipTP CEng MRTPI  
MICE MIHT

Panel Inspector

*Stuart Nixon*

Stuart Nixon  
BSc (Hons) DipTE CEng  
MRTPI MICE MIHT

Panel Inspector  
(Matter 8 only)

Cc Rt Hon Hazel Blears MP, Secretary of State for Communities and Local Government

DRAFT FURTHER ALTERATIONS  
TO THE LONDON PLAN

---

## Table of contents

	Preface	iii-v
	Overview	1
Chapter 1	Climate Change	8
Chapter 2	Blue Ribbon Network	52
Chapter 3	Inter-regional issues	68
Chapter 4	Sub Regional Structure	81
Chapter 5	Designated Localities	98
Chapter 6	Housing	143
Chapter 7	Transport	161
Chapter 8	Waste	176

## Appendices

Appendix A	Examination in Public: Schedule	A1-16
Appendix B	Minor corrections, clarifications and updates	B1-7
Appendix C	Core Document Library	C1-17
Appendix D	List of Briefing Notes	D1-3
Appendix E	Abbreviations used in the Report	E1-4
Appendix F	Plan Reviews	F1-5



## Preface

The Mayor has a duty to review the Spatial Development Strategy for London from time to time as set out in Government Office for London Circular 1/2000<sup>1</sup>. In his ‘Statement of Intent’<sup>2</sup> the Mayor set out his reasons for undertaking a partial review of the 2004 London Plan, hereafter ‘the Plan’. The Draft Further Alterations to the London Plan (Spatial Development Strategy for Greater London), published in September 2006, extend the timescale of the Plan from 2016 to 2025/6, contain a group of new Climate Change policies, proposed new sub regional boundaries and a host of other changes scattered throughout the Plan. The Draft Further Alterations to the London Plan are referred to as ‘the FALP’ throughout this Report.

The FALP were submitted for public consultation between 28 September and 22 December 2006. The FALP consultation attracted 339 separate responses and 3,410 individual representations. In addition, between 6 December 2006 and 2 March 2007 a separate consultation took place on a Draft Minor Alteration on Borough level Waste Apportionment. The Waste Apportionment consultation generated 23 responses.

We were appointed by the Secretary of State to conduct an Examination in Public (EiP) into selected issues arising out of the FALP. In consultation with the Mayor<sup>3</sup> and Government Office for London (GOL) and based on the representations received during the consultation period a total of eight matters and six sub matters were selected for Examination by the Panel. The Participants to be invited to appear at the EiP were also selected in consultation with the Mayor and GOL. Additional Participants were included following the consultation period. In total 87 individuals or organisations were invited to attend and all but a few accepted.

The EiP Timetable, Matters and Participants are reproduced in Appendix A of this Report. All Participants were given the opportunity to submit written statements prior to the commencement of the EiP. These were published on the EiP website<sup>4</sup>, as were the lists of more detailed supplementary questions for each session. The latter were also circulated to the Participants of the relevant session a week in advance. Written statements submitted by those invited but unable to attend and by others not invited to participate have also been taken into account.

---

<sup>1</sup> “Once the SDS is in place it may not always be necessary to review the whole strategy at once. It may be more appropriate for a review to concentrate on a limited number of subject areas or themes, possibly as part of a linked programme of reviews”. Strategic Planning in London. GOL Circular 1/2000, paragraph 4.28. (CDL-CG013)

<sup>2</sup> Reviewing the London Plan. Statement of Intent from the Mayor, Mayor of London, 2005. (CDL-LW003)

<sup>3</sup> Unless stated otherwise, throughout this Report the term ‘the Mayor’ also embraces the Mayor’s representatives at the EiP.

<sup>4</sup> [www.london.gov.uk/london-plan-eip](http://www.london.gov.uk/london-plan-eip)

A Library was available both before and during the EiP. This contained the representations and written statements received as well as core documents, most of which had electronic web links. The Library documents are listed in Appendix C and the Briefing Notes (BNs) in Appendix D. A list of abbreviations is given in Appendix E.

The EiP website was the main source of information about the Examination and was regularly updated to provide access to documents and information about progress being made. This contained information about the Panel members, a database summarising the representations, minutes of the preliminary meeting and the two seminars, copies of the written statements, the schedule of matters and Participants, the EiP timetable and BNs submitted both before and during the EiP. The Core Document Library with electronic links to most of the documents was also listed on the website.

The Preliminary Meeting was held at City Hall, London, on 19 March 2007. The purpose of the meeting was for the Panel to explain the nature of the Examination process and to answer questions from those present. Two seminars, one on Climate Change and one on demographic and economic projections, were held on 10 May, also at City Hall. The EiP was held over a period of just under three and a half weeks from 18 June until 10 July 2007. The Panel undertook a tour ranging across London prior to the EiP.

Our report concentrates on presenting our conclusions and recommendations for changes we consider that the Mayor should make. In doing so we have not sought to lay out the whole evidence nor all the arguments presented to us, which led to each of our conclusions. Instead we have adduced only as much reasoning as is necessary to explain the basis of the view we have reached.

All of the EiP sessions were recorded onto CDs, copies of which can be obtained from the Publications Department at the GLA.

The Mayor's Vision and six main Objectives were taken as starting points against which to examine the FALP, having regard to the general duties and powers of the Mayor as set out in Statutory Instrument 2000 No. 1491 and amplified in GOL Circular 1/2000, and the requirements in the GLA Act with respect to the Plan<sup>5</sup>: that it deals only with matters that are of strategic importance to London and takes account of the health of Londoners, equality of opportunity and contributes to sustainable development in the UK.

---

<sup>5</sup>Statutory Instrument No. 1491, The Town and Country Planning (London Spatial Development Strategy) Regulations 2000. CDL-CG025; GLA Act 1999, Section 41, 1999. CDL-CG038.



## **Acknowledgments**

### *To the Participants*

We are grateful to all the organisations and individuals who participated in the EiP, in particular the Mayor's team who willingly provided additional information as required and who were unfailingly good-humoured throughout.

### *To GLA staff*

We acknowledge all the work carried out by GLA support staff which contributed to the smooth and efficient running of the EiP, and thank members of the Policy and Partnerships Directorate, the Technology Group, porters, the catering team, security staff and in particular members of the web team, who worked very hard to ensure that documents appeared on the EiP website as quickly as possible.

### *To the Panel team*

We thank those who have assisted us throughout the EiP process for their help and support: Alan Nettey and Mike Hale, Planning Officers and Najam Khan, Trainee Planning Officer, all from the Planning Inspectorate; Gillian Wilson, Panel Secretary and Karen Richardson, EiP Panel Assistant. All made an invaluable contribution to the work of the Panel in each of their roles.

DRAFT FURTHER ALTERATIONS  
TO THE LONDON PLAN

---

## Overview

### Introduction

0.1 The Further Alterations to the London Plan (FALP) contain several different kinds of Alteration. Those in grey text were not before us; they were the changes that had followed from the Early Alterations (EALP)<sup>1</sup> and that had recently been the subject of a separate statutory Alteration process. Those in heavy type and highlighted were seen by the Mayor as being “significant change”; those in heavy type but not highlighted were seen as being “minor change and update”. All sections, except Chapter 5 (the Sub Regions) and some of the annexes, were set out in two columns so that it was usually possible to compare the Alterations with the published London Plan.

0.2 The FALP had been based on a “Statement of Intent”<sup>2</sup>. It was the group of new policies associated with Climate Change which constituted the most significant Alterations. These were not numbered sequentially, some of them having been re-ordered or moved into that section from other parts of the Plan, and they were initially hard for the Panel and Participants to follow. The second significant area of change was Chapter 5, which had been re-written to conform with the proposed new sub regional boundaries. The Mayor argued that most of the policies in that Chapter were not new – they were “substantially the existing policies applied to the new sub regional geography”.<sup>3</sup>

0.3 We deal with both of these substantial areas of change later in this report. But in addition to these a very large number of other changes were scattered throughout the Plan. The Mayor explained that these were in some cases updates (eg to reflect the Olympics and Paralympics); others reflected Government policy changes or were responses to clarify and re-define policy. Some of these were highlighted as being significant, others not. No part of the Plan was without some change, but many parts were the subject of only minor alteration.

0.4 All this gave the Panel problems as we approached the EiP. It was clear to us that we were not expected to consider the Plan as a whole – only the Alterations. Indeed it would have been quite wrong of us to consider parts of the Plan which were not significantly changed. To have made recommendations in those areas, where there had been no public debate about possible change and no Sustainability Appraisal, would clearly have been beyond our remit. So we

---

<sup>1</sup> Draft Alterations to the London Plan (Spatial Development Strategy for Greater London), Mayor of London, October 2005. CDL-LW019

<sup>2</sup> Reviewing the London Plan. Statement of Intent from the Mayor, Mayor of London, 2005. CDL-LW003

<sup>3</sup> Draft Further Alterations to the London Plan (Spatial Development Strategy for Greater London), Mayor of London, September 2006, un-numbered page ‘Focus on the Further Alterations’. CDL-LW001

approached the task on the basis that we were to consider the FALP by looking at the areas which were in heavy type and highlighted as being significant – but with an open mind as to whether we should consider some of the un-highlighted “minor changes and updates” (and in the end we did so). We found that the range of topics which we were to consider was somewhat disjointed. We selected (having considered all of the representations) a list of matters which, in addition to Climate Change and the sub regions, contained certain aspects of, for example, housing, transport and employment policies – but not others, which were unaltered. In the case of housing, to take an example, much of the Plan had been considered during the Early Alterations – the housing numbers for each Borough had been settled, for example; and that had happened only a few months earlier. But there were changes to specific aspects of housing (such as density and affordability) that attracted much comment and which we thought we needed to discuss at the EiP.

0.5 In response to our draft list of matters we decided to include some additional topics where the Mayor felt that the Alterations were not significant but where there was a substantial number of representations.

0.6 We also dealt with a matter which was “left over” from the previous EiP into the Early Alterations, and which was the subject of separate consultation – the question of the apportionment of waste.

0.7 Many of the changes which will ensue as a result of the process will come not so much from this report as from statements and Briefing Notes (BNs)<sup>4</sup> which were prepared by the Mayor or others before or during the EiP. We refer to these in our report but we think it was a strength of this particular Examination process that so much was raised at earlier stages and settled, often (though not always) with widespread agreement, in that way. At the minimum it allowed parties to see and comment upon the precise amendments which were envisaged; and it also generally assisted the Panel in making recommendations.

*“Minor corrections, clarifications and updates”*

0.8 As may be expected the responses to the FALP largely determined our choice of matters to be examined in public and the range of Participants invited. The outcomes comprise the main body of this report.

0.9 It was evident that the responses also included disparate issues of corrections, clarifications or updates that did not appear to go to the substance of the FALP, and many of which we suspected the Mayor would willingly adopt. We felt then, and more so now, that this arose at least in part because as we have said the FALP cover a wide range of topics, some substantially and others in small detail.

---

<sup>4</sup> See Appendix D

0.10 We did not wish to take up what potentially could have been lengthy public Examination time, much of it likely to be unproductive with obvious problems in trying to align Participants to discuss lists of individually small items. Instead, with the support of the Mayor we opted for a written process, in the public domain with opportunities for Participants to contribute.

0.11 In brief<sup>5</sup>, the Mayor prepared an initial list of items (a draft of BN5 (11 April 2007)) which following comments by the Panel (BN12 (27 April 2007)) was revised and issued at the Panel's request in two stages. Blue Ribbon Network items (BN11 (2 May 2007)) took priority so that Participants could see them before preparing their own statements. The closing date for statements was 18 May 2007. A composite list of all items (BN5 in its final form, together with BN8 commenting on BN12) took a little longer (16 May 2007), but still allowed ample time for Participants to respond, albeit not in their written statements. Finally, following the Examination process, the GLA helpfully submitted a further document collating the above minor corrections, clarifications and updates (BN72).

0.12 The envisaged process was outlined orally at our public Preliminary Meeting (19 March 2007), and was flagged up on the Draft and Final Lists of Matters and Participants which were sent to all initial respondents, and again on the lists of Supplementary Questions issued to Participants for each Examination session. These documents and the BNs were all included on the website.

0.13 We know that the Mayor's team was pleased by this way of handling the lesser matters and a number of Participants took the opportunity to comment on individual items. So far as we are aware, there has been no objection or even disquiet raised regarding the process. We list our recommendations on the individual items in Appendix B, in the main accepting the Mayor's suggestions.

0.14 In the rest of this overview we deal with two issues. The first is the question of the "soundness" of the FALP (and we briefly deal with the question of future reviews). The second deals with some thoughts we had about the process, arising from the issues we have described above, which we intend primarily for the benefit of future RSS/London Plan reviews rather than as a conclusion on the FALP themselves.

### *Soundness*

0.15 In general terms we consider that the FALP were prepared on the basis of good evidence, that the work which had been done in preparing them was thorough, and that the arguments put forward on behalf of the Mayor were convincing and professional. This is not to say that they always prevailed, of course, and we heard some well argued objections and representations. We deal

---

<sup>5</sup> At this early stage the Panel secretariat had not been fully set up and some Briefing Notes were later indexed out of date order.

with them in this report. But in general we think the Mayor's team is to be commended on the quality of its work.

0.16 Whilst PPS11<sup>6</sup> does not apply directly to the London Plan, GOL Circular 1/2000<sup>7</sup> encourages some application of what is now PPS11, and it does provide a useful basis on which to consider the overall "soundness" of the Plan, using the tests set out in paragraph 2.49 of the PPS. Because we are dealing with a set of Alterations rather than a complete Plan some of the tests have in effect been considered at earlier EiPs and are difficult to apply.

0.17 The first test for example – whether it is a spatial plan taking into account related policy initiatives and programmes relevant to meeting regional economic and social needs, etc - effectively applies to the Plan as a whole rather than the FALP. We believe there is nothing in the FALP which reduces compliance with this test, nor with the second one – which is whether it meets the objectives for an RSS set out in paragraph 1.7 of PPS11.

0.18 The third test is whether the Plan is consistent with National planning policy. We deal with this at various points in this report. Our conclusion is that, other than in respect of Heathrow Airport (see our Chapter 7), in general the FALP do comply with policy; where they arguably go beyond current policy (for example in some aspects of Climate Change) we believe the case for doing so is well made.

0.19 We consider (test iv) that the Plan as altered is very much in line with other strategies for London and indeed provides a common spatial framework for a suite of documents which the Mayor has prepared or is preparing for aspects of London's development. We are impressed by the way the London Plan forms the over-arching framework for those other documents. We have some reservations however about the question of consistency with surrounding regional strategies, which is also part of test (iv), and we deal with this in Chapter 3. In many cases, any inconsistencies are not entirely of the Mayor's making, or within his or our powers to put right – we discuss later the need for better inter-regional co-ordination.

0.20 Test (v) is whether the policies within the Plan are consistent with one another. Insofar as we are able to determine this issue (and it is difficult because we only considered parts of the Plan) our view is that the test will be met if our recommendations are accepted. Some parties at the EiP argued differently – suggesting for example that the Alterations to Climate Change policies ought to have led to the consideration of changes elsewhere. We make some comments on this in Chapter 1.

---

<sup>6</sup> Planning Policy Statement 11: Regional Spatial Strategies, ODPM, 2004. CDL-CG039

<sup>7</sup> Strategic Planning in London. GOL Circular 1/2000, GOL, 2000. CDL-CG013

0.21 Test (vi) is whether the Plan is founded on a robust and credible evidence base. We consider that this is very clearly so; we had a very detailed and thorough set of data before us throughout the EiP.

0.22 On test (vii) - the need for community and partnership working etc – we did hear some concerns from Participants in the debate on the Blue Ribbon Network (see Chapter 2 below) and with regard to some Opportunity Areas (see Chapter 5 below) about their opportunity to participate in the preparation of the FALP. But nonetheless we are aware that substantial consultation did take place and have no evidence to suggest that this was not carried out thoroughly. Similarly on test (viii) – whether it is realistic, etc – we are content. On test (ix) – whether it is robust and able to deal with changing circumstances – we note that the Plan, which was originally published in 2004, has already been the subject of two sets of Alterations. Clearly the Mayor is able to deal with changing circumstances in this way.

0.23 Test (x) concerns the Sustainability Appraisal (SA). This was issued in September 2006 and updated and re-issued in April 2007. The SA also dealt, in Appendix C, with the question of Appropriate Assessment under the EU Habitats Directive. All this had been carried out in a thorough manner and it attracted no significant comment in evidence or during the EiP.

0.24 Test (xi) concerns whether the Plan has been prepared in accordance with all proper procedures; so far as we are able to judge this test has been met, as has test (xii) – we consider that there are clear mechanisms in being or in train for monitoring and implementation.

0.25 We therefore conclude that, if our recommendations are accepted, the tests are generally met.

#### *Review*

0.26 The Mayor indicated his intention to produce a further set of Alterations soon (he was not specific about the date). This was, in particular, to deal with the need to roll forward the housing figures, which he is committed to completing by 2011 (and we discuss this in Chapter 6). But it was clear that there were aspects of the Climate Change policies which would need to be altered (we mention a number of them in Chapter 1). There are no doubt other issues where change will be necessary.

0.27 We welcome this, and are confident given the Mayor's track record of making two sets of Alterations since 2004 that such a process will be forthcoming.

0.28 This issue did however lead to some debate at the EiP, with several parties arguing that a complete review of the Plan as a whole would be necessary. We agree that as more sets of Alterations are produced the coherence of the Plan as a whole will be threatened. We think that a single focussed set of Alterations in

about 2009, dealing with the housing figures and a limited number of other matters, would be acceptable. But we do not think it possible for the Mayor to produce more than one such set of partial Alterations before it will be essential for him to produce a complete review of the Plan, giving an opportunity for the underlying principles to be debated. There are arguments for proceeding to this stage straight away, and we urge the Mayor to consider it, but it can be argued that the need to roll forward the housing figures from 2016, without the delay that a complete review might entail, would make that problematic.

### *The Process*

0.29 In making the following comments we intend no criticism of the Mayor in the way he went about the Alterations; nor do we have any regrets or doubts about the approach we took, the ground we covered, or the conclusions we have reached. But the background we have described made for an EiP which was difficult in two respects. We raised these openly during the EiP, and had a short debate on the subject – primarily to enable lessons to be learnt for future Alterations and Reviews (not just in London but in other Regions where the first round of Plans has now largely been completed but where Reviews and Alterations are now likely). We set out our questions, and the Mayor responded, in writing – and this exchange is included as Appendix F.

0.30 The two concerns we had were these. First the very large number of major and minor Alterations throughout the Plan gave us problems in drawing up a list of matters which was satisfactory to all the parties, to us, and to the Mayor. The Mayor indicated that the cost of the EiP process was such that he wished to deal with as many matters as possible to get value for money. We have described the thought process that we went through. Not only was this a problem in terms of fairness to all the parties, and the need to keep the EiP on track in terms of both time and subject matter; but it also made for a somewhat ‘bitty’ EiP where we were spending relatively short amounts of time on each topic.

0.31 The second, and related, problem was that Participants (and sometimes the Panel) found it hard to confine themselves to this limited range of topics and wanted to range more widely over the Plan as a whole. Sometimes there was an understandable reason for doing this – for example it was argued that an Alteration which had been proposed would have knock-on effects elsewhere in the Plan. On other occasions it was less justifiable, with Participants wanting to ride particular hobby horses which were clearly not in the race.

0.32 In some areas both we and the Participants found our inability to get at the unaltered fundamentals of the Plan a little frustrating and some quite profound points were made by Participants which we are unable to report upon because they go to issues which we were unable to consider. As an example we heard some very interesting and thoughtful views about the extent to which regeneration, in the Thames Gateway or the Elephant and Castle areas for example, was or was not leading to benefits for local people. It was probably the community groups who



had the greatest (understandable) problems in seeing why the scope of the EiP was limited, and who may be frustrated that some of their points are not fully covered in this report.

0.33 In the short debate we had at the EiP on these issues, Government Office for London (GOL) made several useful comments. GOL welcomed the Mayor's suggestion (see Appendix F) that DCLG, the English Regions Network and the Planning Inspectorate should look at this issue, not in order to look back at this EiP but in order to think about the approach to future EiPs throughout England based on experience in London. GOL felt – as did the Mayor and indeed the Panel – that setting out the scope of the changes at the outset had been valuable and felt that community groups in particular needed to be involved in and able to understand this process. They felt that the use of written representations to deal with minor alterations could be enhanced by being more clearly codified, and suggested the use of mediation.

0.34 We agree with these points. We feel that Regional Assemblies or the Mayor need to be crystal clear about the scope of Alterations, and disciplined in the way they approach the topic – avoiding the temptation to throw in changes which do not need to be made and limiting the Alterations so far as possible to those which are essential. They need to try to make the group of Alterations which they propose as coherent as possible, but to take into account any implications which the proposed changes may have for the rest of the Plan.

0.35 We make no recommendations about any of these points but there was a general view at the EiP that the debate had been useful. We hope that it will lead to improvements in the way Alterations are considered in the future. We repeat that we intend no criticism of the Mayor in any of this – our aim simply is to learn from experience. And we also repeat that we are entirely content with the list of matters we eventually chose and with the way the EiP considered them.

## Chapter 1 Climate Change

### Introduction

1.1 The policies on Climate Change in Chapter 4A of the FALP represent the most significant area of change to the London Plan – both in terms of the number of Alterations and the importance of the issues which are raised. We spent most of the first week of the EiP discussing these issues.

1.2 In our Overview, we touched on difficulties we and others initially found with the way the FALP had been formatted. This was especially so with Climate Change, where the policies, in the form in which they appeared in the FALP, were not easy to examine. We expect that in the published version of the Plan, incorporating the Alterations, the presentation of the policies will become much clearer; but the way in which they were ordered and numbered, and the number of Alterations which were proposed, made for a difficult task both for the Panel and the Participants. This was compounded by three other factors. The first was that a very large number of modifications were proposed in various Briefing Notes (BNs), mostly by the Mayor but also by GOL and others – in particular BN numbers 5, 8, 10, 16 (various elements), 17, and 34-36. Though many of these changes were helpful – and indeed were often in response to requests from the Panel - they have added to the complexity of the process. (We have not dealt with all of the minor changes in this Chapter – see Appendix B for a complete list).

1.3 The second was that many of the parties, perhaps understandably, found it hard to confine their arguments to the Climate Change policies themselves and wished to discuss other parts of the Plan which are not the subject of Alteration and therefore not within the Panel's remit. For example, some parties wished to raise elements of the housing, employment or transport policies which they considered were relevant to Climate Change. We have already discussed this problem in general terms in the Overview.

1.4 The third was that some parties went into a great deal of detail about, for example, various technologies, some of which was not entirely relevant at the strategic level.

1.5 Despite this we were able to discuss the policies in some depth and benefit from much expertise – but with very contrasting views about the Mayor's proposals. We ought to record that all of the Participants supported the general aims of the Plan and were agreed that measures to deal with the threat of Climate Change were necessary. The differences – sometimes serious ones – were of degree; of the speed with which the Mayor intended to make progress, and the feasibility and practicability of his proposals. Some thought he was not going far or fast enough; others that his plans were too ambitious, were unachievable, or

---

might damage London in some way. We deal with these arguments in this Chapter, but first we set out some general conclusions.

## Overview of Climate Change

1.6 The Mayor's proposals were supported amongst other documents by a technical evidence base produced by Arup in April 2007.<sup>1</sup> We referred to this document frequently in the course of our consideration of the Alterations.

1.7 Climate Change features strongly in the Mayor's Objectives for the FALP, set out in the Preamble and Introduction, especially in Objective 6. The Mayor's proposed policies are forward looking – perhaps radical. The Mayor argues that London, as a high density, high growth City, has advantages in terms of the implementation of mitigation measures. He goes beyond the policies which appear in other Regional Spatial Strategies (RSSs) in a number of respects and some argue that he goes beyond the Government's present policies (we discuss this later). At various points the Mayor indicated that he was seeking to take a lead, nationally and indeed internationally. It was the intention of the FALP to change behaviour. The Mayor in his introductory statement to the EiP said that "To deliver my vision for London we must lead the way in showing how one of the World's greatest Cities is planning for and adapting to already inevitable warming, and even more importantly achieve very substantial reductions in our emissions of carbon dioxide". He went on "...the policies on Climate Change need to be bold. It is clear that a radical change in our approach to development is necessary if we are to avert the tipping point which would lead irreversibly to catastrophic Climate Change" (BN29). The Deputy Mayor made similar points in her introduction (BN30).

1.8 In general terms the Panel accept and support the approach of the Mayor. We believe that the case for bold policies was made convincingly in the FALP themselves, in the written evidence from the Mayor and his consultants, and at the EiP. Indeed we would go further and applaud the Mayor's commitment and leadership in this area. Though we take very seriously the representations and objections made at the EiP – both by those who thought the policies were too radical and those who thought they were not radical enough - we were convinced that the approach in the FALP was in general reasonable and proportionate. We note that the Mayor has statutory duties in respect of Climate Change (in GOL Circular 1/2000) and that he was elected on the basis that he would take action in this regard. GOL indicated that they "welcome the leadership" shown by the Mayor. We feel that there is no basis for us seriously to challenge his approach and what follows – though critical in places – is based on this presumption.

1.9 Within this important context we make five other general points.

---

<sup>1</sup> Evidence Base: Climate Change in the Further Alterations to the London Plan, Arup for Mayor of London, April 2007. CDL-LW061

*FALP and other documents*

1.10 We have mentioned that we had problems arising from the degree of detail which some parties wished to discuss – and which in many cases they wished to see incorporated in the Plan. We think it is important to remind parties at the outset that the London Plan itself – though it is the over-riding document – is not the sole source of policy and guidance on Climate Change. There is already Supplementary Planning Guidance (SPG) – on Sustainable Design and Construction for example<sup>2</sup> - and SPG will grow and develop. There will rightly be further policies in Development Plan Documents (DPDs) and other policy statements produced by the Boroughs. Though it is not an easy line to draw we take the approach – as did the Mayor – that the London Plan itself sets the strategic framework and parameters; it needs to give clear guidance but it should not attempt to cover all possible angles.

*Changing technology*

1.11 This is particularly the case since we are clearly in a field where ideas and technology are changing quite rapidly. We questioned the Mayor and his representatives on this point. They accepted that the Plan would need review as new developments emerged.

*Flexibility*

1.12 But the Mayor argued that the Plan contained sufficient flexibility to deal with changing technology. This was a key issue in the debate. Several parties argued that the Plan was not sufficiently flexible and that – within an overall set of targets - greater freedom should be given to developers to decide how to use technology to achieve these goals. The Mayor's view was that the opening section of Chapter 4A – especially the overarching Policy 4A.15 (which is proposed to be modified in BN10) and succeeding paragraphs – provide the flexibility which is needed. Certainly later policies in the FALP need to be considered in the context of this basic policy statement and not all Participants found it easy to read across in this way. Again we return to this later; we think it is important that there is flexibility within the Plan, and we think this is the Mayor's intention, but we are not sure that it is always clear enough as it stands.

*Stretching targets*

1.13 There was a general view that some of the targets and policies in the FALP were stretching and would be difficult to achieve. The Mayor adduced evidence, often from experience abroad, to suggest that they were in fact achievable, but he accepted that behaviour would need to change significantly if this was to happen in London. Indeed as we have indicated the Mayor saw this as one of the purposes of the Plan. We accept in general the need for stretching

---

<sup>2</sup> Sustainable design and construction, Supplementary Planning Guidance, Mayor of London, May 2006. CDL-LW028

---

targets as a means of encouraging new ways of thinking and promoting change, though we consider each topic, and the reservations which a number of parties had, in the succeeding sections of this report.

*Consistency of the Plan as a whole*

1.14 We discussed earlier the types of problem which arose in the EiP, including the wish of parties to consider other aspects of the London Plan. It was argued that some of the existing policies may not be consistent with the proposed new ones on Climate Change. Some parties thought there was too much emphasis on economic growth in the London Plan. Some used the opportunity of the revision to the Climate Change policies to raise fundamental issues about the basic approach of the Plan, and the distribution of activity across London.

1.15 Though some of these issues come up in Chapter 5 in response to other aspects of the FALP, it would be wrong for the Panel to recommend Alterations to those policies which have not been the subject of alteration or to recommend fundamental changes to the balance of the Plan; there has been no consultation on possible changes to these issues, we have no serious evidence base on which to work, and few concrete suggestions as to Alterations which might be needed.

1.16 Against this background of general support we turn now to the main issues which were discussed during the EiP. The debate fell into two, related, parts. Firstly we considered mitigation – including conformity with Government policy, the targets for CO<sub>2</sub> reduction and on-site renewable energy generation, the technologies promoted in the FALP, and an issue regarding the Objectives of the Plan in relation to reducing the need to travel. We then went on to discuss adaptation – including flood protection, water supply and air quality.

**Mitigation – general approach**

1.17 We asked in general terms whether the FALP policies offered a robust way forward in terms of policies dealing with mitigation. The following issues arose during that debate.

*Conformity with Government Policy*

1.18 After the FALP were published, the Government produced a “Green Package” of documents dealing with this issue. A draft supplement to PPS1 (Planning and Climate Change), the Code for Sustainable Homes (CSH) and “Building a Greener Future” were issued in December 2006.<sup>3</sup> Some parties at the EiP had somewhat unreasonable expectations as to the extent to which the FALP could have conformed with documents that had not then been issued. Nonetheless,

---

<sup>3</sup> (Consultation) Planning Policy Statement: Planning and Climate Change – Supplement to Planning Policy Statement 1, DCLG, December 2006. CDL-CG006; Code for Sustainable Homes, DCLG, December 2006. CDL-CG005; Building a Greener Future, DCLG, December 2006. CDL-CG007

---

the Panel asked questions about conformity, both in general and in detail, with these important Government statements.

1.19 The general question of conformity was dealt with in the Arup report mentioned earlier. Section 5.3 of that document, which was also reproduced in part in BN6, demonstrated that the approach was similar; the Mayor saw the FALP and the Green Package (in particular the draft PPS), as “mutually supportive” in policy terms. This was not seriously disputed. GOL for example said in its statement that “We consider that the further Alterations in general terms echo the messages of PPS1 and the Draft PPS1...” though they went on to pick up a number of points of detail.

1.20 There was considerable debate about the extent to which the FALP policies aligned with the detailed requirements of the Code for Sustainable Homes (CSH). Some argued that these were matters best left to the Building Regulations but we agree with the Mayor that they are issues which should be considered ‘up front’ and not left to the point where effective action may be difficult to achieve.

1.21 Part of the discussion here concerned the level of policy which should be included in the London Plan itself and the extent to which the detail should be left to SPG. We consider that many of the points made, for example, by Fulcrum Consulting and others – important though they were – are matters for SPG or other policy statements. These include, for example, issues relating to the energy efficiency of domestic appliances. But, having said that, GOL and a number of others advocated a much closer tying together of the FALP and the CSH (“additional signposting”, as GOL called it). In response to this the Mayor (BN10, p 4) proposed a form of words, as an addition to paragraph 4.4ii, which indicated that the relevant standards in the SPG would be reviewed at the earliest opportunity and that the Mayor’s Strategic Housing Investment Plan would set out the timetable for moving from Code Level 3 to higher levels for publicly funded housing. We are happy that this insertion should be accepted but others wished us to go further. London Sustainability Exchange (LSx) felt that London – because a great deal of development was likely to take place over the Plan period – should be ahead of the game and should move to Levels 4 and beyond before the rest of the UK. But Bellway and others thought that – since the CSH had been agreed between the house building industry and the Government - it should form the basis of policy. We can understand their wish for a uniform approach (though as we shall see in Chapter 6 this does not extend to other matters such as a threshold for affordable housing provision).

1.22 In BN16A GOL proposed an amendment to the opening part of Policy 4A.2i to refer to the CSH. In BN16D the Mayor expressed reservations about this proposal as “...it is not possible to identify an appropriate level of the Code”. He indicated that he would be pursuing the matter through the Housing Strategy and the SPG on Sustainable Design and Construction. He felt the GOL amendment would not give sufficient guidance to developers. However, he suggested a different and lengthier insertion to paragraph 4.4ii. In BN35 GOL returned to the

issue and suggested a different insertion to Policy 4A.2i together with yet another addition to paragraph 4.4ii; these elaborated on the requirements of the CSH in more detail, dealing with both residential and other development.

1.23 We do believe that a clear reference to the CSH is necessary – it underpins the whole approach - and do not accept the Mayor’s view that this can be left to other documents. We think the FALP themselves need to be brought in line with the latest Government guidance and clearly there was a wish on the part of house builders to achieve this too. The question is how this should be done.

1.24 During the EiP GOL referred us to the report of the Panel into the Regional Spatial Strategy for the North West<sup>4</sup> and in particular suggested the adoption of part of their recommendation R8.17 on page 218, which provided for a “stepped” approach to setting targets (something which the London Assembly also advocated), and also dealt with non-residential development. That Panel faced a similar dilemma and developed a solution; we feel that following their lead can only be beneficial, though their recommendation needs some modification. We think that this covers all the points made by the Mayor and by GOL. Though there would be other satisfactory ways of achieving the same end – for example by adopting the GOL approach in BN35 - we think that by incorporating the CSH requirements as simply as possible, along North West lines, in the policy itself, the room for doubt is minimised. We emphasise that these are minimum standards; the Mayor indicated that Level 3 is being exceeded at present and we would wish to encourage standards higher than CSH levels where possible.

### **Recommendation 1.1**

We recommend that the addition proposed by the Mayor to paragraph 4.4ii, set out at the top of page 4 of BN10, should be accepted. After “...sustainable design and construction” in the ninth line add: “In the light of the Government’s Code for Sustainable Homes, the relevant standards in the SPG will be reviewed at the earliest opportunity. The Mayor’s Strategic Housing Investment Plan will set out the timetable for moving from Code Level 3 to higher levels in the Code for publicly funded residential developments. The Mayor and London Councils...”.

We also recommend that the following bullet points should be added to Policy 4A.2i:

“Promote minimum energy efficiency standards for new homes equivalent as a minimum to Level 3 of the Code for Sustainable Homes by 2010, Level 4 by 2013 and Level 6 “zero carbon” by 2016.

---

<sup>4</sup> North West Draft Regional Spatial Strategy, Report of the Panel, GONW, March 2007.

Promote minimum energy efficiency standards for all other buildings, with reference to the relevant standards in the Building Research Establishment's Environmental Assessment Method (BREEAM).

1.25 A number of other points were made during the discussion. GOL sought a clearer reference to the need to address carbon cutting measures in the growth areas; we agree that this is important and urge the Mayor to take this on board, as he said he would, in the production of strategies and frameworks for those areas. This intention is flagged up in an Alteration to paragraph 2.8 in the London Plan, with respect to the Opportunity Areas (OAs), and we do not feel it requires any further change to the Plan itself. GOL also felt that there should be greater reference to cross regional initiatives; we come back to this in Chapter 3, where we will indicate that we think there are deficiencies in cross boundary working between London and the East and South East Regions. We agree with GOL that this is an issue which should be taken up at an inter-regional level. GOL also suggested that greater attention needed to be paid to certain other sections of the Draft PPS1 Supplement – such as the references to carbon capture and carbon sinks in paragraph 10. We think this is a matter of timing, the Draft PPS having come out too late to be taken fully into account through the EiP mechanism, and we think these are matters for a future review.

1.26 GOL was also concerned about the range and type of developments to which some of the policies would apply – in particular what was the definition of “major developments”? This led to some debate during the EiP and the Mayor clarified his intentions in BN16D by means of a suggested amendment to the glossary. In BN16H he suggested some consequential changes elsewhere in the Plan. GOL responded to this in BN36, and felt that the definitions now given were “clear and helpful”. However they wished to have the opportunity to comment on the list of consequential changes. This was not done before the end of the EiP and the Panel urge the Mayor to consult with GOL on this list; however they are largely factual and we find them acceptable.

### **Recommendation 1.2**

We recommend that the references to “Major development” in the glossary should be amended as proposed by the Mayor in BN16D and that the Mayor should consult with GOL over the list of consequential changes in BN16H.

1.27 The Town and Country Planning Association (TCPA) urged that in order to ensure the co-ordination and delivery of Climate Change measures the Boroughs should be required to produce sustainable energy strategies. The Mayor felt that it was inappropriate to make this a requirement in a regional strategy and, whilst supporting the notion that such plans should be produced, we agree that it would not be right to make it a requirement at this stage.



*Costs of Compliance/Flexibility*

1.28 A number of parties both in written evidence and at the EiP were concerned about the costs of compliance. For example, London First in their statement, though they supported the Mayor's aims, said that: "The Mayor risks undermining London's competitiveness with policies that go beyond national policy and are unviable technically or financially". They feared that the policies would reduce the amount of housing and other development which would take place in London. Others made similar points.

1.29 The Panel do not accept this pessimistic prognosis. We come to this view on a number of grounds. First, we note the comments in paragraphs 40-41 and 50-51 of the Draft PPS on Climate Change. Here the Government indicate that they feel that (among others) developers are capable of adapting to the additional requirements of the PPS. And they consider that the measures would "...not represent a material increase in construction sector costs..." (paragraph 51) (though London First did not agree). Second, as we have already indicated, we feel that it is by the setting of stretching targets that progress will be achieved. We come later to the detail of some of the targets and technologies but as an example it does appear to the Panel on the evidence that the setting of targets for on-site generation is leading to improved performance in this area. Third, we feel that there are potential benefits for London in embracing change, and we note that its competitors are doing so too; 'green' credentials are likely to be an increasing factor in the choice of location for international companies, and add credibility to London's burgeoning role as a dominant centre for carbon emissions trading. Fourth, we note that the costs are reducing and likely to reduce further as measures are adopted on a larger scale. The Mayor argued that mitigation measures must now be regarded as an essential component of development rather than an added cost, and we agree that this mind-set will increasingly be necessary.

1.30 The concern of many of the parties in relation to this debate was what they saw as a lack of flexibility. London First said that the policies were "too prescriptive" and set out some proposals in BN16C (which was described at the EiP as the "route map"; it was supported by other development sector parties and the Mayor responded to it in BN16F). British Property Federation (BPF) felt that "a more appropriate approach would be to set a realistic and achievable target for carbon reduction and allow the applicant to find the best means of achieving it...". Other private sector and development interests made similar points (eg Westminster Property Owners Association/City Property Association – WPOA/CPA).

1.31 In support of this view doubts were cast on the potential efficacy of most kinds of renewable energy generation in London. It was argued for example that certain types of high density development do not lend themselves to particular forms of technology, that micro-climatic issues affect the efficiency of certain measures, and so on. We do not intend to report on all this detail but we have noted it. As an exercise in finding reasons for taking no action this was an

---

effective line of argument, but in a situation where we have accepted the need for change as advocated in the FALP we felt unable to accept this counsel of despair. It reflects an approach that attempts to add renewable energy measures to developments after their form has been decided rather than as an essential component of the initial design. We are conscious that other countries have made much greater progress than the UK in adopting new technologies and we are attracted by the view that London as the Capital City ought to be ahead of, rather than behind, the rest of the country and indeed of Europe.

1.32 We do not therefore accept the view that there should be unspecific targets as recommended by BPF and others. We think this runs the risk of being a recipe for uncertainty and obfuscation, and we do not think it is in line with the Government's approach. We note that GOL in paragraph 5 of its statement were supportive of the Mayor's policies on mitigation.

1.33 Support was also forthcoming from a number of other parties, including LSx (who referred to the London Energy Partnership Toolkit<sup>5</sup>), the Assembly, Fulcrum (at least in relation to housing, though they saw more problems in relation to office development), the London Forum of Civic and Amenity Societies (the Forum), and the London Development Agency (LDA) (who pointed to schemes in which they were involved, such as Gallions Reach).

1.34 Of course much rests on the degree of flexibility which explicitly exists in the Plan - we think it is important that there *is* flexibility. Though we have not accepted the general argument concerning the difficulties of implementation, we do accept that there will be cases where compliance is very difficult and perhaps impossible. The Plan needs to cater for these situations. The Mayor pointed to Policy 4A.15 and particularly to paragraph 4.4i as the places where this flexibility was to be found. The paragraph says the "fullest and most appropriate contributions can be identified in the context of each particular proposal", which obviously seems to leave room for a lesser contribution where circumstances so dictate.

1.35 It was put to us that Boroughs interpret this in different ways; the development sector called for greater clarity. Though the evidence for this was anecdotal we do accept that it might be an issue.

1.36 We think both flexibility and greater clarity might be achieved by the use of the term "presumption" in favour of mitigation measures, with the onus on the developer to demonstrate clearly where circumstances make compliance with targets impossible. While it is not the way in which London First wished to see flexibility expressed in BN16C, we think it would achieve the same end. This presumption would apply, and needs to be stated, in relation to Policy 4A.5i. It should be stated as a general principle in paragraph 4.4i.

---

<sup>5</sup> Integrating renewable energy into new developments toolkit, Mayor of London, 2004. CDL-LW012

### **Recommendation 1.3**

We recommend that there should be a presumption in favour of meeting targets for mitigation, with the onus on developers to demonstrate where circumstances exist which make this unfeasible. The purpose of this is to make explicit the flexibility which exists in the Plan and to indicate the way in which that flexibility will be applied by the Mayor and the Boroughs. We recommend that the following addition should be made to paragraph 4.4i after the second sentence:

“There will be a presumption that the targets will be met in full except where developers can demonstrate that in the particular circumstances of a proposal there are compelling reasons for the relaxation of the targets”.

We later recommend consequent changes to Policy 4A.5i .

#### *The Energy Hierarchy*

1.37 A number of parties in their statements felt that the reference to the energy hierarchy (using less energy, supplying energy efficiently, and using renewable energy) which appears in paragraph 4.19 of the FALP, was not sufficiently prominent. The Panel agree with this, and so did the Mayor, who proposed on page 1 of BN10 to incorporate the hierarchy into Policy 4A.15. GOL subsequently (in BN16E, last page) proposed a further addition to this policy arising from a debate later in the EiP. This dealt with the need to integrate adaptation and mitigation measures. Though London First suggested a simpler formulation in BN16C, the Mayor’s proposal with the GOL addition was generally supported, and we deal with it here for convenience.

### **Recommendation 1.4**

We recommend that the hierarchy is incorporated into Policy 4A.15 as proposed by the Mayor in BN10 and amended by GOL in BN16E. The first part of the Policy should read:

“The Mayor will and the Boroughs should in their DPDs require developments to make the fullest contribution to the mitigation of and adaptation to Climate Change and to minimise emissions of carbon dioxide.

The following hierarchy will be used to assess applications:

Using less energy, in particular by adopting sustainable design and construction methods (Policy 4A.2i)

Supplying energy efficiently in particular by prioritising decentralised energy generation (Policy 4A.5i)

Using renewable energy (Policy 4A.7)

Integration of adaptation measures with mitigation to tackle Climate Change will be sought through the approach set out in Policy 4A.5iii”.

### *Existing Building Stock*

1.38 There were many who felt that the FALP should do more to deal with the energy efficiency of the existing building stock. Reference was made to this in paragraph 4.1iv of the FALP and also in Policy 4B.4i which is in the section of the Plan which deals with “Designs on London”. There was no disagreement whatsoever as to the importance of this issue – the question was what more, if anything, the London Plan, as a strategic plan for the whole of London, could do about it.

1.39 Two propositions came forward. The first was to refer to the Mayor’s Climate Change Action Plan<sup>6</sup> (CCAP) – or even to incorporate parts of it into the FALP. The CCAP does indeed contain much extremely valuable material on this topic in sections 4.1 and 4.2. We do not think it appropriate to incorporate this into the Plan but we do feel that a reference to it would be useful. (We later recommend a fuller reference to it to be added after paragraph 6.91, as agreed by the Mayor in BN16D).

1.40 The second was to bring forward Policy 4B.4i into Chapter 4A, or to cross refer to it. Even though we have reservations about the excessive use of cross references, which can sometimes add to – rather than reduce – confusion, we prefer it to the relocation of the policy and accept the Mayor’s suggestion that it should be added to paragraph 4.1iv.

1.41 Beyond this, however, we feel that measures urgently need to be taken elsewhere but that the FALP themselves cannot sensibly go further. We do not think the seductive suggestion from Fulcrum that developers should contribute to a “carbon reduction fund” to retrofit existing development is compliant with Government guidance on the use of section 106 contributions and we did not hear of other practical proposals at the strategic level.

### **Recommendation 1.5**

We recommend that references to the Climate Change Action Plan and to Policy 4B.4i should be incorporated into paragraph 4.1iv. After the final sentence add: “The Mayor’s Climate Change Action Plan contains further

---

<sup>6</sup> The Mayor’s Climate Change Action Plan, Mayor of London, 2007. CDL-LW049

advice, and Policy 4B.4i of this Plan also aims to tackle the problems associated with existing buildings”.

*Energy Assessments etc*

1.42 GOL in paragraphs 9 and 10 of its statement expressed concern about the requirements for Energy Assessments (Policy 4A.8) and Statements of Sustainable Design and Construction (Policy 4A.2i). The Mayor in response (BN10 p 6) pointed out that these were not new – they appeared in Policies 4A.8 and 4B.6 of the 2004 Plan. The energy assessment forms part of the sustainable design and construction statement.

1.43 There was some debate on this issue at the EiP, with general support for the energy assessment but some concern from London First about the statement of sustainable design. However, we do not see the need to make any recommendation; we see these as constructive and appropriate processes, though we do of course understand the need to make them as simple as possible. It may be that as the CSH is developed and implemented the need for the statement will be reduced. We would, however, urge the Mayor to consider ways in which these requirements could be streamlined – and to consider the extent to which they might be combined with the design and access statement which is already required.

*Environmental inequalities*

1.44 London 21 raised the issue of environmental inequalities in their statement, and referred to the LSx report called “Environmental Justice in London”.<sup>7</sup> The Panel thought this was an important issue and there was a debate at the EiP about it. London 21 felt that the FALP could “barely have said less” about the issue and made a number of suggestions for additions to the Plan. Various points were made in support of this view, and the Mayor expressed his concern that the effects of Climate Change “...had grossly unfair impacts on the poorest people...” – hence the need to do better. There were suggestions that the introduction of Combined Cooling, Heat and Power (which we consider later) would assist the poorer sections of the community by reducing the cost of heat and power, but in general the relationship between the policies in the Plan and the effects on deprived communities was hard to pin down accurately. London 21 advocated the production of an “environmental justice code” for London; this may be a valuable idea but we think it is beyond the scope of the FALP.

1.45 Some Participants, such as London First, felt that it was not appropriate for the Plan to be amended to deal with this issue because it was covered elsewhere – for example through the SA/SEA process (GOL made a similar point). The Mayor indicated that he had other policy initiatives which were aimed at the problem, outside and beyond the scope of the FALP. These included the

---

<sup>7</sup> Environmental Justice in London, London Sustainability Exchange, 2004. CDL-LW038

Energy Strategy<sup>8</sup>, the Green Homes Programme, and others. He also argued that the issue was covered in the FALP – in Objective 4 (which is mentioned in the very first paragraph of Chapter 4A) and elsewhere.

1.46 Nonetheless the Mayor agreed, given the importance of the issue, that additional references to it would be appropriate and in BN16D (p 1) he put forward additions to paragraphs 4.1ii and 4.4i and Policy 4A.15. We have received no comments on these from other parties (they were published after the debate and circulated for comment) but they seem to the Panel to respond well to the points which were made and to go as far as it is reasonably possible to go in this Plan.

1.47 There was a further debate on this topic later when we dealt with adaptation to Climate Change and we think that the changes cover both sets of issues.

### **Recommendation 1.6**

We recommend that the additions proposed by the Mayor in part 1 of BN 16D, dealing with inequalities, should be incorporated into the Plan, viz

Paragraph 4.1ii – penultimate sentence – after “...health...” add “and social and economic welfare...”

Policy 4A.15 third paragraph after “...changes in behaviour...” add “...particularly to address the problems of the most vulnerable...”

Paragraph 4.4i; add at the end: “He will participate in efforts to redress the effects of environmental inequality such as the impacts of higher summer temperatures on the elderly and the problems of fuel poverty.”

### *Monitoring and review*

1.48 We asked whether the arrangements for the monitoring and review of the Climate Change policies were reasonable. This arose especially from the comments of GOL in its statement (paragraphs 14-15) regarding the need for trajectories or other yardsticks to measure progress. GOL indicated that it was not unhappy with the general approach and that the figures of 15/20/25% reduction of CO<sub>2</sub> emissions in Policy 4A.2ii (which we discuss later) were satisfactory. Nonetheless they would like to see a reference to the trajectory notion (which is in the Draft PPS1) and the Mayor agreed to an addition.

### **Recommendation 1.7**

We recommend the addition of the following to paragraph 4.13ii:

---

<sup>8</sup> The Mayor’s Energy Strategy, Mayor of London, 2004. CDL-LW016

“As a common methodology for the definition of regional trajectories becomes available, it will be applied to the targets in the Plan.”

1.49 Friends of the Earth (FoE) and the Royal Society for the Protection of Birds (RSPB) wished to see the introduction of an annual target, and also the monitoring of individual sectors such as transport, retail, housing etc. LSx wanted three yearly reviews, and further monitoring of embedded carbon in building materials. We entirely accept the importance of monitoring and implementation. But we would be concerned if this were to get in the way of policy and action. We think a five year monitoring period is adequate and as GOL pointed out this is in line with the Draft Climate Change Bill.<sup>9</sup> We also believe that there is adequate monitoring of specific factors via a suite of documents which the Mayor produces (the Annual Monitoring Report, the four year State of the Environment Report, the Review of Air Quality Monitoring and so on), and that a Spatial Plan such as the London Plan itself is not the place to go into further detail.

#### *Relationship to PPS22*

1.50 GOL in its evidence mentioned the need to identify “broad locations” for renewable energy generation, as set out in PPS22.<sup>10</sup> The Mayor indicated that this would be done through SPG and incorporated in the next review of the Plan. It is disappointing that this work has not been done – PPS22 is not one of those which emerged during the preparation of the FALP. But the Panel can only urge that it is done as soon as possible. We do recognise, however, that the situation in London – especially in relation to the location of wind turbines – is different from that in other less urban Regions.

1.51 GOL also wished to see a reference to targets for installed capacity in London, as set out in paragraph 3 of PPS22, for 2010 and 2020. This led to some debate about Table 4A.1i on page A71 of the FALP. The Forum felt that it should not be included as new technologies would enable higher targets to be achieved. The Panel do not accept this, but do believe it needs to be the subject of review and the Mayor indicated that it needed updating and re-presenting; this would be done via the Energy Strategy and incorporated at the next review. At paragraph 7 of BN10 the Mayor indicated that the table would also be expressed in terms of the percentage of electricity consumed or supplied, as required by PPS22.

#### **Recommendation 1.8**

We recommend that the definition of broad locations for renewable energy generation is completed as soon as possible and incorporated into the Plan at the next review. We further recommend that Table 4A.1i is updated and revised to comply with paragraph 3 of PPS22 and incorporated into the Plan at the next review.

<sup>9</sup> Draft Climate Change Bill, Defra, 2007. CDL-CG012

<sup>10</sup> Planning Policy Statement 22: Renewable Energy, ODPM, 2004. CDL-CG034

---

## Mitigation – the targets for reducing CO<sub>2</sub> emissions

1.52 Policy 4A.2ii of the FALP sets out targets for carbon dioxide emission reductions – 15% by 2010, 20% by 2015, 25% by 2020 and 30% by 2025. A different set of targets had been set out in the Mayor’s CCAP, which post-dated the FALP, and a number of parties in their statements suggested that this was confusing. However the Mayor clearly indicated that it was not his intention to seek to alter the FALP figures at this stage. The CCAP had not been through a suitable consultation process, the achievement of the targets in it required National policy changes, and he would seek to feed revised figures into a future review. We were content to base the discussion at the EiP on the FALP figures, though it was suggested (and we agree) that a reference to the CCAP and its status might usefully be added to the Plan. The Mayor put forward additions to Chapter 6 (in BN16D point 14) with which we agree.

1.53 A number of Participants (RSPB, the Assembly, LSx, FoE), in different ways, expressed the view that the targets were not sufficiently ambitious. A good deal of evidence was put to us to suggest that the situation was serious, that much faster progress needed to be made (by the Government and the Mayor) and that the dangers posed by Climate Change were severe. We do not repeat this here; the first paragraph on page 2 of the Environment Agency (EA) evidence, for example, summarises it very succinctly. But we do not underestimate the point; we accept the desirability of higher targets and more rapid progress than heretofore. The question, however, is whether the adoption of higher targets would assist. As one participant said, it is pointless having pointless targets.

1.54 Some parties felt that even the targets set out in the FALP were not achievable or realistic; London First and WPOA/CPA felt that the Plan “...ignores development financial viability and places an undue burden on developers”. HBF felt that the targets – whilst possibly appropriate as high level aspirations – should not be included in policy as this would “afford them a degree of weight and status which they do not deserve”. But this was not a widely held view and was not strongly pursued at the EiP itself.

1.55 The Mayor agreed that faster progress was needed; he felt that we were “...going the wrong way at present in the UK”; but he argued that it was necessary to be realistic. He pointed out that the targets were minima, he hoped that they would be exceeded, he intended to keep them under review, but he saw no point in going further at this stage. This view was accepted by others, such as the Forum and the TCPA; both felt that the science suggested we should go further, and that we needed to respond with every measure we could, but both accepted that the Mayor needed to be practical. Others took a similar view.

1.56 The Panel agree with this approach and support the targets in the Plan – but there is one further point to consider. GOL referred in its evidence to the National target of a 26-32% reduction by 2020 (in the Draft UK Climate Change



Bill/p 8 of the Energy White Paper)<sup>11</sup>; others picked up the same point and GOL argued at the EiP that this figure should be put into the Plan. Once again, it post-dated the FALP. However, we accept the Mayor's view that in practice this target is unlikely to be met in London but that it should be considered as part of the proposed review.

1.57 A number of detailed points were made during the debate. London Councils had some concerns about the clarity of Policy 4A.2ii, and what it applied to (see their statement paragraph 1.2); this did not appear to trouble other parties, and London Councils with the Mayor agreed a form of words to be incorporated in the glossary which would deal with their concern. We make no further comment. Fulcrum questioned the use of the term "Carbon" rather than "Carbon Dioxide", throughout the Plan – which the Mayor had proposed in BN5. The Mayor accepted this point – and there was no dissent – and in BN16D (p1) he indicated how he proposed to deal with it.

### **Recommendation 1.9**

We recommend that the targets set out in Policy 4A.2ii should be retained. We recommend that a reference to the Mayor's Climate Change Action Plan, and its relationship to the London Plan, should be incorporated into Chapter 6 as proposed in BN16D, as follows:

"There will continue to be rapid and escalating global, European and national requirements to increase the immediacy and scale of Climate Change mitigation and adaptation as scientific evidence identifies the ever accelerating immensity of the challenge. There will be correspondingly fast and substantial changes in the quality, cost and effectiveness of technologies to address Climate Change. There will also be enormous shifts in behaviours: these will include the greater awareness of and responsiveness to the need for urgent action amongst stakeholders in spatial development, including developers, property interests and planners themselves. The Mayor has set out in his Climate Change Action Plan the many ways in which he will work with others to promote and support changes in policy, implementation and behaviour.

By the year 2026, in significant part as a result of Climate Change, Londoners will lead their lives in fundamentally different ways, including their forms of consumption, housing, working and travel. Spatial planning will need to anticipate, understand, lead and facilitate these changes. The Plan seeks to anticipate change over the next 20 years. The pace and turbulence of these changes mean that the Mayor will continue his approach of reviewing and updating the Plan on a regular basis."

---

<sup>11</sup> Meeting the Energy Challenge - Energy White Paper, DTI, 2007. CDL-CG041

We recommend that “Carbon Dioxide” rather than “Carbon” is used throughout the Plan.

### **Mitigation – on-site renewable energy target**

1.58 Policy 4A.7 of the FALP requires developments to achieve a reduction in CO<sub>2</sub> emissions of 20% by the use of on-site renewable technology. The policy was supported by a paper from South Bank University (their interim report is at BN9), which examined the impact of previous policies.

1.59 We deal first, briefly, and as a matter of fact and accuracy, with a degree of confusion which arose in some of the evidence concerning the relationship of the 20% target to the maximising of energy efficiency and the use of decentralised energy. The Mayor clarified this in paragraph 18 of his statement, and in the London Climate Change Agency’s (LCCA) statement a diagram was produced (p 3) which by general consent clarified the position further. We note and accept the footnote to this diagram proposed by the Mayor in BN16D. The crucial point is that the 20% target is intended to apply to a development’s residual energy requirement after other savings have been achieved beyond those sought by the Building Regulations. Therefore the requirement would not compete with other measures, such as improved insulation, but could well be an incentive to maximise them. This approach appears to have been widely misunderstood, and its clarification was an evident relief to a number of Participants. It needs to be crystal clear if the policy is to achieve active support from the development industry.

#### **Recommendation 1.10**

We recommend that the diagram submitted by the LCCA in their statement should be included in the text of the Plan.

1.60 More substantively, however, there were strong objections to the figure of 20% from the development sector. A figure of 10% has applied across London to date – not as a result of the London Plan but through the Mayor’s Energy Strategy. Some Boroughs have such a policy in statutory plans. The Ministerial Statement by Yvette Cooper on 8 June 2006 advocates a positive policy towards on-site renewables. The Draft PPS1 Supplement refers to DPDs setting out policies for new development to gain “a significant proportion” of its energy supply on-site and renewably and/or from a decentralised, renewable or low carbon energy supply. In paragraph 1.11 and a footnote on page 22 it proposes a standard of 10% in the interim period before the matter is tested through DPDs. It does not appear to prohibit the adoption of different figures.

*A matter for the London Plan?*

1.61 There was debate at the EiP as to whether it was appropriate for the FALP to deal with this matter at all. The HBF for example felt that it was a matter for the Boroughs and should be dealt with on a site by site basis. Others, however, felt that this was likely to cause delay and preferred to see a consistent policy across London. There were various references to paragraphs in the Draft PPS1 Supplement and elsewhere, all of which we have considered. We do not feel, on the basis of the evidence and views which were before us, that there is any reason why the London Plan should not deal with the matter and we note that GOL did not disagree with the policy. We agree that a level of certainty is created by including such a policy in the FALP and that overall it is likely to save time and effort for the Boroughs and indeed for developers to know what is expected.

*The 20% figure?*

1.62 But what should the level be? There was a split. The leaders amongst those who thought that the 20% figure was unachievable/unjustified/impractical (or similar) were HBF, London First, London Councils, WPOA/CPA, Bellway and BPF. Some of them again argued that the various technologies were not effective or viable. Amongst those who supported the policy were the LCCA, the Assembly (who wanted an escalator beyond the Plan period to higher figures), FoE, LSx, RSPB, London 21, TCPA, and the LDA (who usefully referred to experience on some of their own sites and to experience in Europe). Fulcrum, who provided helpful technical information on this issue and throughout the debate on Climate Change, felt that the policy was achievable given that it was based on Part L of the Building Regulations and therefore did not include domestic appliances. (This point was the subject of discussion in evidence and the Mayor in BN10 point 2 agreed to add a statement to paragraph 4.19 of the FALP confirming that Part L was indeed the minimum benchmark and the starting point for the assessment. Fulcrum suggested that this should refer not to the 2006 Building Regulations but to the “current” Building Regulations – as they may change during the life of the Plan, and we agree).

1.63 GOL was concerned that, while innovation was welcomed, any variations from National policy should not stifle development, cause delays, or introduce undue burdens and costs (statement paragraph 25) and that they should provide certainty to developers.

*The South Bank University Study/Arup Report*

1.64 Many views were expressed about the South Bank University study (BN9) which we mentioned earlier. The Panel share some of the reservations which were expressed. The number of cases studied is relatively small. Though there are impressive figures in some of the tables showing cumulatively that there are growing results from the 10% policy currently in operation, we can understand some of the concerns of the parties that since it is very early days, and the sample

did not cover a wide range of developments of all types and sizes, it should be viewed with a degree of reserve.

1.65 The Arup report also contained evidence on this issue (section 10.3, Table 10.2, Annex 3), which was also attacked by some Participants (eg Bellway). Parties raised doubts about individual cases. We view the Arup evidence also with a healthy degree of reserve. The range and number of cases is limited, though again the results do demonstrate an increasing level of experience and success. Experience in the UK is still relatively limited (there is more experience elsewhere) and so the studies cannot be more wide ranging.

1.66 These, however, are the only pieces of research which were available to the EiP and for all their faults they are professional pieces of work and their conclusions are encouraging and cannot be dismissed. We therefore take them into account, but with the reservations we have explained.

#### *Flexibility*

1.67 Many Participants were concerned once again about the degree of flexibility in the policy, and we have already discussed this in general terms. BN16C and F refer particularly to this policy. The words “wherever feasible” appear later in Policy 4A.7 in the FALP, but not up front in the main part of the policy. Development sector representatives wished to see this strengthened, though others (eg the Assembly) wished to see the term removed. The Mayor argued that the over-riding Policy 4A.15 provided for this, and the Plan must be read as a whole. This did not entirely meet the wishes of Participants but we maintain the view we expressed earlier about the use of the “presumption”.

#### *Thresholds?*

1.68 Thames Water Property Services (Thames Water) argued for thresholds; in their view the 20% targets should not apply to smaller schemes. They explained that they carry out a very wide range of schemes across London and feel able to meet the Mayor’s aspirations (which they generally supported) on the larger ones but not on the substantial number of smaller sites which they develop. The case is well set out in their statement. We had some sympathy with this point but feel that a blanket introduction of thresholds would be inappropriate. There will be many smaller developments where the target is achievable. We return to it below.

#### *The Panel’s view*

1.69 The Panel take the view, in the light of the over-riding need to make rapid progress in tackling Climate Change, that on balance the Mayor’s approach should be supported, despite the well argued objections. For all the reservations about the South Bank and Arup work, it seems to us that it is only by taking a strong approach that progress will be ensured in London and the UK. We accept that the 20% figure is challenging, that it will not be achieved immediately across the

board, and that there needs to be a reasonable degree of flexibility. But in the context of the FALP as a whole we think it is right to proceed on this basis. We have considered carefully the points made by GOL in its statement. We think the proposal introduces certainty (a reason for including it in the FALP), and we see no reason why – with a positive approach – it should cause delay or (certainly) stifle innovation. The question of cost is more difficult – but parties at the EiP referred to the need to consider whole-life costs and not just construction costs, and on this basis we think the policy is justified. And as LSx and others pointed out, costs are falling and will continue to fall as larger markets are created.

1.70 We consider that flexibility is necessary however, and can be achieved by returning again to the “presumption” – it should be presumed that the 20% target will be achieved unless it can be demonstrated that it is not feasible or viable. The onus would be on the developer to do this, but we believe that through SPG the Mayor can and should set out the circumstances in which flexibility should apply. We urge the Mayor to accept in so doing that such flexibility is necessary and to make reasonable allowance for the difficulties which developers may have, especially in the early years of the policy; GOL was concerned that the policy should not provide grounds for perverse refusals – an excuse rather than a reason to refuse a controversial application - and this is a valid point to make. But it is also important that the Mayor does not build in a level of flexibility which removes the challenge to developers to find innovative ways of meeting the target. It is not our intention that the policy should be ‘watered down’ but simply that it should be made practical in a changing environment. We do not recommend the Assembly’s “escalator” policy at this stage but it is something which should be considered in a future review.

1.71 This flexibility may reasonably include the potential problems of smaller sites. Sensible provision should be made for this, though there should not be a total exclusion of such sites and Thames Water or similar organisations will need to demonstrate the difficulties in each case (and should be able to do so). It must also take into account the points made in paragraph 23 of the Draft PPS1 Supplement.

#### *The Fund idea*

1.72 A number of parties suggested that instead of requiring on-site provision the Panel should require parties to contribute in some way to a fund set up for the purpose of providing for renewable energy on an area basis. This particularly appeared in the London First “Route Map” (BN16C). Fulcrum felt that the 20% requirement could be relaxed by “...allowing developers to pay into a local fund, to be spent on improving the energy efficiency of the local existing built environment”. BPF and WPOA/CPA made broadly similar suggestions. This had been a matter which had been discussed by Arup (in the first bullet point of paragraph 12.7). They felt that there was a need for further investigation of this proposal; in his statement, at the EiP and in point 5 of BN16F, the Mayor committed himself to investigating the possibility and, if appropriate, pursuing it.

The Panel accept this view. We think that this idea does have real potential and that it should be fully investigated, but that it would not be possible to introduce it into the Plan at this point.

1.73 In the light of all this we recommend as follows:

**Recommendation 1.11**

We recommend that the opening part of Policy 4A.7 should read as follows:

“The Mayor will and the Boroughs should in their DPDs adopt a presumption that developments will achieve a reduction in carbon dioxide emissions of 20% from on-site renewable generation unless it can be demonstrated that such provision is not feasible.”

The Mayor should as a matter of urgency produce Supplementary Planning Guidance which explains the limited circumstances in which exceptions might apply. The Mayor should explore as a matter of urgency the option of contributions to a fund where the provision of on-site renewables is found not to be feasible.

We recommend the inclusion of the addition to paragraph 4.19 of the FALP, regarding Part L, set out in point 2 of BN10, with the Fulcrum amendment in BN34, as follows: at the end of the paragraph, add “Part L of the current Building Regulations will be used as the minimum benchmark and the starting point for the assessment.”

**Mitigation – the technologies**

*CHP/CCHP*

1.74 Policy 4A.5i in the FALP, entitled “Decentralised Energy: Combined Heat and Power”, requires developments to demonstrate that their heating, cooling and power systems have been selected to minimise CO<sub>2</sub> emissions. It says that developments should evaluate combined cooling heat and power (CCHP) or combined heat and power (CHP) systems. It sets out a hierarchy for selection ranging from existing CCHP/CHP systems at the top to gas fired communal heating and cooling at the bottom. The Mayor argued that the policy was not prescriptive and pointed out that the following paragraph (4.23i) allowed a great deal of flexibility.

1.75 Before the EiP, in BN10, the Mayor proposed the addition of a new policy and supporting text (foreshadowed in his statement), to come after paragraph 4.19 and before Policy 4A.5i, dealing with the provision of heating and cooling networks. There was also a small proposed addition to paragraph 4.23ii. On a

detail, GOL suggested the addition of “and establish” between “identify” and “network” in the third sentence at the top of page 2 of BN10 (see point 6 in BN16D). This was agreed by the Mayor and not questioned by other parties. The Panel agree with this proposition. Fulcrum also suggested some amendments (BN34) but we felt these went into a level of detail more suited to SPG; they should certainly be addressed there.

1.76 There was a lengthy debate on this topic at the EiP and we had the benefit of much expertise from amongst others the Combined Heat and Power Association (CHPA), Fulcrum and EDF Energy. We do not intend to report at length on this discussion. It was important and useful – but much of it related to implementation rather than to the basic principle; and much of it will change over time. We agree with the Mayor that it is the role of the Strategic Plan to take the lead and set the direction – though of course to do so there must be evidence that the chosen route is passable. But it is for other documents to deal with the implementation issues. The Mayor indicated that he intended to produce SPG on Renewable Energy and this is where many of the technical points need to be addressed in detail.

1.77 For the record some of the issues which were raised were: whether in some circumstances the use of CHP/CCHP might actually increase emissions (Fulcrum paragraph 20, EDF evidence); whether the generation of heat would add to the Heat Island effect; which fuel was to be used – eg biomass, anaerobic digestion or gasification/pyrolysis for residual waste product, biofuels; the availability of biomass in London (or lack of it), or the costs of transporting it; whether CHP/CCHP is practicable on a small scale or works only on large developments or on an area basis; the possible role of micro-CHP in hotels etc; and issues relating to the Energy Services Companies (ESCOs) and questions of competition. These are all very important issues which need to be examined in the preparation of further guidance. We have taken them into account but do not feel that it is appropriate to go further into these issues.

1.78 We were also pointed in the direction of the application of some of these techniques in various European countries and told of high levels of CHP/CCHP operation in some places. It was argued that this demonstrates that there is no technical reason why London and the UK should not develop them on a widespread basis. We were told that the UK is near the bottom of the league for installing CHP/CCHP and cannot but agree that this is a situation in which we can take little pride. At present, according to the CHPA, fully operating commercially available systems are scarce in the UK but they are likely to become available in the future. They emphasised that this was a “mature technology”. We were told that costs were falling and would continue to fall. CHPA and the LDA made the point strongly that decisions about decentralised energy were commercial, not technical, ones; LDA have various projects under development.

1.79 The question for us is whether there are reasons to go down this route, whether the policies including the proposed one on networks cover the right ground, and whether the hierarchy is sensible and flexible.

1.80 There was no objection to the new policy proposed in BN10. It seems to us that it covers a vitally important issue and should be supported. The provision of the infrastructure, into which future developments can join, is obviously a priority. And ensuring that new development can connect to such networks (as the draft policy requires) is also clearly a minimum requirement as part of a long term objective to move towards decentralised energy. There is no flexibility in the proposed policy on this latter point – “Boroughs should ensure that all development is connected...” – and we think this is right.

1.81 We note that there was also no real objection to the *principle* of decentralised energy. Parties had concerns about the speed of implementation and the technical feasibility of the processes involved but nobody seriously challenged the Mayor’s view (which is also the Government’s view) that there were savings in emissions to be gained from moving to decentralised systems.

1.82 Turning to Policy 4A.5i itself we come to the view that most of the concerns which were expressed at the EiP were about implementation and not about principle. We note that GOL felt the policy was “moving in the right direction”. We were convinced by the evidence of CHPA, LDA and others that there were no real technical problems relating to CHP/CCHP – it is a well developed policy working well in other places. Retro-fitting the technology in a place like London is clearly difficult (as, for example, WPOA/CPA pointed out). But while we respect the various objections which were raised we feel that the leadership shown by the Mayor through the FALP is essential if these processes are ever to take hold and we strongly support the intentions of the policy. The Mayor said that there was a “tidal wave” which would move us along towards the development of these techniques, as a result of his leadership and the development of the market. While we appreciate his picturesque analogy we suspect that we have not quite reached that stage yet; but we believe that this policy, at the strategic level, is the right one at least to create a hefty ripple.

1.83 We have considered whether it is too prescriptive; and whether the hierarchy should be modified. We agree that there needs to be flexibility but have concluded that the policy as it stands is adequate in this regard. We considered the adoption of the “presumption” approach which we discussed earlier but we do not feel that it is either necessary or easy to apply to this policy at this stage. It may well be appropriate, however, in the future. We look forward to the preparation of SPG, and recognise that this may lead to changes at the next review of the London Plan. But at this stage we propose no change.

1.84 There is one further question – which we have already discussed in another context. There was support again for the idea of a fund to which developers would contribute, specifically to underpin the development of



infrastructure networks. CHPA and others warned that this should not become a way of avoiding the thinking process that the hierarchy requires and we agree. Again the Mayor undertook to look seriously at this and we think he should do so urgently.

1.85 On two other details – London Councils asked for a cross reference to the air quality strategy; the Mayor agreed to an addition to paragraph 4.23ii (point 8 in BN16D) and we would accept this if the Mayor so decides – but we don't think it merits a formal recommendation. RSPB were concerned about possible adverse effects on wildlife interests. This is obviously important but we have concluded that there are sufficient safeguards, notably in Policy 3D.12, to ensure that these will be taken into account when considering a particular proposal. The localised impact on wildlife would need to be weighed against wider benefits in mitigating Climate Change, which is itself having an increasingly harmful effect on wildlife.

### **Recommendation 1.12**

We recommend the adoption of the proposed new policy on networks set out in BN10 (and the associated supporting text), with the GOL amendment in BN16D, to follow paragraph 4.19, as follows:

#### **“New Policy: Provision of heating and cooling networks**

Boroughs should ensure that all LDFs identify and safeguard existing heat and cooling networks and maximise the opportunities for providing new networks that are supplied by decentralised energy. Boroughs should ensure that all new development is designed to connect to the heating and cooling network. The Mayor will and boroughs should work in partnership to identify and to establish network opportunities, to ensure the delivery of these networks and to maximise the potential for existing developments to connect to them.

#### *Supporting text*

The LEP's Carbon Scenarios report demonstrates that a CHP-led approach is the most cost-effective mechanism for delivering CO<sub>2</sub> reductions in London. Boroughs can set the planning framework for this by prioritising decentralised energy in all area-based Development Plan Documents. This will provide a systematic way of identifying the opportunities across London for different types of decentralised energy systems, whilst still retaining the principles of additionality and physical connection. It will create a framework for energy to be considered early in the development process, taking some of the burden away from the developer, particularly smaller developers. Some Boroughs have already undertaken technical and financial work to underpin the decision to progress district-wide

schemes.

There are a number of studies already available to help Boroughs in developing this policy approach:

- Mayor of London: The London Community Heating – Development Study, provides indications of heat densities, and the main opportunities for community heating.
- LEP: ‘Making ESCos work’ Guidance and advice on setting up and delivering ESCos.
- LEP: ‘Towards zero carbon; supportive information for Boroughs’ covers a range of planning and non-planning issues.

This area wide approach should provide more market certainty for Energy Services Companies (ESCo) as it should remove some of the risk of developments not being designed to connect to decentralised energy. The scale of opportunity for delivery may also increase competition between ESCos and encourage the creation of small and medium size ESCos to deal with the different scales of development”.

We recommend that addition of the words “CCHP and CHP will need to be sized to minimise carbon dioxide emissions” after the first sentence of paragraph 4.23ii.

We recommend no change to Policy 4A.51 but urge the rapid preparation of Supplementary Planning Guidance, covering the points raised in the EiP about implementation and also dealing with the possibility of a general fund.

### *Hydrogen*

1.86 FALP Policy 4A.5ii deals with the hydrogen economy. It is in truth a fairly general policy – one of exhortation, support and encouragement rather than one setting out firm requirements. It led to only a relatively brief debate.

1.87 GOL in its statement indicated that the Government recognised the potential of hydrogen (paragraph 31). Several parties expressed reservations about its potential in the short term. Fulcrum outlined “several significant barriers”; London First thought it was “too embryonic” for inclusion in policy. Others made similar points. But several expressed support. LCCA saw it as a “robust mitigation strategy” and LDA and others wanted to see it developed.

1.88 We see no reason to recommend any change to the fairly non-prescriptive policy in the FALP.

---

*Distribution networks*

1.89 EDF made a number of useful and interesting points in evidence and at the EiP about the importance of distribution networks, but did not seek any change to the FALP. The Mayor agreed in general with the points made by EDF and indicated that this might be a matter to be considered in a future review. We recommend no change.

**The need to travel**

1.90 The fifth bullet point of Objective 5 in the 2004 Plan reads: “Minimise the need to travel and the growth of journey lengths”. The Mayor proposed in the FALP to change this to “*Reduce* the need to travel *by car* and the growth of journey lengths”. This raised a good deal of comment and objection in representations and we decided for convenience to deal with it while we were discussing Climate Change.

1.91 The Mayor’s argument in favour of this change was summarised in his statement. In the particular circumstances of London the key “...is to shift the mode rather than the length of journey – away from cars towards public transport”. To remain competitive London needed to draw on an extensive labour market – but they had achieved an unprecedented shift of 4% from cars to public transport. The proposed change to the objective reflected this.

1.92 A number of parties disagreed and advocated a return to the original wording. Transport 2000 in particular argued against it; their views are well set out in their statement and we do not repeat them here. They were supported, with varying degrees of vehemence by the Assembly, London 21, South London Partnership (SLP), RSPB, the Forum and FoE. Essentially these Participants believed it important to minimise, not just reduce, the need to travel. Prompted by LSx and TCPA, they accepted a distinction between, on the one hand, people enjoying opportunities for movement which, for example, counters social exclusion; and, on the other, planning policies leading to a requirement for travel, such as the separation of jobs from homes. They felt the new policy was not in line with National policy or indeed with some of the Mayor’s own policies (eg in Transport 2025<sup>12</sup>). The proposed strategy did not address Climate Change.

1.93 Some parties – London First, WPOA, BPF, and Bellway - supported the proposed change.

1.94 In this situation the promotion of an alternative which attracted support from parties on both sides of the argument was a welcome contribution to the debate. This impressive feat was achieved by GOL, which referred in its statement (paragraphs 20-23) to the formulation in PPG13<sup>13</sup>, repeated in the draft PPS1

---

<sup>12</sup> Transport 2025: transport for a growing world city, Transport for London, 2006. CDL-LW008

<sup>13</sup> Planning Policy Guidance Note 13: Transport, ODPM, 2001. CDL-CG047

Supplement: "...to reduce the need to travel, especially by car". Though the Mayor would have preferred the FALP to remain unchanged, or the introduction of some other wording (and he referred to Policy 3C.1 as a guide) he did indicate that the GOL alternative would be acceptable. Others who indicated at the EiP that they would accept the GOL proposal were Transport 2000, the Assembly, BPF, the Forum, RSPB, LSx, and TCPA.

1.95 The Panel agree with the GOL alternative – partly on the grounds that it satisfies many of the parties, partly on the grounds that it is in line with Government policy, and partly on the grounds that it makes sense in the London situation. We think it fits with the Mayor’s aim to shift movement from private to public transport but retains an overall objective of reducing travel in the Capital. We take the TCPA/LSx point about movement not necessarily being a bad thing but balance that against the need, for Climate Change (and congestion) reasons, to take a cautious approach.

1.96 We note that the change we propose may lead to some consequential changes elsewhere in the Plan. The Mayor will need to consider this carefully.

### **Recommendation 1.13**

We recommend that the fifth bullet point of Objective 5 is worded: "Reduce the need to travel, especially by car, and the growth of journey lengths". We recommend that the Mayor considers the need for any consequential changes elsewhere in the Plan.

### **Adaptation – General Approach**

1.97 The policies in the FALP on adaptation to Climate Change were mostly less contentious than the (closely related) policies for mitigation. Policy 4A.5iii sets out the overall approach. A new Policy (4A.5iv) sets out to deal with overheating. A series of policies, some of which were unchanged from the previous Plan, deal with flooding, water and sewerage, air quality and noise. Some of these policies were moved from the "Blue Ribbon Network (BRN)" section of the Plan, with which we deal in the next Chapter. In general, even in the debate on the BRN, the logic of moving these policies was accepted by most parties.

1.98 We asked some general questions about the adaptation policies before moving on to the specifics of the later policies.

1.99 GOL generally supported the adaptation policies, though with various detailed points which we have taken into account in a number of parts of this Chapter. They suggested, in particular, that there should be clearer cross references between the overarching Climate Change Policy 4A.15 and the adaptation Policy 4A.5iii. Once again we agree with the Mayor that over enthusiastic cross referencing is more likely to confuse than to enlighten. However

in this case, GOL suggested some additional wording in BN16E which the Mayor later accepted and which we have already recommended should be included (see above re the Energy Hierarchy, paragraph 1.37). EA also suggested (in the middle of page 14 of their evidence of Jan 3) some additional wording to the penultimate paragraph of Policy 4A.15, adding: "... to plan strategic adaptation measures such as flood risk management..."). We think this would also be a useful but not excessive addition.

1.100 EA sought additions to Policy 4A.5iii. One of these – “minimising water use” was accepted by the Mayor (point 6 in BN10) and we also agree with this uncontroversial addition.

1.101 The second change which they suggested led to the proposal in BN16D (point 9) to add “green infrastructure” to Policy 4A.5iii.

1.102 The debate at the EiP included some useful discussion about Policy 4A.5iv and, particularly, paragraph 4.30ii concerning the extent to which buildings could be designed and oriented to reduce overheating in the summer and heat loss in the winter. Some Participants, such as London First and WPOA/CPA, felt that air conditioning was a necessity (and, according to WPOA/CPA would become more so as a result of Climate Change – something, it seems to the Panel, of a vicious circle). London First supported the policy but did not want it to apply to all buildings – they wanted an addition to paragraph 4.30ii to that effect. BPF told of buildings where financial institutions had insisted on the inclusion of air conditioning even though the intended occupier did not want it and did not intend to use it. But other Participants were clear that this was not a sustainable way forward and that there were developing techniques of passive design which would enable buildings in future to use much less energy. London Climate Change Partnership (LCCP) had some useful things to say about this. The Mayor said that life was going to be different in future and it would be wrong to change policy to allow for the wishes or conventions of the development world. The Panel agree with this and see no need to recommend changes to the FALP to deal with this issue – it is right to encourage innovative design methods, as the FALP do. But on the other hand we do not advocate a complete ban on air conditioning units or systems, as advocated by the Forum, which we think is beyond the scope of the London Plan.

1.103 There was also some discussion as to the application of these principles to the existing building stock. Obviously this is desirable but we were not furnished with any practical suggestions as to how a strategic plan might deal with this matter. The Mayor pointed out that he would be dealing with this – and indeed the whole question of urban overheating – in other documents such as the Sustainable Design and Construction SPG and the proposed Climate Change Adaptation Strategy.

1.104 The discussion went on to consider the importance not just of the buildings themselves but of wider neighbourhoods in tackling overheating and the

urban heat island effect. TCPA in particular referred to the importance of trees and open space, and suggested that there was a conflict between policies on adaptation and policies requiring a high density of housing development. Bellway also made this point. TCPA suggested that increasing the tree canopy by 10% could help keep temperatures around the present level in London; but reducing open space by 10% could cause dramatic increases. They suggested that there should be targets for increasing the amount of tree planting in London. We have sympathy with this, and while we do not feel we have the information to be able to do this at present we urge the Mayor to consider this possibility in future reviews.

1.105 It was, however, this discussion that led the Mayor to support the addition of “green infrastructure” to Policy 4A.5iii. The Forum suggested (in BN56) that this should read “Protecting and enhancing green infrastructure” – largely so that it would sit more happily with the other parts of the policy, which all begin with verbs such as “minimising” or “contributing”; we agree that this would read better.

**Recommendation 1.14**

We recommend the addition of the words “...to plan strategic adaptation measures such as flood risk management...” in Policy 4A.15 as suggested by the Environment Agency (evidence p14).

We recommend that Policy 4A.5iii should be amended by the addition of:

- Minimising water use; and
- Protecting and enhancing green infrastructure.

1.106 During this debate the addition to Chapter 6C which we have already mentioned (point 14 of BN16D) again arose – we support this change as we have said. The proposal in BN5 to refer to the LCCP in paragraph 4.30ii was welcomed. GOL referred to other work which was going on regarding adaptation – especially the Three Regions Climate Change Group and the Mayor’s report on the Urban Heat Island Effect and its impacts on London. We do not see the need to refer to these, important though they are, in the FALP – but this is only for reasons of brevity and we would see no problem in doing so if the Mayor so chose.

*Biodiversity*

1.107 The RSPB advocated in their statement and, at the EiP, an addition to paragraph 3.256 of the FALP to “...aid the adaptation of wildlife, as well as people, to Climate Change”. This was generally welcomed and in BN16D point 12 the Mayor accepted the wording proposed by RSPB. Though various other changes were proposed on similar points by different parties we are satisfied that they are covered elsewhere in the Plan.

**Recommendation 1.15**

We recommend that the following words should be added at the end of paragraph 3.256: “Priority should be given to connecting fragmented habitat and increasing the size of habitat areas with a view to increasing species’ resilience to Climate Change.”

*Living Roofs and Walls*

1.108 In response to a very large number of representations the Mayor agreed before the EiP to introduce a separate policy, to follow paragraph 4.30ii, on living roofs and walls – rather than simply including it in Policy 4A.2i. This was covered in the Mayor’s statement and set out in BN10, point 7. The Mayor proposed a minor amendment to it in BN16D point 11, following particularly a point made by RSPB during the debate which was designed to introduce a degree of flexibility.

1.109 Clearly this removed much of the concern of many of the parties at the EiP – though it increased the concern of some parties such as BPF and HBF, who were concerned about the additional costs which might be involved. Others pointed out that the whole-life costs of a building might be reduced, and that in any event the cost of green roofs was falling.

1.110 A number of detailed points were made, most of which would best be dealt with by SPG. We do, however, have sympathy with a point made by the Forum and others – that green roofs might on occasion be applicable to extensions or smaller developments (the proposed policy refers to “major developments”). We think that this might be reflected in the policy but with a lower level of expectation.

**Recommendation 1.16**

We recommend that the proposed policy and supporting text set out in BN10 and amended in BN16D should be added to the Plan after paragraph 4.30ii, as follows:

**“New Policy: Living Roofs and Walls**

The Mayor will and Boroughs should expect major developments to incorporate living roofs and walls where feasible and reflect this principle in LDF policies. It is expected that this will include roof and wall planting that delivers as many of these objectives as possible:

- Accessible roof space
- Adapting to and mitigating Climate Change

- Sustainable urban drainage
- Enhancing Biodiversity
- Improved appearance

*Supporting text*

Living roofs can take many forms in order to maximise these benefits in a given location. Vegetated roofs, including terraces and gardens, can improve the thermal performance of the building, reduce the urban heat island effect, absorb rainfall to reduce flash flooding, enhance biodiversity, provide amenity for residents who may not have access to private gardens and improve appearance.

High quality designs for 'green walls' incorporating vegetation over a majority of a building's vertical surfaces will also be considered favourably where living roofs are difficult to achieve.

The revised Sustainable Design and Construction SPG will contain further guidance on the appropriate roof type in order to maximise benefits."

We recommend that the following is added to end of the policy: "Boroughs should also encourage the use of living roofs in smaller developments and extensions where the opportunity arises."

## **Flood risk**

1.111 The debate at the EiP on flooding and flood risk took place in what might be described as a fluid situation. PPS25<sup>14</sup> had been published after the FALP. The important "Thames Estuary 2100" (TE2100 – BN14) draft report (or at least a synopsis of it) was received by the Panel on 14 June – just four days before we opened the EiP. The Draft Regional Flood Risk Appraisal (RFRA – BN18) was received on 19 June – after the EiP had begun and only just before the debate on this topic. It is inevitable, given the recent receipt of these documents, and the fact that both of them were drafts which were to be subject to consultation, that our examination of the issue cannot be complete and it may well be that further attention will need to be paid to the matter at the next review. The importance of the issue is not lost on the Panel however.

1.112 There is little point in summarising the new documents very fully here; they are available as BN14 and BN18. The Draft TE2100 was to a degree reassuring about the threat of tidal flooding, though measures such as the creation of downstream tidal storage are needed, and there are potential problems from

---

<sup>14</sup> Planning Policy Statement 25: Development and Flood Risk, DCLG, 2006. CDL-CG036



fluvial flooding. The Draft RFRA contained 23 recommendations, not all of which had relevance for the London Plan. A number of these are covered by existing and proposed policies in the FALP.

1.113 The key Policy in the FALP is 4A.5vi. In his statement on this matter the Mayor proposed to redraft this policy and in BN16D point 15 he proposed a further redraft together with some changes to the supporting text. Other particularly relevant comments are those from EA in its statement and in BN17, and those from GOL in BN36.

1.114 We discussed at the EiP the status of the draft documents and agreed that, in view of their particular importance, they needed to be referenced in the FALP but that they would need to be considered further at a future review. The Mayor's proposed changes to paragraph 4.30 iii and iv in BN16D tackle this issue (and also the need for Strategic Flood Risk Assessments (SFRA) to be produced). EA in its evidence, statement and BN17 wanted a somewhat lengthier reference to the documents (and to the Thames Catchment Flood Risk Management Plan), and also called for a summary to be included in the appropriate sub regional sections of Chapter 5.

1.115 We think the inclusion of a summary is not appropriate. It would duplicate information which is available in the documents themselves, and the details are important. It is also information which may change as the consultation process continues. On the other hand, we think a clearer steer to the Boroughs and other agencies that they must take these documents into account would be valuable, and would further reduce the need for summaries. The Mayor's proposed addition refers to them and indicates that they are important tools which will need to be taken into account in spatial planning documents and decisions. We think this might be stated in the policy itself, rather than just in the text and deal with this below.

#### *Flood Risk Management*

1.116 Leaving aside these important procedural matters, we discussed a number of related issues at the EiP. EA (and others) were particularly concerned to ensure that the basis of the Plan was altered, reflecting PPS25, to "...reflect the change in emphasis from flood defence to flood risk management". They wished to see the title of this section changed to "sustainable planning for flood risk management" – and we agree. EA was anxious that the possible need to safeguard land which may be needed to store flood water in the light of increased flood risk from Climate Change should be identified. In their December evidence they put forward a suggested revision to Policy 4A.5vi to deal with these points. The Mayor's revision in BN16D dealt with the same points but expressed the policy more succinctly than the EA version. We do not feel strongly as to the merits of these two rival versions. They say much the same thing but the EA version goes on to elaborate some of the points with examples and suggestions. There are some points of significant detail – for example whether to use the word "unavoidable"

or “permitted” in the first line. We have considered this carefully and while we generally prefer succinctness we think there are points in the EA version worth keeping; what follows is essentially a combination.

### **Recommendation 1.17**

We recommend that Policy 4A.5vi should be re-worded as follows:

“Where development in areas at risk from flooding is permitted (taking into account the provisions of PPS25), the Mayor will and the Boroughs and other agencies should manage the existing risk of flooding, and the future increased risk and consequences of flooding as a result of Climate Change, by:

- protecting the integrity of the existing flood defences;
- setting permanent built development back from existing flood defences to allow for the management, maintenance and upgrading of those defences to be undertaken in a sustainable and cost effective way;
- incorporating flood resilient design; and
- establishing flood warning and emergency procedures.

Opportunities should be taken to identify and utilise areas for flood risk management, including the creation of new floodplain or the restoration of all or part of the natural floodplain to its original function, as well as using open space in the flood plain for the attenuation of flood water.”

We recommend the following addition to the revised Policy 4A.5vi: “The Mayor will, and the Boroughs and other agencies should, take fully into account the emerging findings of the Thames Estuary 2100 Study, the Regional Flood Risk Appraisal and the Thames Catchment Flood Risk Management Plan.”

We recommend the inclusion of the changes to paragraphs 4.30iii and iv as proposed by the Mayor in BN16D, as follows:

“Reduction in flood risk can be achieved through appropriate location, design and construction of development and the sustainable management of surface water run-off. Boroughs, either individually or collectively, will produce Strategic Flood Risk Assessments. Developers should determine, in consultation with the Environment Agency or the relevant borough, whether their proposed development site is at flood risk. Developers seeking to develop a site at flood risk should undertake an appropriate

flood risk assessment. All flood risk management proposals should avoid increasing flood risk to neighbouring areas.

London is prone to flooding from five sources: tidal, fluvial, groundwater, surface and sewer flooding. Climate Change will increase the probability of flooding from all these sources except perhaps groundwater. The management of flood risk is critical to London's future. Our understanding of flood risk is increasing. The Mayor is undertaking a Regional Flood Risk Appraisal and the Environment Agency is undertaking the Thames Estuary 2100 project and the Thames Catchment Flood Management Plan. These will all be important tools in managing flood risk and will need to be reflected in future spatial planning documents and decisions. Creating additional areas for flood storage will be an important flood risk management tool and the Environment Agency, Mayor and Boroughs should work together to identify and safeguard such areas. These areas may have multiple uses".

We recommend that the title of this section is changed to "Sustainable Planning for Flood Risk Management".

1.117 There was support for these changes from other parties at the EiP – for example from GOL and FoE. The Forum were also in support though they were concerned about the loss of the last sentence in the FALP version of Policy 4A.5vi; however we think the Mayor is right to say that this is essentially covered in the revised version.

1.118 There was concern from some parties, notably GOL, about the extent to which the FALP covered fluvial and sewer flooding. EA in its December evidence had put forward a proposed re-wording for Policy 4A.5v, essentially updating it and drawing attention to SFRA's (which as our recommendation above indicates will be covered in paragraph 4.30iii). GOL in BN36 page 5 supported this change (and also recommended that the title should be changed to "flooding"). GOL said that this would meet its concerns. The Mayor (in BN5) had already indicated that he intended to update this policy to reflect PPS25. Though he felt that the developing RFRA was the place for further examination of this topic, we think that the amendment proposed by EA would aid the clarity of the Plan.

**Recommendation 1.18**

We recommend that Policy 4A.5v is renamed "Flooding" and amended as proposed by the Environment Agency as follows:

"In reviewing their DPDs Boroughs should carry out strategic flood risk assessments to identify locations suitable for development and those required for flood risk management. Within areas at risk from flooding

(flood zones) the assessment of flood risk for development proposals should be carried out in line with PPS25.”

1.119 Thames Water were pleased to see the reference to sewer flooding in the FALP, and the reference (in paragraph 4.30iv) to multi agency collaboration. They and EA were both concerned that adequate sewerage and sewage treatment infrastructure was in place when development took place. This led to a debate – to which we returned later when we discussed water supplies - as to whether the infrastructure needed to be in place *before* development took place. This is a familiar argument, and both the Mayor and development interests felt that it would be quite unreasonable for, in effect, the location of development to be determined by the availability of the infrastructure. London First suggested that development and infrastructure should be provided “in tandem”. This seems an attractive formulation, and we return to it when we deal with Policy 4A.13.

1.120 The RSPB suggested an addition to paragraph 4.30iii to deal with the conservation of habitats and species. EA offered a small amendment to this, and the Mayor accepted it but felt that it would be better placed in paragraph 3.256 along with the change previously proposed to that paragraph in response to RSPB. The Panel are not very concerned as to the location of the additional words, but agree with the RSPB that the sentiment should be included in the Plan.

**Recommendation 1.19**

We recommend that in paragraph 4.30iii (or alternatively in paragraph 3.256) the addition proposed in the RSPB statement, as amended by the Environment Agency, should be included, viz: “A high priority will be given to ensuring that habitats and species are sustainably conserved and enhanced through flood management strategies and schemes.”

1.121 The Mayor indicated in BN5 that he would re-write Policies 4A.5v, 4A.5vi, and paragraphs 4.30iii and iv and 4.88 to be compliant with the newly issued PPS25, though since the EiP we have been told that the changes in BN16D covered all the points the Mayor intended to incorporate. We have dealt with most of these points in the preceding paragraphs in any event. However we would remind the Mayor of proposals by EA in their December evidence (pp 20-22) in respect of paragraphs 4.30iv (this adds some useful material especially about fluvial, surface water and sewer flooding and updates in respect of the RFRA); 4.88 (some minor amendments, updating to reflect PPS25, and a deletion to remove the reference to flood defences being incorporated into buildings. This was not discussed at the EiP and the Panel do not come to a view on it); 4.89 (deletion – partly covered elsewhere including proposed change to paragraph 4.30iv) and 4.89i (to reflect PPS25). Though these do not alter the general thrust of the Plan, we think they are generally useful contributions, if perhaps lengthy in places. We urge the Mayor to carry out his proposed reconsideration of these

paragraphs and to consider whether elements of the EA comments might be included.

**Recommendation 1.20**

We recommend that the Mayor should consider revising paragraphs 4.30iv, 4.88, 4.89, and 4.89i. to take into account the points raised by EA in its evidence as summarised in paragraph 1.121 above..

*Sustainable Drainage Systems (SuDS)*

1.122 Policy 4A.5vii deals with Sustainable Drainage, and though some parties in their evidence had expressed reservations about the opportunities for the use of SuDS in the London context, the policy was broadly supported during the EiP debate. EA in their evidence made various suggestions for change but we think these are too detailed for the London Plan level. Four points were made at the EiP on which we need to report.

1.123 Some parties felt that the hierarchy which is set out in the policy should be placed in the supporting text. London First felt that not all the steps would be practical in all areas, and the Forum also wanted it in the text. But others felt that it should remain in the policy (eg LSx, LCCP, and EA – who felt that it must remain there to comply with PPS25). The Mayor felt that as written it allowed for those cases where some steps were not possible but was very keen that it should have the status of policy. We agree.

1.124 Conversely a number of parties (eg the Forum, LSx, LCCP) wanted a part of the supporting text – that dealing with the retention of soft landscaping in front gardens etc – to be elevated to the policy itself. There was general agreement that this was an important issue. The Mayor argued however that this was essentially a matter for the Boroughs and was not an appropriate matter for the London Plan to deal with as a policy matter. In this case we don't agree; we think that this is an increasingly important issue, and though each case is at a very small scale the cumulative impact is significant. We think that expressing it as policy would make it more likely that it was carried through at the local level throughout London.

**Recommendation 1.21**

We recommend that the Mayor's proposed Alteration to paragraph 4.90 (from "Boroughs should..." to "...existing homes") should form part of Policy 4A.5vii.

1.125 A number of parties raised the question of retention and maintenance, but we agree with the Mayor that this is too detailed a matter for the Plan and needs to be considered through other means.

1.126 The Mayor agreed, in point 13 of BN16D, to include a reference back to living roofs at the end of paragraph 4.90. We support this.

### **Recommendation 1.22**

We recommend that the reference back to living roofs proposed by the Mayor in BN16D should be included in the Plan, viz.: at the end of paragraph 4.90 add “(see also Policy 4A.5v Living Roofs and Walls)”.

## **Water supply, sewerage infrastructure and air quality**

1.127 The key Policies relating to water supply and sewerage infrastructure are 4A.11, 4A.12 (which remains unchanged in the FALP) and 4A.13. In his statement the Mayor suggested significant changes to Policy 4A.13 and paragraph 4.27. These were to reflect the Government’s announcement on 22 March 2007 in respect of the Thames Tideway Tunnel. This announcement was welcomed by parties at the EiP and the Mayor’s proposed changes in this respect are clearly sensible. We return to them below (Recommendation 1.24).

1.128 We should also note that the Mayor had produced (also in March) a Consultation Draft Water Strategy<sup>15</sup>. Much of the detail will be contained in that document as it develops. Thames Water, who were obviously key Participants in this particular debate, welcomed the Water Strategy in their statement, and indicated that they were working with the Mayor to achieve a “...common understanding of the many complex issues involved...” (statement p 2). This augurs well, but did not entirely remove sources of debate and discussion between the two parties at the EiP.

### *Infrastructure issues*

1.129 There were essentially three issues here – the “twin-track” approach, the “in tandem” issue, which we mentioned earlier, and the question of sludge. It was largely Thames Water and the EA who gave us evidence on these topics, though there were others with views to express.

1.130 The “twin track” approach refers to the need to consider water resources and demand side measures together. The Mayor indicated in the Draft Water Strategy that he supports this principle (paragraph 4.4) but Thames Water felt that the FALP did not adequately meet the point. They suggested an amendment to Policy 4A.11 which they felt, as worded, might lead to water resource developments being refused when in fact they remained crucial (statement p 3). The Mayor pointed out that the FALP – for example in paragraphs 4.22 and 4.24 – already recognised this issue. However we accept the Thames Water point that this might usefully be included in Policy 4A.11. (Thames Water made another

---

<sup>15</sup> Water Matters: The Mayor’s Draft Water Strategy, Mayor of London, 2007. CDL-LW051

point about this policy, seeking the removal of the seventh bullet point concerning the need to minimise energy use in water supply processes. They argued that this was covered elsewhere. However, we think that it is a sensible provision – one which we would be surprised if Thames Water were not doing anyway – and propose no change). The Mayor in BN10 point 4 suggested a number of other changes to Policy 4A.11 and to paragraphs 4.22-4.25ii. We recommend that all these changes are accepted. They include changes relating to water use targets; we deal with the debate on this issue later but include the changes here for reference.

**Recommendation 1.23**

We recommend that the sixth bullet point in Policy 4A.11 should be reworded as shown below.

We recommend, subject to the above, that all the changes proposed by the Mayor in BN10 to Policy 4A.11 and paragraphs 4.22-4.25ii should be accepted, so that they read as follows:

**“Policy 4A.11 Water supplies and resources**

The Mayor will work in partnership with appropriate agencies within London and neighbouring regions to protect and conserve water supplies and water resources in order to secure London’s needs in a sustainable manner by supporting the Water Strategy and by:

minimising the use of treated water

reaching cost-effective minimum leakage levels

maximising the rainwater harvesting opportunities

introducing targets for water recycling in major developments

using dual potable and grey water recycling systems

in conjunction with demand side measures, the provision of additional water resources in a timely and efficient manner, to reduce the water supply deficit and achieve a security of supply in London

minimising the amount of energy consumed in water supply processes

ensuring that adequate sustainable water resources are available for major new development and for conservation and enhancement of the natural environment

maintaining and upgrading infrastructure

In determining planning applications, the Mayor will and Boroughs should have proper regard to the impact of those proposals on water demand and existing capacity. The Mayor will and Boroughs should apply a maximum water use target of 105 litres per person per day for residential development, adjusting in future years in accordance with the higher standards in the Code for Sustainable Homes.

4.22 Water is a vital and increasingly scarce resource for which there is rising demand. Chapter 4C contains policies on water as they relate to the Blue Ribbon Network. The Mayor recognises that additional water infrastructure and resources will be required to facilitate London's growth. A clean and reliable supply of water is a fundamental need of everyone. London has a high-quality reliable water supply much of which is supplied from outside London. The concentration of people and services within London can lead to pressure on supplies during periods of prolonged dry or hot weather when water usage increases.

4.22i The Mayor supports implementation of the Water Strategy and an integrated approach to the planning of water, which engages all stakeholders and includes water supply, sewerage and drainage and takes account of the inter-action between them.

4.23 The importance of an integrated approach is likely to increase in the future with the predicted changes to our climate. Hotter drier summers may increase the overall demand for water, whilst reducing availability and stormier rainfall patterns are likely to make it more difficult to retain the water that does fall. When combined with the levels of growth forecast for London, it is vital that a precautionary approach is taken in order to ensure that London's future water resource needs are sustainable.

4.24 The Mayor recognises that failure to make sufficient progress on leakage and demand reduction would lead to worsening water resource deficits for London towards the end of the plan period. The Mayor is also aware of the long lead in times required to implement any major new water supply infrastructure. The Mayor wishes to keep this situation under close review so that if it becomes clear that water shortages are likely, then suitable measures can be put in place in a timely and sustainable manner.

4.25 The amount of water that is lost through leakage in the supply network in the London area is currently estimated to be in excess of 25 per cent of the total amount of supplied water. It is a figure that should be reduced: the Mayor believes that targets for reduction of leakages should be met or exceeded. The pumping of water can be energy



inefficient. Water processes therefore need to minimise the amount of energy used in line with the Mayor's target of reducing carbon emissions.

4.25i Currently only a small percentage of potable water is used for drinking. Many uses of potable water, for example for car washing could be supplied from grey water sources. The Mayor is working with the Government towards a standard for grey water supplies. In the future, this should encourage the installation of dual water systems in new buildings.

4.25ii The water use target for residential development reflects the requirements of Level 3 in the Government's Code for Sustainable Homes. The standards in the Sustainable Design and Construction SPG will be revised at the earliest opportunity and the targets will be changed to 80 litres/day by 2016 at the latest, to align with the timetable set out in the Government's Code for Sustainable Homes for the achievement of zero carbon homes. Future reviews of the London Plan will reflect this timetable and also look to set targets for non residential uses."

The last sentence of the Policy, and Paragraph 4.25ii, have been revised to refer to the Government's targets for water use in the Code for Sustainable Homes (page 10). See below.

1.131 We have no doubt that this will be developed further through the Mayor's Water Strategy and we noted with interest the hierarchy which is proposed in paragraph 4.4 of that document. We think it would be premature to take this further at this stage because the Strategy has yet to go through a consultation process.

1.132 The "in tandem" issue concerns the question of whether infrastructure should be provided in advance of development and we considered this earlier (in paragraph 1.119 above). Thames Water, London First, WPOA/CPA and others made representations on this point.

1.133 We were referred to the Report of the Panel which considered the Early Alterations to the London Plan, paragraphs 4.14 and 4.52.<sup>16</sup> We are not obliged to follow the line taken by that Panel. But we agree with them in this case. They said inter alia that "...however important the provision of infrastructure is alongside the housing delivery, the need for the latter is paramount...an additional mechanism could act as a constraint...that said we remain of the view that development and infrastructure must be properly linked..." (4.14).

1.134 Thames Water were concerned about this issue however. They pointed out that the Thames Tideway Tunnel was only part of the picture and described various other schemes which would need permission and implementation; these had long lead times and the support of policies in the Plan would help to ensure

<sup>16</sup> Draft Alterations to the London Plan, Mayor of London, 2005. CDL-LW019

that they proceeded smoothly through the system. They suggested various additions to Policy 4A.13. EA agreed that these developments were important but advocated the use of the term “in tandem”. We think that this is in line with the previous Panel’s thinking and that it is the right basis for policy.

1.135 Thames Water also wished to see reference to sludge treatment capacity, for reasons explained on page 6 of their statement. Though the Mayor was content with the Plan as it stood, we think that such an additional reference would be helpful.

1.136 In recommending the following rewording of Policy 4A.13 we have taken into account the Mayor’s proposals in his statement, the Thames Water proposals in their statement, and the EA proposals in its December evidence pages 28-29. The dates may need updating in the light of subsequent events.

#### **Recommendation 1.24**

We recommend that Policy 4A.13 is reworded as follows:

“The Mayor expects developers and local planning authorities to work together with water supply and sewerage companies to enable the inspection, repair or replacement of water supply and sewerage infrastructure. Water and wastewater infrastructure requirements should be put in place in tandem with planned growth to avoid adverse environmental impacts.

In particular the Mayor will, and the Boroughs should, support the implementation of the Thames Tideway Sewer Tunnel project and associated infrastructure and sewage treatment from Hammersmith to Beckton and Lower Lee Valley to Beckton.

The Mayor will work with Thames Water, the Environment Agency and other relevant organisations to ensure that London’s drainage and sewerage infrastructure is sustainable and meets the requirements placed upon it by population growth and Climate Change.

Additional capacity for the management of sewage sludge will be needed over the Plan period to meet the requirements of growth and tighter environmental standards. The Mayor will work in partnership with the Boroughs to ensure the timely provision of appropriate new facilities at existing Sewage Treatment Works within London.”

We further recommend that the new paragraph 4.27 proposed by the Mayor in his statement is accepted, as follows:

"In March 2007 the Government announced that Thames Water would build an overflow sewer tunnel to comprehensively address the long term problems of sewage overflows into the River Thames and Lower River Lee. The project will be constructed in two phases, the first phase being from the Lee Valley to Beckton Waste Water Treatment Works. The second phase will be from Hammersmith to Beckton. The project will involve a large diameter sewer tunnel with connecting shafts, access shafts, the expansion of Beckton Waste Waster Treatment Works and an increase in the capacity for sewage sludge treatment at Beckton. The Mayor supports the timely implementation of the project, which is expected to take up to 2019. Boroughs will need to resolve local matters for example, design, construction, traffic management, remediation and mitigation. The project directly affects some 12 London boroughs. The principle of the project is strategically important to delivering a more sustainable London.

There are also a number of tributary streams where sewage pollution from wrongly connected drains remains a problem. The Mayor will look to Thames Water, the Environment Agency and borough environmental health teams to work to resolve these problems."

*Water use targets*

1.137 We have already recommended that changes proposed by the Mayor regarding water use targets, in Policy 4A.11 and paragraph 4.25ii should be accepted, and we incorporated some changes regarding water use which need explanation. There was considerable concern about this issue in evidence and at the EiP. As we indicated earlier the CSH was issued after the FALP had been published and we mentioned that some parties had somewhat unreasonably expected that the FALP could be in line with this then unpublished document.

1.138 In the FALP the Mayor in Policy 4A.11 had indicated a maximum water use target of 40m<sup>3</sup> per bedspace per year for residential development. Many parties in their statements advocated that this should be brought in line with the CSH and we agree. As did the Mayor, and in his proposed BN10 amendments he introduced, in the policy, a target of 105 litres per person per day (which is equivalent to level 3/4 of the CSH as set out on page 10) and, in paragraph 4.25ii, an indication that standards would be revised and tightened in line with the CSH in SPG and through the next review of the Plan. We have made a recommendation in respect of Policy 4A.2i in respect of the CSH. The use of the figure of 105 litres would be in line with this recommendation and we therefore support it. In respect of paragraph 4.25ii we propose an amendment to refer to a target of 80 litres/day, as set out at levels 5/6 of the Code on page 10. We propose a date of 2016 for the achievement of this target, to align with the date by which the Government aims to achieve its target of zero carbon homes, though if it were possible to achieve the target earlier this should be encouraged.

### **Recommendation 1.25**

We recommend – as set out in full in our earlier Recommendation 1.23 - that an addition is made to the last sentence of Policy 4A.11 (as revised in BN10) as follows: “The Mayor will and Boroughs should apply a maximum water use target of 105 litres per person per day for residential development, adjusting in future years in accordance with the Code for Sustainable Homes.”

We recommend that paragraph 4.25ii (as revised in BN10), is altered as follows: delete “...to set out a timetable for moving to the Code Levels 4 and 6 as essential standards...” and add “...and the targets will be changed to 80 litres/day by 2016 at the latest to align with the timetable set out in the Government’s Code for Sustainable Homes for the achievement of zero carbon homes”.

1.139 There was some debate at the EiP about the concept of “water neutrality”. This would essentially involve the use of contributions from development towards the retro-fitting of existing stock. This is an attractive idea, but as yet the mechanics of operating it have not been developed. In principle, retro-fitting was supported by the Mayor and other parties. But, whilst sympathetic, we think this is a matter to be considered in detail at the next review and do not feel that there is sufficient experience to be able to recommend its adoption at present.

#### *Air quality*

1.140 Air quality is dealt with in Policy 4A.6 of the FALP, which is subject to only limited change from the 2004 Plan. We agree, as did all Participants, that this is a serious issue in London, and one which may be exacerbated by Climate Change.

1.141 Much of the debate however concerned detail which might more appropriately be considered through the Mayor’s Air Quality Strategy<sup>17</sup>, which is mentioned in paragraph 4.15 of the FALP. We were told that the National Air Quality Strategy is being reviewed and the Mayor indicated that his own strategy was also being reviewed. There are likely to be matters arising through that process which could be incorporated into the next review of the Plan. A number of parties felt that this should be stated in the Plan, though the Mayor thought it was not necessary as he had an obligation in any case to ensure that the strategies were in conformity with one another. However we see little harm in inserting a few words into paragraph 4.15 to indicate that this review is taking place.

1.142 We took serious note of some evidence which had been submitted by the Knightsbridge Association. Though they were not Participants, they had provided

---

<sup>17</sup> Cleaning London’s air – The Mayor’s Air Quality Strategy, Mayor of London, 2002. CDL-LW031

a lengthy and useful piece of evidence and we raised it as a question during the EiP. We think that most of what they say, important as it is, is a matter to be discussed via the Mayor's Air Quality Strategy. They made a recommendation (pp 6-7 of their evidence), which we considered. It would place a very onerous requirement on the Mayor and the Boroughs, requiring as it would annual air quality plans by postcode and an annual independent verification process. We feel unable to recommend such a process. But we commend the underlying message, which was that problems of air pollution in London are very severe and need determined action, to the Mayor and urge him to consider it as part of the preparation of the strategy.

1.143 A number of detailed points were made about Policy 4A.6. There were some concerns (from the Forum for example) about the loss of the third bullet point in the previous version, which involved setting out criteria in respect of different pollutants against which plans and policies could be judged and proposals assessed.

1.144 The Mayor said that he thought this was "not easily operable" and that it added another burden onto the Boroughs which was not justifiable. We accept this view. Some parties wished to add an explicit reference to health issues in the policy. We feel that this is not necessary as it is implicit in the policy and is also referenced in paragraph 4.15. Fulcrum wished to add a reference to internal air quality but we think this is also implicit and that further detail would be inappropriate at this level.

1.145 It was suggested by GOL and the Forum that reference should be made in the FALP to the Low Emissions Zone and to the Congestion Charge Zone, both of which make some contribution to the improvement of air quality. We are happy to make this recommendation.

**Recommendation 1.26**

We recommend that at the end of paragraph 4.15 the following addition is made: "The Strategy is in the course of being reviewed". We recommend that references are added to the contribution to air quality made by the Low Emissions Zone and the Congestion Charge Zone.

---

## Chapter 2 Blue Ribbon Network

### Introduction

2.1 Chapter 4C of the FALP deals with the Blue Ribbon Network (BRN). In response to criticisms the Mayor proposed modifications to the FALP in respect of the BRN and as outlined in our Overview these were available (BN5 and BN11) to Participants in sufficient time to be taken into account in their written statements and oral evidence at the EiP. Amongst the documents we took into account, as well as the written statements, were a High Court judgement (Lots Road) submitted by Thamesbank (BN19) and Thamesbank's opening statement (BN20). We have also taken account of "The Blue Ribbon Network – Heart of London", produced by the London Assembly in January 2006, especially Chapter 5.<sup>1</sup>

2.2 Chapter 4C of the 2004 London Plan contains 34 policies about the BRN. This is in fact a greater number than there were in the Plan on housing, transport, or indeed any other subject. It is a very lengthy and detailed set of policies. The Alterations proposed by the Mayor involved moving a number of policies, and some supporting text, from this Chapter into either Chapter 4A (dealing with Climate Change) or 4B (dealing with design). In doing this, the Mayor proposed some amendments, in some cases changing policy to text, or deleting some words from the existing Chapter. The Mayor also proposed several changes to the remaining parts of 4C. He regarded almost all of these changes as minor ones – updating, clarifying etc. Virtually none of them was highlighted in the text as being significant in his view.

2.3 However a number of representations expressed strong disagreement with this position; parties felt that the changes were very significant and the Panel accepted that potentially this might be so and included the BRN as a matter for debate at the EiP.

2.4 It is important to state once again that our remit was to consider the Alterations. This was not an Examination of the Blue Ribbon Network Chapter as a whole; it was an Examination of the Further Alterations. A number of representations asked us to recommend Alterations to policies which remained unchanged in the FALP. We are unable to recommend such changes; they are matters which, if they are to be introduced to the Plan, should be included in future reviews and subjected to the usual assessment and consultation processes. We have explained some of the issues which arose in relation to our remit in our Overview; they applied not just to this Chapter but to others.

---

<sup>1</sup> The Blue Ribbon Network – Heart of London, London Assembly, 2006. CDL-WS011

2.5 The Panel accept the importance of the BRN policies. We have great sympathy with the view that the River Thames and the rest of the Network have been “under-used and in some places neglected” (GOL) over a very long period of time. As the Regents Network said in their statement, these places have great importance for their open space value and environment, their educational value, for leisure, recreation and sport, and for transport, trade and employment. The BRN is an asset, it needs to be looked after, and a visionary approach to its protection and use is needed. In saying this we are agreeing not just with those who made representations, but with the Mayor who, in the Plan (in the Objectives at the start of Chapter 4C), and at the EiP, made clear that these were his views too. But of course the BRN needs to be considered in the context of the Plan as a whole.

2.6 In the rest of this Chapter we do two things. First we consider the general point as to whether the proposed Alterations unacceptably weaken the BRN policies or whether, as the Mayor argued, they make them more effective. Second we deal with a large number of detailed points. In doing this, we leave aside most of those that have already been dealt with through BN5 and BN11. We deal with those Alterations which we feel have an impact on the main question of the strength and effectiveness of the BRN policies. And as already indicated we do not deal with comments on those parts of the Plan which are not the subject of Alterations (though we do refer to one or two of these as we go along).

## **The Strength of the BRN Policies**

### *Priority of BRN policies*

2.7 It was argued at the EiP, by the River Thames Society and others, that the BRN policies should have priority over other policies in the Plan. We think we should say at the outset that, however important the Network may be, we cannot accept that view. Nor would we accept it if it were argued that, for example, the housing policies should have primacy, or that the transport policies should be so treated. It is in the nature of Strategic Plans such as the London Plan, and indeed of other kinds of plan, that considerations have to be taken in the round.

### *Keeping the policies together*

2.8 Here we consider in general terms whether the movement of policies to other parts of the Plan is acceptable. We consider the detail of each case later. It was argued by a number of parties that it was important to keep all the BRN policies together in Chapter 4A and that to remove some of them to other parts of the Plan was to weaken them. It was argued that, by locating them all in one place, it was easy for developers and others to see the approach to the BRN in a convenient and comprehensive way. To ask them to look at the BRN Chapter but also to look at policies in other parts of the Plan was difficult. As the Regents Network (for example) put it “...we need to be able to say directly to Authorities

and developers that they should have regard for the BRN and please follow the BRN policies...it is a very different matter if we say “there are some waterway policies...and also relevant policies on a number of other pages” (statement p 2). Thamesbank said (BN20 p 2) that there is a “...symbolic and practical strength in identifying the river as having an identifiable set of applicable policies and considerations which make development on its banks a different proposition to development elsewhere. From a practical point of view it is more efficient and effective to have the policies in one place...”. Others made similar points, though there was not unanimity; GOL for example felt that the changes did not unacceptably weaken the approach to the BRN; as the Plan should be read as a whole it did not object to the relocations. London Waterways Commission (LWC) were “not worried” by the move but wanted to make sure the policies remained visible and were easily found.

2.9 This was said against a background where it appeared that not all of the Boroughs were applying all of the BRN policies in a strong and consistent way. This was an issue which arose in relation to a number of policies right across the EiP. We had little direct evidence of this (though in fact the “Heart of London” document gave some examples of good practice) but it was a point upon which the Mayor and the other Participants agreed – even though their analysis of the remedy was not the same. If it is true, it is disappointing.

2.10 The view of the Mayor was that it was to the disadvantage of the BRN that it was seen as separate. It tends, as a result, not to be turned to. The BRN is not a “closed system”. The essence of the Plan is inter-connectivity. The Mayor felt that the movement of some policies to the design section of the Plan would in fact give greater prominence to them, and act as a window to the BRN policies themselves. The proposed reference to the BRN in the overarching design policy – 4B.1 – for example would mean that attention was readily drawn to it. It would “raise the profile of the relevant waterside design issues to be alongside and in one place with the other important design issues in Chapter 4B” (statement, paragraph 4). The movement of certain other policies to the Climate Change section was, the Mayor argued, logical given the vital importance of that issue. Policies on matters such as flooding, drainage, and groundwater affected not just the BRN but had strategic significance for the whole of London and fitted well with the other Climate Change adaptation policies. The Mayor stressed that he thought the changes were minor and he promised that there would be comprehensive cross referencing from other Chapters to the BRN. The Mayor concluded that the “...FALP provides a strengthening of water related policies in the Plan as a whole by reinforcing the relationship with policies on climate change and design” (statement, paragraph 7).

2.11 The Panel find this a difficult issue. We can see the force of the point that the objectors are making and we can understand the argument that a single set of policies has strength and symbolic significance.



2.12 On the other hand, we note that even in the present Plan not all of the policies which relate to the waterside are in Chapter 4C. There were references during the debate, for example, to the view protection framework and to World Heritage Sites, both of which are and will remain in Chapter 4B. We acknowledge the point made by the Regents Network that building design "...has a completely different relevance when the development is in a waterside environment" but we do not accept that this important truth cannot be captured in generic design policies. We also note the point made by the Mayor that other parts of the Plan – for example on housing or open space – do not contain a full set of policies, dealing with design for example, but require reference to other cross cutting Chapters such as 4A, 4B and 4C. In this respect the Mayor's proposed way of dealing with the BRN does not differ from other subject areas. And we note that by general consent the BRN policies, laid out as they are in the 2004 Plan, are not working as well as they might at present.

2.13 On balance we believe that the principle of moving the policies is justified. We think that the move of Climate Change related policies is clearly sensible, and we note the relatively limited objection to this. We also think it is the case that developers and others will generally go to policies in Chapter 4B, and through them can be directed to Chapter 4C where waterside issues are involved. We think the cross referencing promised by the Mayor is particularly important and should be clear in Chapters 4A and 4B. Though we have elsewhere expressed reservations about cross referencing, we think it is justified in this case in order to ensure that the other Chapters act as a 'gateway' to the BRN.

### **Recommendation 2.1**

We recommend that, while the movement of certain policies from Chapter 4C to Chapters 4A and 4B is acceptable in general terms, there needs to be clear cross referencing to the Blue Ribbon Network at appropriate points in the published Plan.

### **Details of Alterations**

2.14 Notwithstanding this overall conclusion we now turn to the points which were raised by Participants on the specific proposals in the FALP. We deal with these in the order in which they occur in the FALP, not necessarily in order of importance. As indicated earlier we have not for the most part considered comments on the unaltered parts of the Chapter though we do refer to one or two of the more significant ones. We deal with comments specifically on Chapter 4C first, then come to some points of detail in other parts of the FALP.

*Paragraph 4.73*

2.15 There were calls to re-instate paragraph 4.73 but this did no more than set out a list of the topics to be covered in the Chapter and we are content that it is omitted for the sake of brevity.

*Paragraph 4.75*

2.16 This paragraph, which deals with the need for “...balancing competing economic, social and environmental interests to contribute to achieving sustainable development...”, is substantively unchanged and we therefore do not make a recommendation on it. But we think it worth noting that several parties wished it to be deleted. In our view, had that been within our remit, it would have been wrong to have made such a recommendation. We might perhaps have suggested that economic, social and environmental interests are not always oppositional but can be complementary. Nonetheless, the thrust of paragraph 4.75, to look at these interests in the round, must apply in the BRN as elsewhere, as PPS1<sup>2</sup> requires, and it is right to refer to it.

2.17 The Mayor agreed (in BN5) to re-instate the reference in paragraph 4.75 to the action plan in Annex 5 of the FALP.

*Paragraph 4.76*

2.18 The Mayor proposed to delete paragraph 4.76, but a number of parties wished to see it retained. There was general acceptance that the first part of the paragraph was no longer relevant, referring as it did to the evolution of BRN policy, but parties wanted to keep the middle part in particular; (ie “One fundamental change is that the water is not seen as merely a setting for development. Rather this Plan promotes the use of the water related spaces.”). Some parties also wished to retain the last sentence, which referred to a variety of sustainable uses for water related spaces. The Mayor felt that these referred to changes from the old RPG3b/9b to the London Plan and were not relevant now. He considered that the same points were made in paragraph 4.74 though Thamesbank, for example, did not agree.

2.19 Though we do not see these words specifically set out in 4.74, we think they are implicit in that paragraph – “a visionary approach to the BRN, taking the water as the starting point for decision making” - and also, especially, in paragraph 4.49i (which we later recommend should form part of Policy 4B.4) and in various other places. We do not consider that the deletion of paragraph 4.76 weakens the Plan.

---

<sup>2</sup> Planning Policy Statement 1: Delivering Sustainable Development, DCLG, 2005. CDL-CG027

*Policy 4C.1*

2.20 The Mayor proposed in the FALP to delete the words “Decisions should be based upon the Blue Ribbon Network Principles” from this policy. A number of parties objected to this. The Mayor said that this sentence should never have been in the Plan and was incorrect in a technical sense; decisions could not be based on principles but only on policies and evidence. Though others disagreed, we think this is right and we accept the Mayor’s view. There were some suggested revised versions of the sentence but we do not think they add to the London Plan. As part of the statutory development plan, all the Plan policies have application, whenever relevant, to decision making. It is unnecessary and potentially confusing to attempt to make this point expressly with regard to one particular set of the policies. We agree with the Regents Network that the second part of the policy should be in italics (this is a printing error) and the Mayor accepted this at the EiP.

*Paragraphs 4.84i and ii*

2.21 The Mayor proposed in his statement to make significant changes to these two paragraphs. These were corrections made in response to comments from the Environment Agency (EA), concerning technical updates arising from the Water Framework Directive.<sup>3</sup> We agree they should be incorporated and they were not contentious.

**Recommendation 2.2**

We recommend that the changes to paragraph 4.84i and ii as set out in the Mayor’s statement should be made – to read as follows:

“4.84i The Water Framework Directive (WFD) 2000/60/EC requires the UK to aim to achieve “good” status for all inland and coastal water bodies by 2015. This is likely to present some major challenges given the current condition of some of the rivers within London. The WFD seeks to integrate the management of water with land use planning, biodiversity, flood risk management, tourism, leisure, recreation, health and agriculture through River Basin Management Plans. The Environment Agency is leading on the preparation of these River Basin Management Plans in England and Wales.

4.84ii The Environment Agency has identified the Thames to be a single River Basin Management Plan area and London falls wholly within the Thames River Basin Management Plan. The GLA and London Councils are both represented on the Thames River Basin Liaison Panel and are helping to shape the River Basin Management Plan. Future reviews of the London Plan and DPDs will need to consider the River Basin Management Plan.”

<sup>3</sup> Water Framework Directive, European Commission, 2000. CDL-EU001

*Policies 4C 6-9 and paragraphs 4.87-93*

2.22 These policies deal with flood plains and flood defences, sustainable drainage, and rising groundwater; we have already mentioned that they are moved in the FALP to Chapter 4A on Climate Change. There were some objections to this, from the Regents Network and the River Thames Society for example, essentially on the grounds we have discussed of keeping the policies together; but in general parties did not pursue this strongly at the EiP. We agree that it is logical to move these policies in the way described and have of course reported in Chapter 1 on the debate which took place on these matters. Suitable cross references should be included.

*Policy 4C.10 and 11 and paragraphs 4.94-95*

2.23 The Mayor proposed in the FALP to move these two policies into Chapter 4B (Design). Both of them were to be converted from policy to text. These proposals raised a large number of objections. Several parties complained that from the published FALP it was difficult to see what had happened to these policies and particularly to the supporting text; we agree with this comment – it was necessary to look back to the 2004 Plan to see what had been lost (the same applies later to the changes in respect of policies 4C.20-21 and indeed to the earlier section – 4C.6-9). This is regrettable but copies of the earlier policies were available at the EiP and we felt able to deal with the matter thoroughly.

2.24 Policy 4C.10, which dealt with the historic environment, had been incorporated into the section of Chapter 4B entitled “Built Heritage and Views” (not archaeology as some parties thought – a matter which needs to be made clearer in the published Plan). Additions, including a reference to the protection of cranes and waterway infrastructure, had been built in to paragraph 4.62i. It was pointed out that the part of Policy 4C.10 which dealt with the tidal foreshore had been lost. (The foreshore is mentioned in Policy 4C.3 in relation to biodiversity, but not in relation to its historic importance as it was in the former 4C.10).

2.25 We have already reached a conclusion on the general question of whether moving policies to another part of Chapter 4 is acceptable. The issue in this case is whether anything important has been lost in the transition. We think that in respect of the policy itself, it has. We think the reference to the tidal foreshore should be included in the Plan and the Mayor indicated at the EiP that he would agree to this.

**Recommendation 2.3**

We recommend that the words “...and the tidal foreshore” are added to the end of the last bullet point of Policy 4B.12.

2.26 The only part of paragraph 4.94 (which relates to Policy 4C.10) which has been lost is a reference to the fact that the four World Heritage Sites and

numerous Conservation Areas and listed buildings are situated alongside waterways: the Forum in particular objected to this. We think these are obvious factual points; we considered whether they should be added to paragraph 4.57 or 4.62i but in practice the same sentiments are already present. (In Appendix B we endorse the Mayor's suggested strengthening of Policy 4B.13: World Heritage Sites).

2.27 Policy 4C.11 (supported by paragraph 4.95) dealt with Conservation Areas. In the FALP it is covered in an abbreviated form in paragraph 4.62ii and there are also relevant additions to Policy 4B.12. The policy was in any event a relatively brief one and we are satisfied that it is adequately covered in the amendments to Chapter 4B. The second part of paragraph 4.95 is essentially covered in 4.62ii but we have considered the points in the first part, which were largely of a technical nature in relation to the definition of Conservation Areas (and whether their boundaries should extend into water space). We think this is important, but not a strategic matter for the London Plan.

2.28 It is important that suitable cross references are included in Chapter 4B.

#### **Recommendation 2.4**

We recommend that suitable cross references to the BRN are included in the "Built Heritage and Views" section of Chapter 4B.

#### *Policy 4C.12*

2.29 This policy is not proposed to be altered in the FALP. We received a number of representations to the effect that it should be strengthened, and its meaning was clearly an important issue in the Lots Road case (BN19). We note the Judge's interpretation of the policy; and we note from BN20 that Thamesbank wish to see it interpreted differently, or altered to give it a meaning which is substantially different from that which the Judge determined (BN20 p 6). The issue is being pursued in the Court of Appeal. We are not at liberty to recommend such a change, even if we wished to do so, but note that it would significantly change the balance of the Plan if it were altered in the way suggested.

#### *Policy 4C.14 and paragraph 4.103*

2.30 There was a consensus about the desirability of promoting water borne freight but several suggestions were made as to very detailed wording changes. We have considered these, but we are content with the wording as proposed by the Mayor in BN11, which provides clarification.

**Recommendation 2.5**

We recommend that the alterations to Policy 4C.14 and paragraph 4.103 as set out in BN11 are incorporated into the Plan, viz:

Policy 4C.14: add the following text to the end of the policy: “New development close to navigable waterways should seek to maximise water transport for bulk materials, particularly during demolition and construction phases”.

Paragraph 4.103: delete text: “Major new development projects close to navigable waterways should seek to maximise water transport for bulk materials”.

*Policies 4C.17 and 18*

2.31 In these policies, which deal with access and support facilities on the BRN, the Mayor responded to representations and agreed to reinstate “areas for intensification” as part of his revision of paragraph 4.99 (see BN5 and BN11).

**Recommendation 2.6**

We recommend that the changes proposed by the Mayor to paragraph 4.99 are made; add “or Areas for Intensification” after “Opportunity Areas” and update the list of Opportunity Areas and Areas for Intensification which follows paragraph 4.99 as shown in BN 11.

*Paragraph 4.116i*

2.32 This paragraph refers to research on the provision of boatyard facilities. This was due to be published shortly after the EiP and the Mayor undertook to carry out a factual update when the Altered Plan is published. The Forum wanted the paragraph to go further than “may consider recommending the safeguarding of facilities...” and wanted a commitment to do so. The Mayor argued that this was premature pending the results of the research. We accept this but urge the Mayor to consider the point further when the research is available.

*Policies 4C.20 and 21 and paragraphs 4.119-125*

2.33 It was the proposal by the Mayor to reduce these two policies and their supporting text and remove them to Chapter 4B that probably gave rise to the greatest level of concern during the debate on the BRN. Policy 4C.20, entitled “Design – starting from the Water”, and 4B.21 – “Design Statements” and its supporting text were proposed to be reduced, essentially into Policy 4B.4, and paragraphs 4.43i and 4.49i. The addition to the overarching design Policy 4B.1 of a reference to the BRN is also relevant, as are the proposed alterations to

---

paragraphs 4.39 and 4.49 (which mention “waterways” and “waterside resources”).

2.34 We should consider the freight question of whether Policy 4C.20 as it stands is a policy concerned with design, or whether – as Thamesbank argued – it is also concerned with uses. This was an issue in the High Court case (BN19). We are content to rest on (inter alia) paragraph 47 of the judgement which says: “...It is not a use based policy. It is clearly a design based policy...”. We are aware that this is subject to consideration by the Court of Appeal. But it is the view taken by the Mayor, the Inspector in the Lots Road case, the Secretary of State and the Judge. We take it no further.

2.35 Thamesbank put forward a suggested revision to the policy in BN20. In a similar way to the change they proposed to Policy 4C.12, this would prioritise land alongside the water for uses that require a waterside location (“Water related spaces should be used for uses that require a waterside location”). We do not feel able to recommend this change. What Thamesbank advocated goes beyond a modification to the published Draft Alterations and would amount to a new broad strategic policy for the Plan, with evident major implications. It has not been subject to public consultation nor considered by the FALP Sustainability Appraisal. It is something which, if it were to be pursued, would need to be the subject of a future Alteration.

2.36 We have already considered the question of moving material to Chapter 4B. We have concluded that in principle this is acceptable; placing the design sections from Chapter 4C into 4B would not weaken them so long as there is adequate cross referencing.

2.37 The key issue, therefore, is whether the movement and changes associated with these particular policies unacceptably weaken the Plan. A number of Participants felt very strongly indeed about this – one talked of “desperation”. Among those who were concerned were the Forum, the Regents Network, the Creekside Forum, British Waterways, the River Thames Society and Thamesbank. The Mayor felt that the effect was in fact to strengthen the policies. He felt that the text which had been lost was covered elsewhere, or in some cases was no longer appropriate for the London Plan (for example in relation to the preparation of SPG, mentioned in paragraph 4.121, which he no longer proposes to carry out, believing that it is a matter for the Boroughs).

2.38 We have looked at the policies concerned in detail. The opening part of the previous Policy 4C.20 appears partly in the new 4B.4 and partly in paragraph 4.43i. Parts of the list of bullet points which follows have disappeared – though aspects of it are covered in other Chapter 4A and 4B policies and paragraphs. Much of the supporting text in paragraphs 4.119-4.122 has also gone but a key section of it has been included in paragraph 4.49i. The requirement in former Policy 4C.21 for Design Statements appears, in shorter form, in Policy 4B.4. Some of the detail has been lost. We think it was largely a statement of good

practice in the production of Design Statements which is not appropriate for inclusion in the London Plan – but better flagged up as the Mayor now proposes in the reinstatement of paragraph 4.137 (obviously omitting the final sentence) to be located after paragraph 4.43i (BN11). Policy 4B.5 also deals with some of it (though not specific to waterways). Former paragraphs 4.123-125 deal with views and tall buildings, both of which are covered elsewhere in Chapter 4B. There are relevant references to river prospects in unaltered Policy 4B.16 and unaltered paragraph 4.71.

2.39 Our conclusion is that, while the principle is acceptable as we have said, the changes in this instance are also mostly acceptable but there are some points in the previous policies which we think worthy of retention.

2.40 GOL suggested in its statement that part of proposed paragraph 4.49i should be included in Policy 4B.4. We support this; it is in line with the Mayor’s vision retained in the unaltered paragraph 4.74. The statement there: “...water space needs to be set at the heart of consideration of development along the waterside – the water must be the starting point” seems to us to be a particularly important one, and to meet many of the aspirations of Participants; to include a similar statement in policy would, we think, strengthen policies in relation to the BRN (this was not part of policy before but appeared in paragraph 4.120 of the 2004 Plan). GOL suggested that “needs to be set at the heart...” ought to be replaced by “should be at the heart...” and we think this is marginally better wording.

2.41 We also think that some of the points in the bullets in Policy 4C.20 are useful, and should be included in the supporting text of Chapter 4B. We think that in place of the second sentence of paragraph 4.49i a brief summary of those bullet points not covered elsewhere in the FALP should be included.

### **Recommendation 2.7**

We recommend that the second sentence of paragraph 4.49i (with the suggested GOL amendment) should be included in Policy 4B.4, viz: “Water space should be at the heart of consideration of development along the waterside – the water must be the starting point”.

We recommend that a brief summary of those bullet points in the former Policy 4C.20 which are not covered elsewhere in the FALP be inserted, located with paragraph 4.49i.

### *Paragraph 4.131*

2.42 Paragraph 4.131 deals largely with procedural matters, and in particular the way in which the Boroughs carry through the BRN policies into other documents. South London Partnership (SLP) welcomed the proposed changes,



and felt the requirements in the published Plan for regular review were superfluous. But others were concerned about proposed Alterations – especially the loss of the last sentence. The Forum and others were concerned that the Boroughs were not carrying policy forward fast enough. The strategies were being “by-passed” (not everybody agreed with this) and it would be a long time before DPDs were in place.

2.43 Various suggestions for strengthening this paragraph were put forward (such as the replacement of “inform” (DPDs etc) with “guide” and the Mayor accepted these changes and the reinstatement (slightly revised) of the last sentence. He put forward a proposed revision in BN55 which the Panel accept.

### **Recommendation 2.8**

We recommend that paragraph 4.131 is altered as proposed by the Mayor in BN55, to read as follows: “Boroughs, in collaboration with the Mayor and other stakeholders, should carry out appraisals of the river and its environs. The Thames Strategies Hampton-Kew and Kew-Chelsea, fulfil this role but will need updating to take into account the London Plan. The Thames Strategy East is being developed in line with this Plan. These appraisals should be used as guidance for DPDs, AAPs, and development control decisions. They also include specific implementation projects for Local Authorities, the UDC, other public agencies or other organisations in a position to implement river related projects. They should also be used to identify important riverside sites and determine the river related expectations for them. The strategies should be kept under regular review”.

### *Policy 4C.28*

2.44 A revision to Policy 4C.28, which deals with development close to canals, was put forward in BN5. British Waterways wished to see the word “close” revert to “adjacent”, as it had been before. We prefer the BN5 formulation because we accept the Mayor’s view that the policy could apply to certain developments separated by a short distance from the water’s edge. There were also concerns about the loss of a reference to a Design Statement but it was explained, and we accept, that this is covered elsewhere.

### *Paragraphs 4.136-4.137*

2.45 In the FALP it was proposed to delete both of these paragraphs. We have already referred to the reinstatement of most of paragraph 4.137 (to follow paragraph 4.43i in Chapter 4B – see BN5). Some Participants also wished to see 4.136 retained but we think that it adds little to what is already in paragraph 4.135 and elsewhere. The Forum wanted 4.137 to set out a “requirement” for Boroughs to carry out character assessments but we accept the Mayor’s view that this would

be “heavy handed”; there are already many demands on the Boroughs and it would not be appropriate to add another one.

*Policy 4C.29*

2.46 There were objections to the proposed deletion of Policy 4C.29 but the Mayor explained that this – on careful reading – would in fact constitute a strengthening of the policies. It had provided a loophole which could enable the provision of permanent moorings, potentially in conflict with Policy 4C.18. In the light of this some parties wished to retain the first sentence of the policy only; but the Mayor argued that this appears elsewhere in the Plan (Policies 4C.3 and 4C.4) and we accept this. Some argued that the remainder of the policy should be retained but its meaning should be reversed – a proposition which we do not accept; as the Mayor said, the idea of retaining the policy to say the opposite is not logical. In any event we think the point is covered in other policies.

*Paragraph 4.144.*

2.47 This paragraph deals with the use of the Royal Docks as a bypass to the Thames Barrier. LWC wished to see it re-instated (they were not present at the session) but we were satisfied with the Mayor’s explanation as to the impracticability of the original proposal.

*Rest of Chapter 4C*

2.48 We think that we have dealt with the most important points in relation to Chapter 4C. There were some other points of fine detail in the representations which we have not considered. There were other points including references to unaltered policies and paragraphs which we have not considered because they are beyond our remit.

*Annex 5*

2.49 Annex 5 is a report on the “Implementation of the Blue Ribbon Network”. It sets out progress as at 2006. As mentioned earlier, the Mayor agreed to reinstate the link to Annex 5 which he had proposed to delete from paragraph 4.75, and the Panel welcome this.

2.50 Parties raised a number of points about the progress set out in the Annex. In our view it does not represent policy, which we can influence; but it is an important statement of fact and one which should be the subject of continuing debate within London. It needs to be kept up to date. It may arguably need strengthening, as the River Thames Society suggested (see their statement), in view of the apparently slow implementation of the policies by the Boroughs, and more action may be needed to promote the BRN - but these are matters of process outside the London Plan itself. Issues such as whether the three advisory groups should be amalgamated into one (item 9), to which a number of parties objected,

or whether there should be more stakeholder involvement in the LWC, are we think well beyond our remit. We therefore make no recommendations on Annex 5. The question of setting targets and indicators, raised by Thamesbank and others, would also be a matter to be dealt with outside the Plan, if it were to be pursued.

### *Open Space/MOL/Blue Belt*

2.51 Some Participants argued that the BRN might be included in Table 3D.1 on page A68 of the FALP, which deals with London's public open space hierarchy. The West London River Group argued that it should be included under "linear open space" (the sixth category) and also under "Regional Parks" (the first category). The Forum agreed and also argued (agreeing with others) that the BRN should be designated as Metropolitan Open Land.

2.52 This was strongly opposed by the Mayor, who pointed out that the BRN would then become subject to all kinds of other policies in the Plan which could prevent things from happening on the waterways which everyone agreed were necessary – such as wharves, jetties, cranes, and the use of the waterways for transport. We agree with this and we think that such designations would not only be unnecessary but could have unintended consequences.

2.53 Similar objections might apply to another proposition – that the BRN might be designated as a "Blue Belt" (rather similar to a Green Belt). This was proposed, for example, by the Regents Network in their statement and by Thamesbank in theirs. One key objective, Regents Network said, would be "...to establish a "buffer zone" along the waterways...", and Thamesbank referred to "bluefield" sites which would prioritise river needs. Since these ideas have not been proposed as part of the FALP, and would obviously affect the interests of many people, we do not think we could in any event recommend them. Much more detailed work and consultation would be necessary if they were ever to be taken forward.

### *Views*

2.54 Comments were made about the question of views, which are considered in Chapter 4B. The West London River Group asked for three things. They wished to see the word "significant" in the altered paragraph 4.63 (relating to the major landmarks of St Paul's, the Palace of Westminster, and the Tower), replaced by "strategically important". The Mayor promised to think about this, but if he came to any conclusion he did not inform the Panel. We were told that English Heritage also preferred this formulation, though they were not present to confirm this. We suspect that the making of this change (or otherwise) will make little difference to the future of London. On balance we support the change which, as the West London River Group pointed out, reflects the wording in Policy 4B.15.

2.55 They also wanted the second sentence of paragraph 4.123 (in the published Plan), which had been lost along with Policy 4C.21 (see above) to be reinstated. This deals with the importance of views from and across the Thames. The Mayor felt that this was covered elsewhere but did not have a strong view about it. We agree that adding this sentence to paragraph 4.63 would be of value.

2.56 They further advocated that three additional views should be added to Table 4B.2 of the published Plan (p 186), which sets out a list of views designated as part of the View Protection Framework. This table is not altered and therefore adding views is beyond our remit. But we think that the suggestion is quite inappropriate at this stage; the addition of such views to the list, if it were found to be desirable, would have far reaching consequences and affect the interests of many people; again, it would need to be the subject of the fullest consultation and could not be added to the Plan through the route of a Panel Report such as this one.

### **Recommendation 2.9**

We recommend that in paragraph 4.63 the word “significant” is replaced by “strategically important” and that the second sentence of the former paragraph 4.123 (in the published Plan) is added to paragraph 4.63, viz: “The Mayor’s policies for the views framework for London recognise the special value of views from and across the Thames”.

#### *Sub regional Chapter*

2.57 A number of parties, particularly Thamesbank, wished to see greater reference to the BRN in Chapter 5 of the FALP, which deals with the sub regions. Thamesbank set out a series of points on pages 3-4 of BN20. Their main concern is the application of the BRN policies to the Central Activities Zone (CAZ), which is considered in 5G. GOL also supported this view. There is no waterways strategy covering the whole of the CAZ. The Mayor explained that individual Boroughs are carrying out this work but they had not all proceeded at the same pace. He felt that an “overview” might be useful. The River Thames Society said that a fourth strategy was needed for the CAZ area, to go alongside those for the other areas along the Thames.

2.58 We do not go through the details of the points made by Thamesbank in relation to Chapter 5. For the most part we think they are repetitious; we have indicated elsewhere that we do not see the sub regional sections as complete in themselves – they complement the rest of the Plan where necessary but do not duplicate it. If they did so, the Plan would be inordinately long.

2.59 However we do have sympathy with two points. First, Thamesbank wished to see the River and the Thames Policy Area on the sub regional maps in Appendix 1. We agree that this would be helpful. The Forum also wished to see

all waterways, and the flood risk areas on those maps, but we suspect that would be a cartographic impossibility; they should appear on maps – but not on these maps.

2.60 Second we are concerned that there is no strategy for the BRN within the CAZ (described by Thamesbank as a Central River Strategy). This is again a matter of implementation, and essentially beyond the remit of the Plan, but we think it is such an important issue that we should express a view on it.

**Recommendation 2.10**

We recommend that the River and the Thames Policy Area are shown on the sub regional maps in Appendix 1 of the FALP.

We recommend that steps are taken to ensure the production of a single “overview” strategy for the BRN within the CAZ.

---

## Chapter 3 Inter-regional issues

### Introduction

3.1 The Panel, in introducing the supplementary questions for this matter at the EiP, produced a preamble which set out the issues as we saw them. We think it useful to reproduce that preamble, which summarises the key points made in representations and leads into the three questions which we need to consider in this Chapter:

#### *Preamble*

*“The Panel finds itself faced with some difficulties here. As indicated above its remit is only to consider the FALP, and to make recommendations to the Mayor as to changes which might be made to them. Some of the representations on this matter go beyond the FALP and indeed beyond London, in some cases seeming even to wish the Panel to make recommendations about the content of other RSSs. This they will not be doing.*

*There is also some disagreement in the various statements as to the extent of any incompatibility between the FALP and the East of England and South East Plans. The Mayor thinks they are “generally consistent”, and EERA use exactly the same term (though not agreeing with the London-Luton-Bedford corridor - see below). SEERA are less sanguine. Others see major incompatibilities. GOL in para 11 mention “different outlooks” (in relation to the corridors); HA say “the LPFA lacks inter-regional consideration”; Surrey that the Plan “...fails to give adequate recognition of the need to work closely with adjoining Authorities”. Others make similar comments. The FALP in Policy 1.2 (p 5) and in para 5.8 (p 290) and elsewhere makes clear the Mayor’s intention to work more closely with surrounding regions but the Panel are left with a clear impression that there is a long way to go in this regard.*

*GOL say in para 11 of their statement that: “...it would be helpful if the Plan was more explicit about the mechanisms and timeframes for action and to identify what work will be undertaken and by whom”. South London Partnership refer to: “...the absence of clear mechanisms to develop and implement joint planning policies and solutions”; North London Strategic Alliance make a very similar point. Surrey say “inter-regional working is in its infancy”.*

*There is further disagreement about what mechanisms might be appropriate. GOL say that there would “seem to be a need for further joint study of the linkages across the regional boundaries”, and refer in para 19 to the fact that “GO-SE also posited the need to explore whether a Greater South East spatial context is needed that better recognises the inter-dependencies between London and the*

*adjoining Regions”. This echoes a recommendation by the East of England EiP Panel (Rec 3.3 – that there should be an inter-regional review after the RSS has been finalised to establish an inter-regional perspective and base for future RSS reviews). However this recommendation was pretty forcefully rejected by the Secretary of State (p 10 of the Sec of State’s proposed changes to the East of England RSS, Dec 2006).”...inter-regional issues should be dealt with through the RSSs...”.*

*The Inter-Regional Forum (IRF) is proposing a study of these linkages however, and EERA’s statement sets out some of the details of how this is intended to work (subject to a meeting in early June). Not everyone has confidence in the IRF however – Surrey for example say that “the assumption that the Inter-Regional Forum is a sufficient mechanism to co-ordinate work at a more specific corridor level is unproven”. London Councils are not happy with its composition and do not think it can provide sufficient “joined up planning”.*

*In various statements the areas of possible inter-regional conflict are identified. Page 78 of the Secretary of State’s proposed changes to the East of England RSS gives a useful list. The main ones identified in statements on this matter seem to be:*

- *What are seen as low employment forecasts in outer London, compared with higher forecasts beyond the boundary*
- *Relatively higher housing forecasts in outer London but “under-provision” (GOL) beyond*
- *The resulting possible increase in outward (“reverse”) commuting, largely by car in a situation where public transport is unlikely to cope – and consequent effects on the highway network described by HA*
- *The extent to which housing and employment can be “matched” locally – the Mayor expresses doubts about this at para 7 but others say it should be an objective*
- *Lack of clarity as to the roles of town centres on either side of the London boundary*
- *Different car parking standards inside and outside London*
- *The London preference for “corridors”, compared with the concept of “arcs” in the two RSSs; and the whole question of the corridors which are actually proposed in the FALP*

*As indicated earlier, not all of these fall within the remit of the Panel. The housing figures for London were for example recently fixed, in the Early Alterations, and most of the transport policies remain unaltered, though there is likely to be some debate under matter 5 about employment issues in Outer London.*

*GOL remark (para 16) that “it is easy enough to describe the problem, much less clear what the London Plan might do about it”, a comment which gave the Panel little comfort as it prepared for the EiP. But with all this in mind, the view of the*

---

*Panel is that there are three things which can usefully be done through the FALP process:*

*The first is fairly briefly to discuss the issues that raise cross boundary tensions and then to consider more carefully the extent to which the Further Alterations impinge on those issues and whether the Alterations might be improved.*

*The second is to look quite hard at mechanisms.*

*The third is to consider the more specific questions regarding the corridors, on which many parties have commented”.*

### **The cross boundary issues**

3.2 We report fairly briefly on the cross boundary issues. Some Participants wished to go into some detail about them. But our job was not to consider, for example, the housing or transport issues themselves but to consider whether there were in fact problems of consistency across the London boundary and if so what those were.

3.3 It was very clear to us that there are indeed such problems, and that in general the list set out above in the preamble, which was derived from the views expressed in evidence and statements, covered the main points. GOL set out some particularly useful thoughts on pages 4-6 of its statement. TCPA were critical of the level of interaction between the three areas in their evidence, as were London Councils at the EiP. The majority of the Participants at the EiP clearly agreed with these views. The Mayor said that he thought some of the differences between regions may be less than they appeared from the evidence; and the East of England Regional Assembly (EERA) thought that there were not many issues which were inconsistent across boundaries. But these were exceptional views.

3.4 We deal in Chapter 5 with some of the employment issues within London, but London Councils, GOL, Thames Gateway London Partnerships (TGLP), North London Strategic Alliance (NLSA) and the Highways Agency (HA), were among those who raised aspects of this subject during the debate. Several parties referred to housing; and differences in the definition and the level of protection of the Green Belt across the boundary were also mentioned. There was a good deal of discussion about transport issues. The HA was concerned about an alleged lack of consultation and a consequent inability to be certain that transport links across the boundary of London could accommodate the levels of growth being contemplated. TGLP were concerned about differences in rail pricing structures inside and outside London, and the NLSA, London Councils, South East England Regional Assembly (SEERA), South London Partnership (SLP), and TGLP also raised transport concerns. Several parties including the Mayor thought that differential parking regimes across the boundary were a problem – less restrictive regimes outside London meant that employment and retail development may be attracted there. During a later debate there was discussion of the need for logistics



provision to be planned on an inter-regional basis too. The Association of London Borough Planning Officers (ALBPO) also raised the question of waste, though it was acknowledged that a lot of work had been done on this topic.

3.5 We conclude that there are issues which go across the boundaries between London, the East of England and the South East which need to be considered in a comprehensive way. It is perfectly obvious that housing markets, employment locations, and transport links pay no regard to the boundaries, and that there are other topics which we have listed which require a wider view of some kind. In this respect we reach the same conclusion as the East of England Panel in their paragraph 3.20 et seq.<sup>1</sup> The questions which arise are whether present mechanisms are adequate for this task and, if not, what other process might be required. Certainly the process of the three bodies lobbying representations at one another during each EiP is not the optimum method.

### **Mechanisms**

3.6 There is in existence the Inter-Regional Forum (IRF), and they propose a joint study, the terms of reference for which were set out in detail in the EERA statement and appear as BN24B. As indicated in the preamble, there are varying views as to the effectiveness of this body, and these differences became even clearer at the EiP. A number of parties (TCPA for example) suggested that it was under-funded – and we were told that the budget for the proposed study was £30,000. This figure was much derided during the course of the EiP debate. GOL said that the IRF had been in existence since around 2000, and it was not clear to those not directly involved what it had been doing.

3.7 As the Mayor, GOL, and others said, London and the two regions had been concentrating on producing their own strategies, and this had perhaps prevented progress on the wider issues. But GOL felt that there was a need to guard against “parochialism”, that the two Regional Assemblies both seemed hesitant about cross border thinking; that it would have been preferable for some kind of wider study to have been done before now (others agreed with this); and that it was appropriate for us to make a recommendation to deal with this matter. It was worried that the IRF study as described was likely to concentrate on constraints and not on opportunities. The Mayor felt that the study, though very useful, would not deal with all the issues. London Councils were not complimentary about the IRF, though they thought it had done some useful research. Two parties described the IRF as a “black box” – it was not clear what was happening inside it. ALBPO felt that London was looking inwards and needed to take more account of things happening outside its boundaries; but much could be achieved at the local level through inter-authority working on LDFs.

3.8 We were left with the view that what was proposed by the IRF would not be adequate. It seems clear that the proposed funding would be insufficient to

---

<sup>1</sup> East of England Plan, Report of the Panel, 2006. CDL-CG058

carry out the necessary research and the difficult strategic planning work which would need to follow. There did not appear to us to be sufficient support for the IRF approach nor – as GOL suggested – a sufficiently positive approach by the IRF itself to the problem.

3.9 We should at this point, however, mention the views of EERA, which in some respects were not in line with those of most of the other parties. EERA felt that there were not many issues where there were cross boundary inconsistencies. They were optimistic that the IRF study (which they were to lead) would be aware of all the issues and were not clear that more was needed. They felt there would be political resistance to any other proposal, and that there was a good deal of guidance already in place (such as the Sustainable Communities Plan) from the Government. They felt that the best course of action was to build on the IRF work.

3.10 This was not a view which others accepted nor is it one which convinced the Panel. To put it frankly, we detected nervousness of what a more robust inter regional process might lead to, rather than convincing satisfaction with the present arrangements. We feel that something above and beyond that study, with a greater degree of independence is needed. There was a good deal of discussion at the EiP of the form this might take.

3.11 The Mayor and others pointed out that the timing for some kind of review was appropriate. All three Plans had fairly recently been through Examinations and all three Regional Planning Bodies (RPBs) would be in the course of preparing reviews or further Alterations during the next year or two. The timing was never perfect – the East was somewhat ahead of the South East and indeed of London itself in preparing for the next round – but there was a window of opportunity within which some kind of review could be carried out. Though EERA expressed doubt, we agree with the Mayor - the timing is now right for such a review.

3.12 We mentioned the recommendation of the East of England Panel earlier. They proposed (in Recommendation 3.3) that “After the RSS has been finalised, consideration should be given to conducting a broad inter-regional review to help establish a coherent inter-regional perspective and evidence base for future RSS reviews...” (and they made some suggestions as to structure in paragraphs 3.22-23). They discussed this in the context of some form of National Spatial Development Framework and some of the parties at the London EiP (such as the TCPA, who referred to their “Connecting England” report) also advocated this. Like the previous Panel we draw back from this proposition – tempting as it is; it is not something which the Government have yet found necessary. But we believe the evidence that we read and heard in London strongly supported at least their recommendation for an inter-regional review.

3.13 The Secretary of State, surprisingly in our view, did not accept this recommendation (p 10 of her proposed changes to the RSS for the East of

England.<sup>2</sup> She felt that “Inter-regional issues should be dealt with through the RSSs” – an assertion which we find unconvincing (we used the word “baffling” in our first draft but decided to draw back). She placed great faith in the IRF and the English Regions Network, though she did suggest that the effectiveness of those arrangements should be kept under review.

3.14 This does not appear to have been the view of the Government Office for the South East (GO-SE), according to GOL’s statement, at the recent EiP into the RSS for the South East. GOL itself felt that, though inter-regional working through the current planning arrangements was the best way to proceed, we should not be constrained by this previous rejection. The notion of some kind of review, perhaps along the lines suggested by the East of England Panel, was supported by the Mayor, GOL, TCPA, SLP, NLSA and others.

3.15 The Mayor made some suggestions. He proposed some form of independent “Commission” – not on a large scale but a person or group of persons appointed by the IRF, acting in a relatively informal way and advising on the three current Plans and on the context for the next stages. They should look at what the three have in common, what is in conflict, where there are gaps, and what issues the next round of Plans should address. SEERA and (particularly) EERA expressed doubts about the idea of an independent review.

3.16 The Panel do not wish to be prescriptive about the form of any review but we do feel it appropriate to make a strong recommendation to the effect that such a review is necessary. We think it might well be carried out under the auspices of the IRF and build on the work already proposed, but we are attracted by the Mayor’s suggestions regarding independence. We think it should be well resourced, and we think it should be commenced very soon in order to anticipate the next round of Plans in all three locations, and completed before the end of 2008. It is absolutely apparent to us that there *are* cross boundary issues which need to be examined. We consider that the key issues are Climate Change policies across the three regions; housing and employment forecasts inside and beyond the London boundary; transport (including road and rail capacities, cross boundary commuting patterns, pricing structures, and car parking policies); logistics; the relationship between the location of housing and employment and transport links (including the proposed development of “arcs” and “corridors”); the roles of town centres; Green Belt; and waste. There may be others.

3.17 If, as EERA suggested, there proves to be consistency between the three areas, then the RPBs can congratulate themselves and proceed with confidence. But if, as is much more likely, areas of inconsistency are discovered and resolved then the quality of future Plans will be enhanced and the task of future Panels will be reduced.

---

<sup>2</sup> Secretary of State’s Proposed Changes to the Draft Revision to the Regional Spatial Strategy for the East of England and Statement of Reasons, GO-EE, 2006. CDL-CG021

**Recommendation 3.1**

We recommend that, following publication of the London Plan as altered and of the Secretary of State's proposed changes to the South East RSS, work should commence on a broad inter-regional review to be completed before the end of 2008. We recommend that this is arranged under the auspices of the Inter-Regional Forum but that it is carried out by independent persons, properly resourced.

We recommend that their brief should be to review the three Plans for London, the East of England and the South East of England; to identify where they are in concert and where in conflict, taking into account the views we have summarised in this Report; and to establish a coherent inter-regional perspective and evidence base for future reviews.

3.18 After the EiP, and while we were preparing our Report, the Panel Report dealing with the South East RSS<sup>3</sup> was published. That Panel expressed concern, in relation to cross boundary issues, that "...there is little evidence that a serious consideration of this functional inter-connectivity has informed the definition of policies within the Draft Plan..." (paragraph 5.33) and "we wish to add our support to those who argue for a stronger inter-regional policy context for RSS EiPs" (paragraph 5.34). They refer to the IRF but "...have seen little evidence of its effectiveness" (paragraph 27.6). Though they do not make a formal recommendation they do, in the section on implementation, call for joint working between the South East, London and the East of England to identify "...potential inconsistencies and/or omissions between RSSs to improve the evidence base for subsequent reviews..." (paragraph 27.6). They also advocate the synchronisation of the process of future RSS reviews to assist a genuinely joint approach to the planning of the Greater South East; we associate ourselves with that recommendation, though it was not discussed at the London EiP.

**Corridors**

3.19 New Policy 1.3 in the FALP proposed to "...identify and develop the capacity of the two nationally important growth areas [Thames Gateway and London-Stansted-Cambridge-Peterborough] and three other corridors of city region importance [the Western Wedge, the corridor through south London towards Gatwick including the Wandle Valley, and the London-Luton-Bedford corridor] connecting London and the wider City Region". The Mayor suggested changes to this Policy in BN25. It should be noted that GOL supported the concept of corridors, and referred to paragraph 3.10 of Circular 1/2000.<sup>4</sup>

<sup>3</sup> The South East Plan – Report of the Panel, GO-SE, 29 August 2007.

<sup>4</sup> Strategic Planning in London, GOL Circular 1/2000, GOL, 2000. CDL-CG013

3.20 There were three issues which we considered should be debated at the EiP under this heading; the London-Luton-Bedford Corridor, the Wandle Valley Corridor and the two Growth Areas of Thames Gateway/London-Stansted-Cambridge-Peterborough. The Western Wedge was not the subject of substantial strategic concern.

#### *London-Luton-Bedford*

3.21 It was this corridor which raised the greatest level of concern and controversy in evidence and at the EiP, with two different sets of views put before the Panel.

3.22 A number of organisations within London strongly supported the London-Luton-Bedford (LLB) Corridor. Barnet spoke in favour, representing also the views of Brent, Harrow and Camden. London First, London Councils, the NLSA and ALBPO also strongly advocated its retention in the Plan. The statements of Barnet and NLSA set the case out fully and NLSA submitted a series of plans.<sup>5</sup>

3.23 These organisations argued that growth was in fact already taking place along the corridor – though it was not seen as a continuous growth belt but as a series of “nodes or centres of growth” (London First). Against this background, they argued that it was better to recognise and plan for this growth. Within London there were enormous opportunities at places like Kings Cross, Wembley, Cricklewood/Brent Cross, Colindale, Mill Hill and others, and these could benefit people inside and outside London. Very large numbers of jobs were expected to be created right through the London part of the corridor from Camden outwards. Substantial development was anticipated beyond the boundary, for example around the Bedford, Hemel Hempsted, Watford and Luton areas, including around Luton Airport (though there were some doubts as to whether the corridor should extend as far as Bedford). Communication links along the corridor were already excellent (by public and private transport). However they needed improvement – for example by the development of Thameslink - and by planning the corridor as a whole this could be “more successfully secured” (Barnet, statement). At present, although they thought relationships across the boundary were strengthening, there was a lack of a strategic context.

3.24 NLSA said that a growth corridor was “...not something which invites growth but something which reflects growth”. The Mayor said this was about “...the spatial management of areas that are growing or expected to grow”. Several of the Participants stressed that they did not see the proposals as a threat to the Green Belt – in fact the Mayor suggested that there would be a greater threat to the Green Belt if the corridors or growth areas were not identified and planned.

---

<sup>5</sup>North-West London to Luton Corridor, NLSA, nd. CDL-WS065

3.25 A very different set of views was put by EERA, Hertfordshire County Council, Bedfordshire County Council, Watford Borough Council and CPRE. They reflected views put in evidence by other Authorities in the LLB area outside London.

3.26 They argued that the notion should be deleted from the FALP and that it was inappropriate for the Mayor of London to include in his Plan policies which required implementation beyond the boundary. Though there was agreement that growth was taking place in certain areas, there was concern that the transport corridors could not take the levels of growth anticipated. It was inconsistent to highlight this particular corridor and not others where growth was also taking place. LLB was not in the Sustainable Communities Strategy, was not included in the East of England Plan, and was only one of several radial corridors which were subject to pressures. The Secretary of State's response to the East of England RSS did not support the concept (especially paragraph 3.14), preferring a polycentric approach. (Though it should be noted that London Councils thought that Recommendation LA2 sub paragraph (2) of the response supported the concept of the corridor.) The identification of this particular corridor for growth would attract attention and further pressure to it – contrary to the wishes of local people and beyond the capacity of the transport network. Authorities outside London were happy to discuss cross boundary issues with the NLSA or others but considered it was wrong to include the proposal in the FALP.

3.27 CPRE were particularly concerned about possible effects on the Green Belt and predicted that developers would be “rushing in” to develop throughout the corridor if the proposal remained.

3.28 HA argued that a substantial amount of work needed to be done to establish the capacity of the highway network in the corridor before the concept could be taken further. The Mayor considered that transport-led planning was an “old fashioned idea”.

3.29 On these latter two points we take the following views. We do not think the identification of the corridor, if it went ahead, would increase the risk of development in the Green Belt, nor even necessarily the degree of pressure for development in the area as a whole. We accept that the point of proposing to plan the corridor strategically is to enable these pressures to be controlled and directed, and also to enable development to be related to transport capacity. We agree that work needs to be done on the capacity of the highway network though we think the capacity of the public transport network is as important – perhaps more so; but this work should be done in tandem with other work and not in advance of it, if the concept is pursued.

3.30 As to the principle, we find first that it is obviously true that there are major opportunities for growth in this corridor; inside London we saw evidence of this on our Panel tour and it is clear that there will be development outside London too. We agree that the description of a series of growth areas along the

corridor, rather than a continuous corridor, is a more accurate representation of the concept. We also agree that there are clear benefits in cross boundary co-operation in the planning of this series of growth areas.

3.31 The question for us is how this should be done, and whether the proposals in the FALP, as proposed to be amended in BN25, are acceptable. We do have sympathy with the reaction of Authorities outside London to the Mayor's proposals for their areas in the FALP. But the BN25 amendment, which would replace "which need strategic co-ordination" with "The Regional and Local Authorities will jointly examine timescales and mechanisms for the strategic co-ordination of these areas", is a more conciliatory formulation.

3.32 We think this moves in the right direction and we see the development of this concept as being much more akin to the Western Wedge concept (which we were assured was working like a dream) than, for example, one of the Government Growth Areas. But while we understand the reservations of EERA and the others outside London, we were concerned that there was – interwoven with their very cogent arguments – a strand of negativity which could be damaging. While we accept the need to moderate the FALP we would not accept that this proposal should be "kicked into the long grass", as it was put at the EiP. Reference to the IRF for example was seen as being likely to lead to delay. We do think this idea needs to be developed urgently and positively. The pressure of circumstances does not allow for the luxury of lengthy deliberations.

3.33 In order to stress the distinction between LLB and the Government Growth Areas, the Mayor proposed in BN25 to re-title Policy 1.3 "Growth Areas and Development Corridors" (rather than just "Growth Areas"). Later he accepted the term "Co-ordination Corridors" and we think this would better reflect the wish on all sides to see parties working together in these areas (we should note that this affects the Wandle Valley – Gatwick Corridor also). The Policy itself also needs amendment to reflect our recommendations. We think the two concepts could be further distinguished by splitting paragraph 1.23, which describes the two growth areas and the three corridors, into two separate paragraphs.

3.34 We therefore make several recommendations on the FALP themselves.

**Recommendation 3.2**

We recommend first that Policy 1.3 should be re-titled "Growth Areas and Co-ordination Corridors".

Second we recommend that Policy 1.3 should be amended to read: "...to identify and develop the linkages and capacity of the two nationally important growth areas and to develop timescales and mechanisms for the co-ordination of the three other areas of city region importance...".

Third we recommend that paragraph 1.23 should be split into two paragraphs, the first dealing with the growth areas and the second with the co-ordination corridors.

Fourth we recommend that the final bullet point of paragraph 1.23 dealing with the London-Luton-Bedford Corridor should be amended as proposed in BN25: delete "...which need strategic co-ordination" and replace with "The Regional and Local Authorities will jointly examine timescales and mechanisms for the strategic co-ordination of these areas".

3.35 We then make recommendations about the process, though the precise mechanisms are not a matter for us. As we have said, we do not wish to see this matter delayed or deferred; we think it could and should proceed in advance of the inter-regional review which we recommended earlier, and that the Western Wedge arrangements should be used as a model. The aims of the co-ordination will be to maximise the opportunities presented by potential development areas in the corridor, with the aim of meeting the needs of populations throughout the area, making best use of infrastructure (particularly the potential of the public transport links), and protecting valuable open land.

**Recommendation 3.3**

We recommend that with some urgency, and certainly before the end of 2008, arrangements are established between Authorities and Agencies on both sides of the London boundary to co-ordinate the planning of the London-Luton-Bedford Corridor. Such arrangements should operate within the context of, but separate from, the inter-regional review recommended above.

3.36 There are two final points on LLB. First the Key Diagram refers to the "M1 Corridor"; this is plainly wrong and should be amended. Second there is the question of whether the corridor should extend as far as Bedford. We find this impossible to determine – it affects areas outside our remit and should be resolved through the mechanism we have described. For what it is worth, the evidence which was before us did not convince us that it should extend so far, but we leave that for others to determine.

**Recommendation 3.4**

We recommend that the Key Diagram is amended to refer to the London-Luton-Bedford Corridor.

*Wandle Valley-Gatwick Corridor*

3.37 Unlike LLB, the concept of this corridor was included in the 2004 London Plan and the relevant sub paragraph remained unaltered in the FALP (though it



had now become subsidiary to Policy 1.3 – a change from the previous position). It is not, however, specifically included in the South East Plan (SEERA statement p 2). The recommendations we have made regarding the new Policy 1.3 and paragraph 1.23 all affect the context in which that sub paragraph sits, and are likely to reduce the concern of those who argued that this corridor should not be seen in the same light as the Government Growth Areas.

3.38 There was a general consensus that cross boundary co-ordination is needed for this corridor. SEERA indicated that they had welcomed the reference in text of the 2004 Plan, but objected to the proposed new Policy statement in 1.3. The corridor was heavily constrained by Green Belt and also by the capacity of the transport infrastructure. It was an area with complex living and working patterns. They did not wish to see it extend as far as Brighton (as Policy 5E.1 suggested). They were happy “...to further explore the linkages, development opportunities and infrastructure needs along this corridor whilst at the same time seeking to maintain and enhance the areas protected by important policy and environmental designations...” (statement, paragraph 14).

3.39 London Councils made broadly similar points. There were great opportunities for development for employment within London itself, along the Wandle Valley. SLP described it as a “green corridor” rather than a growth corridor but agreed with the need for collaboration.

3.40 We do not make a specific recommendation about the arrangements for this corridor because we were told that collaboration was generally supported by all concerned; we urge a proactive approach to the resolution of cross boundary issues. We note that Surrey County Council felt that the assumption that the IRF was a sufficient mechanism to carry out work at a specific corridor level was unproven (statement paragraph 9) and we would anticipate that specific arrangements for this collaborative work would need to be set up along broadly similar lines to those for the Western Wedge and those we propose for the LLB Corridor.

3.41 Policy 5E.1 came in for some criticism; London Councils argued that its intention to “...support the strategic development of the growth corridor from Croydon through Gatwick to Brighton and collaborate with SEERA, SEEDA, and Local Authorities...” did not accord with Policy 1.2, which, even in its unamended FALP formulation, was more about “engagement”.

3.42 In our view the changes we have already proposed to Policy 1.3 assist in clarifying the role of this corridor but we do accept (as did the Mayor at the EiP) that Policy 5E.1 needs amendment.

### **Recommendation 3.5**

We recommend that the final bullet point of Policy 5E.1 is amended to read “support the strategic co-ordination of the corridor from Croydon to

Gatwick and collaborate with SEERA, SEEDA and Local Authorities in the corridor"; for the avoidance of doubt this means that the reference to Brighton would be omitted.

*Thames Gateway and London-Stansted-Cambridge-Peterborough*

3.43 We asked at the EiP whether there were any inconsistencies between the London Plan and these two Government Growth Areas, and whether we should recommend any changes. What emerged from the debate was a very considerable level of concern about the co-ordination mechanisms for both Growth Areas. We understand from GOL (statement paragraph 6) that similar concerns were expressed at the other two EiPs. The areas are of course different, with the Thames Gateway having been in existence for a longer period, but in each case a series of Participants expressed the view that better planning and co-ordination were needed. The IRF Study was not seen by the majority as the place where this could happen. Authorities and Agencies were working together but much more was needed.

3.44 However, there were few suggestions as to how the FALP could assist with this. GOL and others broadly supported the Mayor's approach. He set out some views in BN26 and we broadly agree with those conclusions. Our view is that there are no inconsistencies at a strategic planning policy level, and that the FALP are not the right place to sort out the issue of administration. It is important, some very good points about the current inadequacies were made, and better mechanisms are needed. But the bulk of the areas concerned are outside London, and we think that it is for the Government – whose Growth Strategy this is – to set about establishing effective arrangements. In relation to the Thames Gateway we discuss in Chapter 5 the need for the area to be planned and marketed as a whole.

3.45 There were points of detail about paragraphs 6.50 and 6.50i. A sentence had been proposed for deletion: "Lastly, there are mechanisms emerging to support work on the London-Stansted-Cambridge growth area". Some parties wished to see this re-instated. We think it makes little difference in practice but an acknowledgement of the Growth Area at this point in the Plan (dealing with implementation) would perhaps be appropriate (adding a reference to Peterborough to update the description). There was a call for Transport for London to be added to the list in 6.50i of the bodies involved in collaborating on cross boundary issues, and this also seems appropriate.

**Recommendation 3.6**

We recommend that the sentence at the end of paragraph 6.50 which was proposed for deletion is re-instated – viz "Lastly there are mechanisms emerging to support work on the London-Stansted-Cambridge-Peterborough Corridor"; and that a reference to Transport for London is included in the opening section of paragraph 6.50i.

## Chapter 4 Sub Regional Structure

### Introduction

4.1 In this chapter we look at the sub regional structure proposed in the FALP. Policies relating to designated locations are considered in Chapter 5, on a topic rather than sub regional basis. This is because the substance of a policy for a location, such as a particular town centre, Opportunity Area (OA) or what have you, does not hinge on the sub region where it happens to lie. Different sub regions would not of themselves create new policies and proposals, nor alter existing ones, but simply reallocate them within new boundaries.

4.2 The questions we look at here are first the process changes intended by the Mayor, in particular with respect to Sub Regional Development Frameworks (SRDFs) and, with this in mind, we then look at the value of sub regions in principle and the comparative effectiveness offered by different boundaries to take matters forward on the ground.

### Background

4.3 Attempts to introduce sub regional structures to the planning of London pre-date the Mayor's office and the London Plan. For present purposes, however, the starting point is the sub regional structure in the London Plan 2004. In order to make timely progress on that Plan as a whole, the Mayor had pragmatically adopted and incorporated sub regions already defined and used by the Learning and Skills Council.

4.4 This approach was given qualified endorsement by the Panel who examined a draft of the Plan.<sup>1</sup> They recorded that there had been practically no dispute regarding the principle of having sub regional frameworks; that the Central Sub Region, and its relationship to the Central Activities Zone (CAZ) and City, was the most controversial; and they laid reliance on 'permeability' to address issues transcending boundaries.

#### *The existing sub regions*

4.5 The resulting existing sub regional structure covers the whole of London and comprises five groupings of entire Boroughs (with none split across sub regions).

- **Central** (spanning the Thames): Camden, Islington, Westminster, Kensington & Chelsea, Wandsworth, Lambeth and Southwark.

---

<sup>1</sup> Draft London Plan. Examination in Public. Panel Report, 2003, paragraphs 3.1-3.9. CDL-LW094

- **West:** Hillingdon, Harrow, Ealing, Hounslow, Brent and Hammersmith & Fulham.
- **South:** Richmond upon Thames, Kingston upon Thames, Merton, Sutton, Croydon and Bromley.
- **East** (spanning the Thames): Hackney, City, Tower Hamlets, Lewisham, Newham, Greenwich, Redbridge, Barking & Dagenham, Bexley and Havering.
- **North:** Barnet, Enfield, Haringey and Waltham Forest.

4.6 The 2004 Plan incorporates also the long standing concept of a CAZ at the heart of London and (in that Plan) mainly encompassed within its Central Sub Region other than the Zone’s eastern extremity taking in the City at the western limit of the East Sub Region.



*Fig 4.1 Existing London Plan Sub Regions*<sup>2</sup>

4.7 Following public consultation, in May 2006 the Mayor published Sub Regional Development Frameworks (SRDFs)<sup>3</sup> for each of the five existing sub regions. His foreword to each advised that: “Public consultation on Further Alterations to the London Plan will follow later during 2006. In those Alterations I will be proposing changes to the structure of London’s sub regions. However, the information and data contained in this SRDF remains valuable and will form a part of any updated SRDFs”.

<sup>2</sup> Reproduced from Review of London’s Sub Regional Structures, Addison and Associates for Mayor of London, 2006, p 64. CDL-LW088

<sup>3</sup> Sub-Regional Development Frameworks, Mayor of London, 2006. CDL-LW053-057

4.8 When asked in person at our opening session about the underlying reason for the FALP changes, the Mayor put his position succinctly: “We got it wrong the first time”.

4.9 Several options were assessed in a Review of London’s Sub Regional Boundaries by Addison & Associates.<sup>4</sup> Option A in that Review is the existing London Plan structure (Fig 4.1 above); Option C (Fig 4.2 below) has been taken forward in the Draft Further Alterations.

#### *The FALP sub regions*

4.10 These continue to cover the whole of London in five, revised, groupings of entire Boroughs.

- **North West:** Hillingdon, Harrow, Ealing, Hounslow, Brent, Hammersmith & Fulham and Kensington & Chelsea.
- **South West:** Richmond upon Thames, Kingston upon Thames, Wandsworth, Merton, Sutton, Lambeth and Croydon.
- **South East:** Southwark, Lewisham, Greenwich, Bromley and Bexley.
- **North East:** City, Tower Hamlets, Waltham Forest, Newham, Redbridge, Barking & Dagenham and Havering.
- **North:** Barnet, Enfield, Haringey, Westminster, Camden, Islington and Hackney.



Fig 4.2 Further Alterations to the London Plan Proposed Sub regions<sup>5</sup>

<sup>4</sup> Review of London’s Sub Regional Structures, Addison and Associates for Mayor of London, 2006. CDL-LW088

<sup>5</sup> Reproduced from Review of London’s Sub Regional Structures, Addison and Associates for Mayor of London, 2006, p 64. CDL-LW088

4.11 A draft revised, enlarged, CAZ, would to varying extents overlay the innermost areas of each of these sub regions and is considered in more detail in Chapter 5 below.

### **The Scope of the Examination**

4.12 At the Examination, the Mayor questioned whether the principle of having a sub regional structure falls within the remit of the FALP – this having been established in the statutory 2004 Plan – and also suggested that any choice could lie only between the existing and draft options as described and illustrated above.

4.13 We recognise the strength of these points, but consider that the Mayor’s actions in proposing a substantially new structure at such an early stage in the Plan’s existence, and so very shortly following publication of SRDFs based on the existing structure, must at least implicitly raise a question mark about the approach as well as the detail.

4.14 Somewhat similarly, we also take the view that it was right to expose further specific options for comment, in particular those others (Options B, D & E) considered in the Addison Review. In the event, however, no one actively promoted any of these, or indeed any further option, and none struck us as being self evidently superior to the options set out above.

4.15 So the issue resolves itself to two main considerations: the principle of having any permanent sub regional structure, and if so the practical choice is between the 2004 Plan and FALP option.

4.16 Before turning to these considerations, however, we must first look at some important detailed changes envisaged for the SRDFs with regard to their processes and subject matter. These changes arose or were clarified following publication of the FALP and are important both to the principle of whether to retain sub regions and to a choice of boundaries.

### **Process and Content Changes**

#### *Sub regional implementation frameworks?*

4.17 New frameworks would be prepared covering each of the FALP sub regions, but as clarified during the EiP process the Mayor now envisages that these be titled Sub Regional Implementation Frameworks (SRIFs) in place of the existing SRDFs. This change of emphasis was widely welcomed even amongst those who otherwise remained opposed to the principle of sub regions. As set out by the Mayor (BN26B), the SRIFs would not be intended to fill in strategic policy gaps that might emerge during their preparation, though the work could inform future reviews of the London Plan. The Mayor intended that each SRIF would contain specific points related to implementation within that sub region and distinguish between those related to its inner and outer areas. The SRIFs would

signpost rather than duplicate more detailed proposals for London Plan designated growth localities such as Opportunity Areas and Town Centres.

4.18 We commend this approach. A recurring criticism, with which we concur, was that the existing SRDFs are too uniform one with another, and that they duplicate and overlay matters in the London Plan or which are more appropriately included in LDDs or other more localised framework documents.

4.19 The Mayor was also considering the extent to which the Frameworks could be structured to follow chapters in the London Plan, to clarify the link between the Plan and its implementation. The new documents would also incorporate the London Development Agency's (LDA's) Sub Regional Economic Development Implementation Plans and Sub Regional Transport Network Plans prepared by Transport for London (TfL). As described to us, the Mayor envisaged that, unlike the existing SRDFs, the new SRIFs could be in electronic rather than paper based format, capable of frequent revision and updating with publicly shared web site accessibility.

4.20 As with the existing SRDFs, the new SRIFs would not be a statutory component of the London Plan but an informal material consideration in the preparation of LDDs and in individual development control decisions. The Mayor has undertaken to draft the Frameworks in close collaboration with the Boroughs and other relevant partners, including both informal initial scoping and more formally during the actual drafting. Again this was welcomed in responses. Subject to the findings of our report, this process would be carried out during the first half of 2008 with a view to final publication early in the following year.

#### *CAZ planning framework*

4.21 Although not a sub region, the CAZ would be subject to a Planning Framework, with each of the SRIFs signposting but not detailing its CAZ components. The CAZ Framework is intended to give additional guidance, as SPG, on FALP Chapter 5G. As intended SPG, its drafting would follow a more formal procedure for drafting and consultation, but in parallel with work on the SRIFs so that each could inform the other.

4.22 Again we commend this approach. There is nothing novel about SPG addressing a set of issues spanning planning boundaries, while the more weight that may be accorded to SPG, which has been subject to public consultation, would underscore the Zone's importance and the Mayor's commitment to it.

4.23 As a small but not unimportant corollary we also endorse a change prompted by GOL and agreed by the Mayor (BN66) to change the second paragraph of FALP Policy 5A.1 regarding the way the SRIFs and the CAZ Planning Framework should be taken forward by the Boroughs.

### **Recommendation 4.1**

We recommend that references to SRDFs in the FALP should be amended to SRIFs, following the processes outlined above, with commensurate change to their emphasis and content, and relevant changes to the London Plan Glossary.

### **Recommendation 4.2**

We recommend that the second paragraph of FALP Policy 5A.1 be modified to read: "Boroughs should use the Implementation Points from these Frameworks [ie SRIFs and CAZ Planning Framework] and Plans to inform their DPDs and development control decisions."

#### *National growth areas*

4.24 The Mayor looked to the Government for further guidance on its nationally designated Growth Areas, including an indication of the extent to which arrangements for the Thames Gateway are to be emulated elsewhere. We commented on this in Chapter 3 and also made proposals regarding the need for consideration of inter-regional cross boundary issues.

### **Principle of a Sub Regional Structure**

4.25 All concerned recognised the need for working at an intermediate scale between that of individual Boroughs and London as a whole. However, the Association of London Borough Planning Officers (ALBPO) said that little use is being made of the existing SRDFs and a number of participants questioned the value of full coverage of London by permanent sub regions comprising entire Boroughs. They questioned whether the approach in London met that envisaged in PPS11<sup>6</sup>, in particular at paragraphs 1.13 – 1.14, and were sceptical too about the extent to which permeable inter sub regional working occurs in practice. They pointed instead to a variety of cross Borough collaborative *activities* pragmatically aligned, for example, with waste management groups, national growth corridors, river partnerships, the Olympics and Paralympics area or other initiatives spanning Borough boundaries.

4.26 While acknowledging shortcomings in the existing sub regional boundaries, the Mayor and others saw such ad hoc collaborative activities, important though they are, as complementing rather than displacing a need for comprehensive sub regions.

4.27 We note first that as PPS11 does not apply to London it would be inappropriate to use its specific guidance as a basis for opposing (or indeed

---

<sup>6</sup> Planning Policy Statement 11: Regional Spatial Strategies, ODPM, 2004. CDL-CG039



supporting) the approach to be taken in London. The Mayor has confirmed, and underscored by his move towards Implementation Frameworks, that the Sub regions are not intended to address strategic policy deficits and neither does London lend itself to a concept, as usually understood, of functionally linked but geographically separate settlements. However, as PPS11 goes on to note: “what might be an effective sub regional approach in one region may not necessarily suit the circumstances and geography of another”. GOL Circular 1/2000<sup>7</sup>, which has direct application, confirms (paragraph 2.13) that the London Plan “may make different provision for different cases or for different parts of London.”

4.28 London is unique, quite unlike any other English region; its approach to sub regional working needs to be assessed on its own terms. We have considered all the points of view put to us, including those regarding the existing SRDFs, and overall concluded that there remains a cogent case for the principle of sub regions. In part, it is a question of breaking down somewhere the size and complexity of London into more manageable component areas, for policy dissemination, data monitoring and the practicalities of communicating with a wide variety of stakeholders. For these purposes the boundaries are less crucial than longevity in the arrangements, so that individuals and organisations build up networks and also acquire shared knowledge and understanding of complex interlocking issues.

4.29 But we also see clear potential benefits, provided that the boundaries are well chosen, from aggregating areas of London to progress and implement locational policies in the Plan. Many of these are wider in application than single Boroughs, and they serve little purpose unless effectively taken forward on the ground. By way of example, FALP Table 5A.1 sets out indicative forecasts of population, household and employment growth by sub regions; as Westminster pointed out, these aggregated totals could be redistributed across any set of sub regions. But that is so wherever sub regions are used for distributional purposes, in the manner referred to in PPS11 paragraph 1.14. It is not an argument against sub regions but for choosing optimum boundaries for implementation.

4.30 The Mayor has a range of implementation routes ranging from the direct use of his own powers in certain cases; through the policies and programmes of agencies within his own group; through the requirement for Borough LDDs to be in general conformity with the London Plan; and through influence and lobbying. It is not difficult to see how these routes could be assisted through effective sub regional working, which notwithstanding the current scepticism of at least some Boroughs, appears generally welcomed by a wide range of business, community and voluntary interests. Interestingly, during the EiP session we discerned that a number of participants who were arguing against the principle of sub regions tended during the debate to move towards promoting the need for *better* sub regional guidance rather than none.

4.31 This support in principle for sub regions could only be strengthened by aligning operational sub regions of agencies such as TfL, the LDA and the Housing Corporation (and the Mayor’s housing functions) with those of the

---

<sup>7</sup> Strategic Planning in London. GOL Circular 1/2000, GOL, 2000. CDL-CG013

London Plan so far as this is practicable. Doing so would widen the concept of the governance of London within a context set by spatial planning. Subject to one nagging doubt, we particularly commend the concept of an electronic master copy, as a dynamic ‘living document’ shared by all rather than physically distributed. This would facilitate incremental revision as matters in the Framework were progressed or circumstances changed in other ways.

4.32 As an aside, our small doubt centres on the risk that SRIFs that are available to be called upon, rather than actively distributed, may lack influence with those stakeholders who were unenthusiastic about them from the outset. This process detail is not within our remit to make a formal recommendation; however the Mayor may wish to consider augmenting any centrally held electronic SRIF with some form of active notification of updates to stakeholders and prompts for action.

4.33 Returning to the main principles, we have no doubt that, in London, the component units of each such sub region should continue to be complete Boroughs, which as local planning authorities have major responsibilities for implementing the London Plan via their LDDs, in their own detailed proposals for Opportunity Areas, Town Centres and other designated locations, and in individual development control decisions. No one, whether supporting or opposing the principle of sub regions, was willing to suggest permanent boundaries that split Boroughs.

4.34 Nor, again in the particular circumstance of London, can we see any basis for other than complete coverage of London by the sub regions. Although varying greatly in character, London is contiguous with innumerable interlocking complex relationships spanning its extent. Some areas are subject to more immediate development opportunities and pressures than others, but there is no obvious part of London that could logically be excluded from the sub regional arrangements, not least from stakeholder partnerships.

#### **Recommendation 4.3**

We endorse the retention of a sub regional structure based on entire Boroughs and including the whole of London.

#### **Comparison of the Options**

4.35 All concerned agreed that there is no ideal arrangement; both options have shortcomings, and some ‘permeability’ across boundaries is inevitable. The question is whether the proposed boundaries are better than the existing ones and if so, would these benefits be sufficient to outweigh inevitable upheaval during a transition from the one to the other.

##### *The Addison assessment criteria*

4.36 The Addison & Associates Review used eight comparison evaluation criteria, on which we invited views at the EiP. Those views were mixed, and

Thames Gateway London Partnership (TGLP) and West London Partnership (WLP) in particular argued that the Review analysis should have accorded relative weightings to each criterion.

4.37 We have taken account of all the views. We agree that some weighting is desirable, but not an attempt at arithmetical scoring. This would need to assign values both to the importance of each criterion and to the degree to which a set of boundaries complied or conflicted with it. This would impart a spurious precision to what at root would remain a judgemental process.

4.38 As will become evident below we disagree with the assumption in the Addison criterion (a) that splitting the CAZ between sub regions should be treated as undesirable, although we accept that some positive weight should be given to minimising the splitting of growth corridors. In line with criteria (b), (c) and (d) we also accept that minimising the sub-division of OAs and Areas for Intensification (AIs), key transport routes and their catchments, and river/stream catchments would all be potential plus factors.

4.39 We can see too, in line with criterion (e) that increased ‘self sufficiency’ within each sub region might be desirable, but we recognise that in practice, in London, such things as housing need and supply, waste disposal and the like are unlikely to align neatly with any sub regional structure. ALBPO described this criterion as very confusing; we found it understandable but impracticable, and do not accord it weight, the more so in the light of the Mayor’s intention to move the sub regional emphasis away from policy making towards taking forward and implementing policies already in the Plan.

4.40 Criterion (f) seeks the maximum degree of alignment of sub regional boundaries with those of other agencies. We approach this from the other direction. The London Plan is the overarching strategic document and we look to the extent to which its chosen sub regions facilitate other agencies to align their substructures with those in the Plan.

4.41 Criterion (g) seeks the maximum degree of alignment between the sub regions and existing sub regional partnerships. We have not accorded weight to this aim, since it would always favour the status quo. The options should be compared first on their respective merits. Inasmuch as this points to a case for change, we will then assess the transitional implications prior to reaching an overall conclusion.

4.42 Finally we accord little weight to criterion (h). Aside from those actively involved, we think few London citizens will have, or need aspire to, a sense of sub regional identity reflecting the London Plan. Few would disagree that many Londoners have a general affinity with north or south of the Thames but beyond that tend to associate mostly with their own named locality, at most a Borough, but certainly not with administrative sub regions. The document, *Outer London: Issues for the London Plan*<sup>8</sup>, points to evidence for suburban residents’ attachment to their own local area (paragraph 1.1) and this is surely no less true for inner

---

<sup>8</sup> *Outer London: Issues for the London Plan*, Mayor of London, 2007. CDL-LW082

London residents. We note that in practice criterion (h) was not used in the Review's comparison tables.

4.43 We add one further criterion: the extent to which the sub regional structure helps facilitate working with adjacent regions bordering London. And we start with a more general comparison of the shape and disposition of the 2004 and FALP sub regions.

### **Panel's Comparative Assessment of the 2004 and FALP Sub Regional Boundaries**

#### *Preliminary overview*

4.44 It has, we believe, become apparent that the 2004 boundaries include basic flaws. First is the anomalous Central Sub Region. This part of London is not homogenous in character, so as to justify its own sub regionally based policy framework. It includes both central and inner London characteristics. We heard several examples of tensions at the margins between the two – and discuss these in Chapter 5 – but there is no evident reason why they need be addressed within the same sub region. Issues, for example, in the vicinity of Kings Cross stand quite separate from those at Elephant and Castle.

4.45 Nor, within the limits of its own boundaries, does the Central Sub Region exhibit such strong functional linkages as to require a permanent sub regional organisational structure to address them. Quite the reverse. There is abundant evidence that London's dominant functional corridors are radial to and from the CAZ, as a work destination for commuters and as a central place for leisure, communications, culture, services, higher education and politics. The effect of the present sub regional structure is in large measure to separate the outer sub regions from the centre; the structure has a tendency to underscore an image of outer London as 'isolated' from the centre and in competition with it for resources.

4.46 As noted in our introduction to this present Chapter, the sub regional structure is not a determinant of London Plan policy but a vehicle for taking it forward. Inevitably, however, any chosen structure will provide a platform for debating priorities and resource allocations. We look at policies for outer London in Chapter 5, where broadly speaking we recognise that the Mayor's agencies are continuing to direct substantial and appropriately targeted resources across a range of policy areas. Also, that the most beneficial transport investment should continue to be focussed predominantly on radial rather than orbital movement. This being so, we consider that the FALP sub regional boundaries would provide outer London stakeholders with a better platform from which to promote their interests than does the existing 2004 Plan structure.

4.47 There is no case for each sub region to be the same size, which would in any event be wholly impracticable, but the present boundaries give rise to undesirably large variations. Of the four outer sub regions, North is much the smallest, only marginally having sufficient critical mass to warrant an existence standing between London as a whole and its individual Boroughs. Conversely

East Sub Region is both very much more extensive and lies either side of a length of the Thames where there are relatively few crossings compared with further upriver. This must add practical difficulties for stakeholders to meet and to focus on matters of shared interest. South Sub Region is both extensive and the most 'isolated' geographically from London's core.

4.48 Conversely the FALP boundaries eliminate the Central anomaly and create five radial sub regions ('pizza slices') roughly of similar size and meeting within the CAZ, which would overlay the innermost parts of each of these new sub regions. It would do so by varying amounts, the FALP North Sub Region taking the largest proportion, but even so it is not difficult to foresee stakeholders in each sub region developing an interest in, and shared ownership of, the well being of the CAZ and how this in turn would assist the outer parts of their sub region. This would be in line with the aims of GOL Circular 1/2000 paragraph 3.29.

#### *Growth Corridors*

4.49 We make various proposals regarding the 'growth corridors' in Chapter 3, but we consider here their relationship to the sub regions within London. Of the Government's Growth Areas, the London Thames Gateway would be split in the FALP proposals (with minor adjustments also in Hackney and Waltham Forest) and a key element of the Plan's spatial strategy for development is to give priority to the regeneration of north-east and south-east London. Without doubt this division weighs against the FALP boundaries. That said, the delivery agencies for the Gateway as a whole already operate either side of the Thames and we see no barrier to continued joint promotional activities across the river for the London end. Detailed modifications to the FALP in this regard are considered below.

4.50 Neither the existing nor proposed boundaries fully encompass the London end of the London-Stansted-Cambridge-Peterborough Corridor within a single sub region but there would perhaps be a slightly better alignment with the FALP North East Sub Region than the existing split across the North and East Sub Regions.

4.51 Of the remaining Co-ordination Corridors, or Development Corridors (see Chapter 3) the Western Wedge and Wandle Valley would each become located exclusively within single sub regions, though any benefits would be modest since it is currently only the innermost areas that extend to small degrees into the Central Sub Region. The FALP key diagram implies that, if confirmed, the London end of a London-Luton-Bedford Corridor would be exclusively within the FALP North Sub Region, however it seems clear that in practice its influence would spread over into Harrow and Brent in the FALP North West Sub Region.

4.52 Overall as regards the 'corridors', we see a balance of advantage to the existing boundaries. This conclusion is tempered by the thought that the London Plan does not 'lead' on the nationally designated corridors.

*Opportunity Areas/Areas for Intensification*

4.53 Of the OAs, most would as now sit within a single sub region (a number entirely within individual Boroughs). But the Upper Lea Valley would be split to a much greater degree than now – between the FALP North and North East Sub Regions, whereas currently only a small part lies outside the existing North Sub Region, where the OA extends into Hackney within the East Sub Region. The Lower Lea Valley OA would also become split to a small degree, where it extends into Hackney, but most would remain in the new North East Sub Region.

4.54 There would be only limited impact as regards the Olympics and Paralympics. In each of the options one of the four most directly affected Boroughs lies in a different sub region from the other three. Waltham Forest at present and Hackney with the FALP boundaries. In any event, working arrangements for the Games are now well established and an obvious candidate for ‘permeable’ working across sub regions.

4.55 But the Upper Lea Valley is a sizeable and important long term OA so on this comparison the existing sub regional boundaries offer a clear advantage.

4.56 Most Afls sit entirely within a Borough and would not be split between sub regions in either option. The single exception is South Wimbledon/Colliers Wood, which would cease to be split but the extent of the current split is small and in the round there is no significant advantage as regards Afls in either option.

4.57 Taken together therefore, consideration of the OAs and Afls supports retention of the existing 2004 boundaries.

*Key transport routes*

4.58 London’s rail and strategic road networks are complex and pay little regard to Borough boundaries. Unsurprisingly, neither sub regional option aligns well with transport routes as such. Any assessment has to look at the bigger picture of travel patterns in London.

4.59 We heard conflicting evidence as to how many commuters travel between their home and work within any particular FALP sub region: for example the number of commuters to Westminster from further out in the same FALP North Sub Region compared with the number, say, from Bromley in the FALP South East Sub Region. But we think that this misses an important point. There is no doubt that the dominant movements are radial, to and from the CAZ, so that stakeholders in each FALP sub region would have an interest extending from their own sub region’s outermost to innermost areas combined with interests across the CAZ shared with all the other sub regions.

4.60 Main line rail termini, for example, are mostly in the 2004 Central Sub Region and would be fragmented between FALP sub regions; but the key here is that all would be within the enlarged CAZ overlaying the innermost areas of each

radial sub region. As and when the termini needed to be considered on more than an individual basis, there would be a mechanism for doing so.

4.61 Conversely the 2004 structure, with a separate Central Sub Region, inherently must split a high proportion of radial journeys, making them less amenable to sub regional consideration.

4.62 The extended congestion charge zone lies mainly though not entirely within the existing Central Sub Region. It would be fragmented by the FALP boundaries. However, we accord little weight to this comparison since the extended zone is fully operational and not a proposal warranting sub regional consideration. And it would be purely fortuitous if any future, further extension aligned well with either set of sub regional boundaries.

4.63 In all we consider that the FALP boundaries would much better align with patterns of movement than do those in the 2004 Plan.

#### *River catchments*

4.64 The 2004 Plan boundaries span the Thames for much of its London reach, which might beneficially help counter any tendency to treat the river as an edge rather than an integral part of those sub regions. However, the FALP boundaries offer rather better alignments with river catchments feeding into the Thames. Overall there is little to choose between the two options in these regards.

#### *Alignment with other London agencies' sub regional boundaries*

4.65 We noted above the benefits stemming from aligning other agencies' sub regions with those of the Plan and consider that this would be more readily achieved with the FALP boundaries, because of the present wide variation in the size of sub regions and lack of synergy with main travel movements. The Mayor has indicated his intention for TfL and LDA sub boundaries to align with those in the FALP, and those of the Housing Corporation (and the Mayor's housing functions) already do so. Transport, housing and the range of complementary measures such as investment and skills training undertaken by the LDA are crucial to the Plan's objectives. The opportunity afforded by the FALP boundaries to align these other agencies' sub regions with those of the Plan is a significant consideration in its favour.

#### *Boundaries with adjacent regions*

4.66 We look in Chapter 3 more broadly at cross boundary issues between London and its adjacent regions. Suffice it here to say that the existing London East and West Sub Regions have outer boundaries split between the East of England and South East England Regions and, crucially, the London Central Sub Region has no geographic boundary with either, though plainly many functional links with both. The FALP boundaries would be more straightforward in that only

the North West Sub Region would have a divided boundary, the unavoidable minimum in any grouping of Boroughs since Hillingdon borders both adjacent regions. And each sub region would span from the CAZ out to its regional boundary, as would associated sub regional stakeholder partnerships. We conclude in Chapter 3 that more robust arrangements are called for to address issues transcending the outer London boundary and consider that the FALP sub regions would assist better than do the existing ones.

### *Conclusion*

4.67 Taking all these considerations together, we conclude that – notwithstanding some disadvantages – the combination of FALP radial sub-regions meeting within an overlying enlarged CAZ offers a better ‘fit’ for London’s strategic needs than the 2004 Plan boundaries and has the makings of a more coherent and enduring sub regional structure. This leaves the question of whether the ‘cost of change’ would be warranted by the potential benefits.

### **Transitional Implications**

4.68 There is no dispute that changing the sub regional structure could not be achieved without upheaval. The sub regions would not need to start entirely from scratch and would without doubt make use of much of the work already invested in the existing SRDFs. Even so, the effort required to disaggregate information from the existing sub regions and reassemble it should not be underestimated. And it would be too optimistic to assume solely a transfer and realignment of existing work: it may well prove impossible, for example, to reassign all data sets prepared specifically for existing sub regions. If so then new basic research may well be called for, aligned to the new sub regions.

4.69 As well as the mechanical process of realigning and updating data, policies and proposals, there would be organisational, human, implications. As things stand, it seems clear that sub regional working is welcomed more by business, community and voluntary sector stakeholders than by at least some of the Boroughs. Indeed, we were concerned by some (by no means all) Boroughs’ negative or uninterested approach. We are unclear whether this manifested some inability to adjust to working with an executive Mayor, who has responsibility for strategic planning, or whether it resulted from disillusionment with the sub regional work carried out to date. Perhaps something of each. Whatever the reason, Borough engagement is vital to translating the London Plan’s strategy into action, via any sub regional structure. Time and better sub regional boundaries may help.

4.70 Be this as it may, it is plain that as a whole the existing individual sub regional partnerships are developing active, positive roles in their respective parts of London, roles that go beyond inputs to the SRDF process but include such things as research, promotion and forging business, local authority and community links. We were impressed by the partnerships. Our criticism of sub regional



boundaries does not in any sense extend to the partnerships that have been defined by these boundaries.

4.71 Setting up new boundaries could, at the very least, be dispiriting to those who have worked hard to progress the relatively short lived existing arrangements, and risk loss of momentum or disengagement. It could be the final straw for an already disillusioned Borough. We think it essential that this type of issue should be addressed in a transition to new boundaries, with recognition and support to assist those concerned to adjust not only to new formal sub regional framework documents but also such problems as the need to re-forged local networks, organisational structures and take account of work in hand that could not easily be realigned to the new boundaries. The short term cost of doing so would not be insignificant but would be essential. We were heartened by the way that each of the Partnerships confirmed that they would and could adjust to new boundaries even if these were not their first preference.

4.72 In similar vein, the existing West London Partnership asked to retain the title “West” for its sub region rather than “North West” as proposed in the FALP. We think that this is reasonable bearing in mind the intended new “North” Sub Region and having regard to the overall geography of sub regions as shown in Fig 4.2 above. Retaining the title “West” combined with a change solely comprising the addition of just one Borough (Kensington & Chelsea) would minimise transitional upheaval at least in this area of London. The Mayor has since confirmed his acceptance of the suggestion (BN66).

4.73 Finally, we return to the issue of safeguarding promotion of the London Thames Gateway as a whole following its division between sub regions. We understand the strong wish of the Gateway to London (GtL) and TGLP to dot the i’s and cross the t’s on this but, as on a number of issues, we are sympathetic to the Mayor’s desire to keep the overall length and detail of the Plan in check. He suggested simply inserting “as a whole” into FALP paragraph 5.200, to signal his continued commitment to a holistic and joined up approach. GtL accepted in a well-argued subsequent written BN (BN8) that its initial more elaborate suggestions may not be tenable, but settled for an additional sentence, in place of the Mayor’s insertion: “Where existing pan-Gateway delivery mechanisms are in place and working, these should continue to work across the new sub regional boundaries”.

4.74 We suspect that there is now little of substance between the Mayor and GtL/TGLP on this. Giving priority to the Gateway is one of the Mayor’s overarching policies (Policy 2A.1i) and without doubt splitting this key growth area is one of the undesirable consequences of the new sub regional structure (albeit outweighed as we have concluded by other considerations). This seems to us a prime example of the need for permeable working across a new sub regional boundary, sufficiently so and for a sufficient period of time to justify the simple inclusion sought in BN37. As there are also a number of uncontentious

modifications suggested to correct and update this paragraph we reproduce it completely as recommended for inclusion.

## Overall Conclusions

4.75 Periodically updated versions of the London Plan are intended to set strategic guidance for London for as far ahead as can be envisaged. We must assume for decades to come. On balance, we believe that it would be better over the longer term to cut losses arising from the Plan's inaugural but unsatisfactory sub regional structure, subject to sensitive and properly resourced transitional arrangements.

4.76 We take the opportunity to urge all concerned to treat the change as an opportunity, unlikely to be repeated, to enhance collaborative partnership working between the Mayor, his several Agencies, the Boroughs and business, community and voluntary groups within each sub region, and as necessary permeably across the boundaries.

### **Recommendation 4.4**

We recommend that the sub regional framework proposed in the FALP be confirmed subject to:

- sensitive and properly resourced transitional arrangements;
- Sub Regional Development Frameworks being replaced by Sub Regional Implementation Frameworks, with a corresponding shift in their emphasis in line with the new title, and so referred to throughout the Plan;
- retaining the title "West" (rather than North West) for the new sub region based on the existing West Sub Region;
- modifying FALP paragraph 5.200 to read in full: "The Mayor is working with a broad range of partners to develop and pursue a 'joined-up' approach to the Thames Gateway. Where existing pan-Gateway delivery mechanisms are in place and working, these should continue to work across the new sub regional boundary. A Mayor's Officer-led Steering Group comprises the Thames Gateway London Partnership, the London Strategic Health Authority, Transport for London, the London Development Agency, London Thames Gateway Development Corporation, East London Learning and Skills Council, the Environment Agency and others. The Steering Group has worked closely with the Department for Communities and Local Government and other regions through the Thames Gateway Strategic Partnership to develop the Thames Gateway Interim Policy Framework (DCLG

November 2006), which sets out key investment priorities in the growth area.”

---

## Chapter 5 Designated Localities

### Preamble

5.1. In this Chapter we examine what, for want of a better term, we have chosen to call “designated localities”. These are either a category of locations, for example ‘town centres’ or an individual, named locality such as, say, Croydon Town Centre. The localities include a range of places, widely differing in kind and size, but all subject to bespoke development policies in the London Plan and its Further Alterations. We have included the Central Activities Zone (CAZ), Town Centres, the ‘Suburbs’, Opportunity Areas (OAs), Areas for Intensification (AfIs), Areas for Regeneration (AfRs), the Olympics/Paralympics area and Strategic Industrial Locations (SILs).

5.2. These are not new designations introduced by the FALP<sup>1</sup> and, as with other topics, our remit is to look at the changes now proposed, not those aspects retained from the 2004 Plan or its 2006 Early Alterations, nor ideas that might have been proposed in the FALP but were not. As a result, in one or two instances we can do no more than draw attention to issues put to us, to which we are sympathetic, without reaching conclusions or making recommendations.

5.3. Changes that are proposed by the FALP vary from wide ranging to quite detailed, and their impacts interrelate between one locality, or type of locality, and another. Indeed the more extensive localities can and do encompass the more compact: for example the Suburbs include Opportunity Areas, which in turn can include a Town Centre. Therefore, although we look at each type of locality in turn, we do not lose sight of the fact that it is the cumulative totality regarding them all that will determine the future direction of London.

5.4. In all, the range of interrelating issues, some subject to FALP changes and others not, meant that we found the subject of this Chapter the most awkward to define for public Examination and to report on. In the main, however, we have found these aspects of the FALP to be robust, logical and founded on an impressive evidence base. We make only a limited number of recommendations for modifications, mostly in line with matters agreed by the Mayor during the Examination process. As well as the recommendations within this Chapter, we have picked up on some additional detailed matters that we have added as further items to those set out by the Mayor in BN72, and now taken forward in our Appendix B. These address a wide variety of detailed, but nonetheless in many cases important, considerations. One is to recognise the value of “policing services” as an aspect of social infrastructure more widely than solely in the context of Policy 3A.14.

---

<sup>1</sup> Strategic Industrial Locations were formerly Strategic Employment Locations but the concept behind the designation is not new.

5.5. We also bear in mind throughout that although the localities being considered are subject to specific policies, they are also subject to the Plan's generic policies that have application across London as a whole, including those that are 'safeguarding' in their aims, for example to protect residential amenity. A recurring refrain at our Examination was Participants seeking to have these types of policies included also within those parts of the Plan that set out the aims for individual, named locations.

5.6. We understand this desire but share the Mayor's general view that the Plan has to be read as a whole. Repeating or cross referencing generic policies within each set of locational policies would greatly lengthen the Plan or at the very least make it more complex. Also, since it would plainly be impractical expressly to link every generic policy with each locational one, those not so linked might by implication be seen as somehow less relevant in a particular locality. This could unintentionally weaken rather than strengthen how the safeguarding policies are perceived and applied in practice.

### **Demographics and Employment Projections**

5.7. Objective 1 of the Plan remains "To accommodate London's growth within its boundaries without encroaching on open spaces." Even if this unaltered Objective was within our remit to consider, we would see no reason to do so. Bellway and the Consortium of Registered Social Landlords (CRSL), along with one or two others, did express some scepticism about the Plan's housing objectives being achievable without reviewing the Green Belt. But these thoughts were not progressed substantively, and would in any event lie well outside the terms of our Examination of the FALP. We take as a starting point that the Plan seeks neither to decant population into adjoining regions nor to rely on development of open spaces such as the Metropolitan Green Belt or Open Land. This is an important factor in our consideration of the 'designated localities'.

5.8. In its Preamble and Introduction the Plan descriptively refers to London having absorbed the equivalent of the population of Sheffield over a period of 15 years and being expected to grow by the equivalent of Leeds over the ensuing 15 years with continued growth beyond 2016. Paragraphs 1.32 onwards, as updated by the FALP, put some figures to this broad picture: in 2005 London's population "was estimated to be more than 7.5 million. The best current estimate of projected growth is a range, with that for 2016 (8.05 – 8.19 million) only slightly different than anticipated in the 2004 London Plan, rising to 8.36 – 8.71 million by 2026." The FALP then look at age structure and ethnicity, foreseeing a continuation of a population that is "younger" than the country as a whole, with a further significant growth in black and minority ethnic communities contributing particularly to the increased working age population.

5.9. Paragraph 1.41 onwards, again updated by the FALP, looks at economic growth and employment change, for London as a whole and by sectors.

Fundamentally, the FALP record a gain of 610,000 jobs in financial and business services and a loss of 460,000 in manufacturing over the past 20 years. The net overall growth in jobs between 2006 and 2026 is projected to be 847,000, predominantly still in the financial and business services sector but with a substantial contribution from people-centred services, including entertainment, leisure and retailing, and from hotels and catering. Manufacturing as a whole is seen as continuing to decline but with important new opportunities in such areas as design, creative and green industries.

5.10. At our invitation economists and statisticians from the GLA enlarged on the data at the preparatory seminar prior to the EiP<sup>2</sup>. As well as these, we have also found useful background information in the “London Employment Projections” (BN7); “More residents, more jobs?”<sup>3</sup>; Outer London: Issues for the London Plan<sup>4</sup> and in Ian Gordon’s paper “Future Growth in the Outer London Economy”<sup>5</sup>. This last was valuable as an expert critique from outside of the Mayor’s team, albeit that it predated the current version of the London Employment Projections.

5.11. As stressed at the seminar, strategic projections need to be looked at broadly, not in undue detail, and are regularly subject to revision as new data become available. Refined population projections were presented at the seminar, with further refinements imminent stemming from ONS revisions (particularly regarding net international migration) which DCLG are to convert to households. The outcome may trim the FALP mid range projections but can still be expected to leave something close to a 1 million population increase between 2006 and 2026. There has been little or no challenge to these figures, and the more recent small adjustments are plainly insufficient in themselves to warrant policy updates to the FALP.

5.12. We will look at aspects of the employment projections further below. Not unsurprisingly, there was more in the way of challenge to some of these figures, especially when disaggregated between different parts of London such as the inner and outer areas. As with the 2004 Plan projections, those in the FALP are said to be (paragraph 1.42) “the most authoritative currently available. However, they are still only indicative and may over or underestimate the employment growth which could take place in some parts of London. It is not the intention to constrain growth and it should be fostered and provided for in accordance with the policies set out in this plan: they, and the variables which inform them, will be closely monitored.”

5.13. While accepting this approach as correct in principle, the Ian Gordon Paper (p 40) makes a fair point, as did some Participants, that employment projections are not entirely policy neutral but to some extent self fulfilling. Not only is

---

<sup>2</sup> Seminars held on 10 May 2007.

<sup>3</sup> More residents, more jobs?, Volterra Consulting, 27 June 2005.

<sup>4</sup> Outer London: Issues for the London Plan, Mayor of London, 2007. CDL-LW082

<sup>5</sup> Future Growth in the Outer London Economy, LSE, 2006. CDL-LW010

infrastructure investment, for example in public transport by TfL, influenced by such projections but the degree of optimism or pessimism may in a less tangible but still material way influence business investor confidence or lack of it. Conversely, it cannot be gainsaid that “it is hard see how the Mayor can do anything other than include in the FALP those projections that he believes to be the most accurate. What the Mayor cannot reasonably do is introduce projections or targets that he knows to be too high. In any event, the FALP are quite explicit about these being ‘projections’ and not targets”<sup>6</sup>.

5.14. We have, therefore, looked carefully at the projections and how they were derived, as set out in BN7. London-wide projections broken down into 12 broad sectors<sup>7</sup> were produced by Volterra Consulting for GLA Economics, together with projections in-house by GLA Economics for the whole economies of each Borough. These Borough level projections were based on an innovative methodology: “triangulation” combining historic trends, transport accessibility and business site capacity. The Borough projections were adjusted to ensure that in total they equalled the London-wide figures. Roger Tym and Partners then broke the Borough level projections down into three broad categories: office, industrial and other employment.

5.15. We note in BN7 a good correlation between the GLA Economics/Volterra London-wide overall projections and the ranges separately produced (on somewhat different timescales) by four leading independent forecasting organisations: Experian Business Strategies (EBS), Cambridge Econometrics (CE), Oxford Economics (OE) and the Centre for Economic and Business Research (CEBR).

5.16. We note too the broadly similar pattern in the GLA Economics sectoral breakdowns and those by EBS, CE and OE, albeit that there is some variance between individual sectors. For example, GLA Economics were pessimistic compared with the others regarding construction employment but this has little impact on the total figures.

5.17. There are fewer external comparators for the Borough level projections, but EBS has produced a complete coverage and OE a medium term four-way breakdown for Westminster, City, Tower Hamlets and the rest of London. To the extent that is possible to use these as benchmarks, GLA projects between the other two for the three Boroughs (above EBS/below OE); above EBS for the rest of inner London; and below EBS for outer London until about 2011 and then above. It may be noted, however, that as EBS’s was the most pessimistic of any London-wide projection over the longer term, it is reasonable to assume that had the other

---

<sup>6</sup> Outer London: Issues for the London Plan, Mayor of London, 2007, paragraph 3.17. CDL-LW082

<sup>7</sup> Business services, Other services, Hotels and Restaurants, Retail, Financial services, Health & education, Wholesale, Primary & Utilities, Transport & communications, Public administration, Construction, Manufacturing.

organisations produced Borough breakdowns, their inner and outer London projections may well have been closer to those of the GLA.

5.18. Overall, therefore, we believe that the approach taken is sound, and certainly we have been shown no better, or indeed any, alternative set of projections. In particular, we can see the logic behind the triangulation approach in a large conurbation with many interlocking economic relationships.

5.19. Finally, before turning to the various ‘designated’ localities, we will consider “More residents, more jobs?” This persuasive analysis demonstrates, we believe robustly, that in areas of London with comparatively low accessibility, every additional 1,000 residents creates, on average, an additional 230 new jobs. At ward level the analysis compares population densities, employment densities and relative levels of accessibility. This last is defined by the number of people who could commute to the ward in question by public transport in not more than 45 ‘generalised’ minutes<sup>8</sup>.

5.20. The concept is fairly straightforward; employment in highly accessible wards such as those in central London is largely determined by accessibility (the number of people who can commute) but less so in less accessible suburbs. The quantification of that concept is complex but logical and systematically argued. It is important to bear in mind that the outcome does not suggest that the relationship of 230/1000 will hold good for any individual residential development but will do so at, say, a Borough scale or above. We return to this conclusion when looking at London’s suburban economy.

## **Transport Programme**

5.21. In Chapter 6 we will consider some detailed transport issues raised by the FALP. However, here we look at the third important ‘projection’, in many ways the link between those for population and employment, in “Transport 2025: transport vision for a growing city” (T2015)<sup>9</sup>. It is important to stress that this document is not before us for Examination – it is separate from the FALP – but we do see it as an essential underpinning: it sets out the Mayor and TfL’s transport strategy and desired investment programme to 2025. Published in 2006 it is in line with, and very much the counterpart to, the objectives and spatial strategy driving the FALP.

5.22. It is not difficult to understand concerns raised with us about whether the transport network could cope with levels of growth envisaged in the FALP. As the TfL Commissioner, Peter Hendy, put in his foreword to T2025: “The conclusions of the T2025 work are clear and the choices stark. Even with a wide-ranging programme of demand management measures, transport demand will

---

<sup>8</sup> An established transportation concept, recognising that travellers value time differently, for example that used during a modal switch is a greater deterrent than the same time spent moving.

<sup>9</sup> Transport 2025: transport vision for a growing city, TfL, 2006. CDL-LW008



increase much faster than the currently funded level of capacity improvements. Without significant investment, crowding level on public transport and traffic congestion would rise well beyond the existing unacceptable levels.”

5.23. The Executive Summary goes on to say that: “To support this economic development [essentially that envisaged in the FALP] there are two inter-related transport challenges. The first challenge is to improve London’s public transport system to accommodate the growth of employment. This has two components, namely getting people to work on reliable radial links within acceptable levels of crowding; and accommodating the more dispersed growth of housing, employment and leisure trips in outer London and the suburbs, ensuring that as many trips as possible use public transport, walking or cycling. The second challenge is to effectively manage the road network, reduce traffic congestion and reduce carbon dioxide (CO<sub>2</sub>) emissions.” A range of measures is set out including a major programme of investment in public transport: the tube, national rail and buses.

5.24. The document does indeed show starkly<sup>10</sup> that on past levels of investment, increased congestion would be a major constraint on the potential levels and pattern of growth envisaged in the FALP. More reassuringly, it also demonstrates how increased capacity would be brought into line with projected increased demand by the full programme<sup>11</sup>, lowering congestion on the tube and national rail below that in 2006. Important components of this would substantially increase accessibility from outer London to the CAZ, increase accessibility from the 10% most deprived localities to Town Centres and the CAZ and achieve a modal shift from car to public transport, walking and cycling.

5.25. As the London Assembly fairly pointed out, funds for much of this programme have yet to be committed, particularly in the later years. Key elements depend on Government for decisions and funding, with the Comprehensive Spending Review 2007 an important stage. However, we think that this is pretty well an inevitable feature of long term strategic spatial planning for London. The important points are that the programme has been set out, aligned with the FALP, and would provide the necessary transport capacity for the growth envisaged. We cannot see on what other sensible basis the Mayor could proceed, subject, of course, to the need to monitor and manage both the spatial strategy and transport programme to keep them broadly aligned in practice.

## **The Central Activities Zone (CAZ)**

### *The extent and format of the CAZ*

5.26. Policy 2A.1iii: The Central Activities Zone, commits the Mayor and requests Boroughs to “use the CAZ boundary shown diagrammatically in Map

---

<sup>10</sup> For example at Fig 9 and related text.

<sup>11</sup> For example at Fig 14 and related text.

5G.1 as the basis for coordinating policy to address the unique issues facing the Zone. The detailed boundaries should be defined in DPDs.” In accordance with the Regulations<sup>12</sup> and GOL Circular 1/2000<sup>13</sup> this “Map”, as with others in the Plan, is not on a cartographic base. Policy 5G.1: The Indicative CAZ boundary, confirms the indicative nature of the boundary: “It should be refined through joint working on the Sub-Regional Development Frameworks and the CAZ planning framework for identification in the boroughs’ DPDs. Any future changes that may be needed should be developed in association with the Mayor.” Our recommendations in Chapter 4 on Sub Regional arrangements would lead to some consequential changes to the wording of this policy but not its principles.

5.27. Westminster, in particular, argued strongly that the FALP approach is flawed. The Council argued that the CAZ should be seen not as a defined area as such, but a policy tool with respect to central activities. The Council saw Map 5G.1 as too definitive for an indicative diagram in a Spatial Development Strategy, and opposed the inclusion of residential areas, such as Fitzrovia, Pimlico and Marylebone. As Westminster and several others also saw it, inclusion in the CAZ imparts priority to commercial activities and undermines protection for residential use and residential amenity. Its representative contrasted the inclusion of some residential areas with the Mayor’s intention not to include the Chelsea Barracks site now that residential based development there has been confirmed.

5.28. In somewhat similar vein, the Council opposed inclusion of the Royal Parks and they criticised the depiction of “CAZ Frontages”. Other Participants also argued against inclusion of peripheral OAs (such as Kings Cross) within the CAZ boundaries.

5.29. It seems apparent that there are quite different concepts of the CAZ encapsulated in Westminster and the Mayor’s positions. The Mayor pointed to the 2004 Plan Map 5B.2<sup>14</sup> as already taking in a wider area including, for example, the Royal Parks and peripheral OAs.

5.30. We accept, as at least implicitly did most Participants, that there needs to be a common understanding of the format and broad extent of the area intended for inclusion in the CAZ, and we note that GOL did not query the level of detail depicted on Map 5G.1. We consider that broadly speaking this map, in its level of detail, strikes a reasonable balance between being informative without being definitive. In this regard it is not dissimilar from the level of detail on the 2004 map.

5.31. However, in other regards we do not see the Mayor’s reliance on the 2004 map as a conclusive answer. That map is titled “Central Activities Zone” and its small positional location inset clearly shows an extent including such areas as the

---

<sup>12</sup> Strategic Instrument 2000 No 1491, The Town and Country Planning (London Spatial Development Strategy) Regulations 2000, section 5(4). CDL-CG025

<sup>13</sup> Strategic Planning in London, GOL Circular 1/2000, paragraph 2.18, GOL, 2000. CDL-CG013

<sup>14</sup> The London Plan, Mayor of London, 2004, p 232. CDL-LW002

Parks and peripheral Opportunity Areas. But the main map does not expressly show an outermost boundary, and it is unclear on its face whether solid colours used to depict the Parks and OAs are intended to overlay the CAZ depiction or adjoin it. Supporting text suggests the latter. In Chapter 5, neither the 2004 Plan nor the FALP links the OAs directly to the CAZ. The map also features several blank areas, not depicted, implying that these were excluded from any particular designation. Even on its quasi-diagrammatic base, these blank areas do appear broadly to coincide with identifiable predominantly residential areas.

5.32. As confirmed in the 2004 Plan, this map originates from work by the former London Planning Advisory Committee in 1998, during the lengthy hiatus between the GLC and Mayoralty. We are aware that at that time a “Wider Central Area” complemented the CAZ, and although this was not formally included in the 2004 Plan its echo is perhaps evident in the format of Map 5B.2.

5.33. The more recent Central London Sub Regional Development Framework (SRDF)<sup>15</sup> acknowledges (paragraph 162) that the indicative boundaries of the CAZ on Map 5B.2 had by then become dated and some had changed through UDP reviews. There had evidently been a debate (paragraph 163) about the 2004 map format during the SRDF preparation process. In any event, as issued the SRDF includes a suggested revision to the map (Annex 4, Fig 2A.3) “which will inform the review of the London Plan.” This same map is also reproduced in the East London SRDF<sup>16</sup>.

5.34. The map still does not expressly show an outermost boundary but it is, we think, clearly intended to embrace all the designated sub areas, including the Parks and peripheral OAs, as components rather than adjuncts to the CAZ, and it leaves no blank ‘holes’ that could be seen as excluded. The FALP Map 5G.1 is broadly similar in substance and also expressly shows an outer boundary around all the various localities. During the examination, the Mayor suggested detailed modifications (BN22<sup>17</sup>) to Map 5G.1.

5.35. The CAZ is a longstanding concept, addressing the core of what has become a world capital city. No one has disputed the vital need for London’s strategic spatial strategy to address this core. There is plainly more than one approach, but we consider that adopting a wider, all embracing boundary, as has evolved via the SRDF process, is the better way forward and certainly preferable to retaining an ambiguous map as the basis. There is, of course, the self evident qualification to this, that inclusion within such a CAZ cannot carry with it any perception that commercial activities must everywhere take priority to the exclusion of other uses.

---

<sup>15</sup> Sub-Regional Development Framework - Central London, Mayor of London, 2006. CDL-LW053

<sup>16</sup> Sub-Regional Development Framework – East London, Mayor of London, 2006. CDL-LW057

<sup>17</sup> As initially submitted, this map included a minor colour printing overlay error, subsequently corrected.

5.36. We received such an assurance from the Mayor. Chapter 5G describes an amalgam of features that make the CAZ unique, and uniquely important to London and the UK. Business and commerce, of course: the CAZ is the location for some 1.37 million jobs and set to grow<sup>18</sup>. But also “activities including central government offices, headquarters and embassies, ... and the offices of trade, professional bodies, institutions, associations, communications, publishing, advertising and the media.” It is a premier location for tourism, heritage, culture and entertainment and includes two shopping centres of international standing.

5.37. On a detailed point, there was agreement at the EiP that the CAZ map legend indicating “Strategic Cultural Areas” should revert (as in the 2004 Plan) to a more appropriate designation of: “Mixed uses with a strong arts, cultural or entertainment character.”

### **Recommendation 5.1**

We recommend that the relevant sub area of the CAZ Map 5G.1 retain the description used in the 2004 Plan “Mixed uses with a strong arts, cultural or entertainment character.”

#### *Residential areas*

5.38. This part of London is also home to some 280,000 residents who, far from being displaced, have about doubled over the past 10 years<sup>19</sup>. There can be little doubt that sizeable numbers of people living within the area adds to its vitality, and they in turn are able to benefit from facilities on their doorstep, in contrast to the leaden nature of some city centres outside of business hours. Policy 5G.5 aims to:

“Support measures which improve the environment for local residents and also achieve the wider objectives for the Zone, notably its role as a premier global business location;

Maximise provision of new housing within the Zone in ways which will not compromise achievement of wider objectives;

Work with social and infrastructure providers to meet the needs of both local residents and that generated by the large numbers of visitors and workers in CAZ.”

5.39. We do not see how, as was portrayed to us, this policy is somehow antithetical to residential interests. The residential environment and provision of new housing are each given strong emphasis but, as we commented in Chapter 2 BRN, no single policy area – in this case residential – can be accorded total primacy over other key objectives of the Plan. For similar reasons, we consider that the supporting text to Policy 5G.5, paragraphs 5.186 to 5.187, does not

<sup>18</sup> FALP paragraph 5.174.

<sup>19</sup> Mayor’s evidence and FALP paragraph 5.172.

require amending to ‘strengthen’ it as suggested at the EiP. We do not underestimate problems of disturbance or encroachment on the residential areas, but this would not be reduced simply by how the CAZ is defined. Policy 4A.14 is aimed at reducing noise nuisance and the Mayor has issued Best Practice Guidance<sup>20</sup> regarding noise from night time activity.

5.40. We can see a distinction between the Mayor’s intention not to include the residential Chelsea Barracks site on the edge of the CAZ – now that it is no longer seen as linked to the Victoria OA – and his inclusion of established residential localities enclosed by the Zone, and which would otherwise not be subject to Policy 5G.5.

#### *The Opportunity Areas*

5.41. We support inclusion of the Strategic Opportunity Areas, both those already shown, though ambiguously, on the 2004 Plan Map 5B.2 – primarily Kings Cross, Paddington and Vauxhall/Nine Elms – and also in principle the new additions east of the City, south of the River and at Euston. These are all localities either in the process, or offering the prospect, of enlarging and reinforcing London’s position as a world city and its essential contribution to the UK economy. (We look below at some issues regarding the OAs themselves.)

#### *The Royal Parks*

5.42. Nor can we see any problem with unambiguously including the Royal Parks. These green expanses contribute to the mix that makes central London the success that it is, providing space for relaxation, exercise and relative tranquillity, and on occasions (along with Trafalgar Square) a venue for public assembly to protest, celebrate or grieve. The Parks are an established component of central London; we think it far fetched to see their inclusion in the CAZ as a harbinger for commercial development.

#### *Canary Wharf*

5.43. Canary Wharf is a major and growing business centre, not limited to offices but including retailing and community activities. However, we see little case for its inclusion within the CAZ. Although Canary Wharf outshines many business centres, and has grown, to almost 90,000 employees in 2005 (FALP paragraph 5.74), it nonetheless pales when compared in scale, character and variety with the CAZ. As an example, on other uncontested figures, Canary Wharf/Isle of Dogs has about 1.6 million square metres of offices, the CAZ about 18 million. Other comparisons would be broadly similar.

5.44. Inclusion as an *outlier* of the CAZ, as urged by Canary Wharf plc and supported by some others, would be anomalous, failing to recognise that it is the

---

<sup>20</sup> Managing the Night Time Economy: Best Practice Guidance, Mayor of London, 2007.

interaction of its whole that makes the CAZ unique. Canary Wharf's inclusion as an *extension* to the CAZ would pose worse problems and create major planning incompatibility across the intervening areas of London, including Stepney and Poplar, which are wholly different in character. No one promoted this second option.

5.45. Canary Wharf's inclusion in the CAZ was not recommended by the Panel who examined a draft of the 2004 Plan, although we understand from the Mayor that they heard representations urging them to do so. In response to the FALP, Tower Hamlets remained opposed to Canary Wharf's inclusion. None of this has inhibited continued successful growth and diversification, but not so as to make the locality a logical addition to London's CAZ. We return again briefly to Canary Wharf at paragraph 5.92 below when considering Town Centre designations.

### *CAZ Frontages*

5.46. The "CAZ Frontages" ("Mixed uses with strong retail character" in the 2004 Plan) are intended to delineate shopping localities within the CAZ where, aside from the two Metropolitan Centres, a Town Centre hierarchy as normally understood has little application. We do not accept suggestions by some retailers that, within the CAZ, there is no need to control retail locations via a sequential test in accordance with PPS6<sup>21</sup>. The benefits of focussing retailing in recognisably 'shopping' locations is no less evident in the CAZ than elsewhere, though plainly the normal concept of 'town centres' needs to be applied to the unique circumstances of central London. We see the 'frontage' approach as a useful retail policy tool for achieving this, to distinguish between preferred and non-preferred retailing locations. It does not necessarily preclude the designation of main rail termini, as WPOA implied, but this would need to be judged on a detailed and individual basis, having regard for the station's surroundings and relationship to existing retail outlets.

5.47. However, although some lengths of frontage depicted on Map 5G.1 can be readily related to well known locations; others are less self evidently identifiable on this quasi diagrammatic map. We can see that there is little or no difference in the depiction of CAZ Frontages between the FALP map and that in the SRDFs, prepared in conjunction with Boroughs and other stakeholders. But we have struggled fully to reconcile the map depictions with the list of CAZ frontages in FALP Annex 1.

5.48. Nor is it clear how the list has been drawn up. In part it straightforwardly comprises shopping locations classified as District Centres in the 2004 Plan, now reclassified because they fall within the enlarged CAZ. Other locations, such as those in the City, were identified in the Central SRDF Annex 1 for inclusion. The process leading to the inclusion of some other locations is less obvious, for

---

<sup>21</sup> Planning Policy Statement 6: Planning for Town Centres, DCLG, 2005. CDL-CG029

example Baker Street (part), Victoria Street or Covent Garden/Strand, while the inclusion of Whitechapel was an acknowledged error that is corrected within our Appendix B.

5.49. We have above commended the CAZ Frontage approach in principle, and we do not suggest that the identified locations are necessarily inappropriate – they are in any event no more than a strategic steer to more detailed work – but that steer needs to be robust and consistent between Map 5G.1 and Annex 1. The status of the West End and Knightsbridge as CAZ Frontage also needs to be made clear (BN22).

**Recommendation 5.2**

We recommend, while endorsing the “CAZ Frontage” classification overall, that there should be a further reconciliation of Map 5G.1 and Annex 1 prior to formal adoption, and that the word “other” should be inserted before “Central Area Frontages” in Policy 5.G.1

5.50. Finally on this topic, GOL raised the question of how the sequential test is intended to be applied: should Policy 5G.4 clarify the sequential order (or equivalence) between the CAZ Frontage and Town Centres? As noted above, we recognise the value of a sequential approach that distinguishes between retailing and non-retailing locations, but we agree with the several Participants who suggested that the second bullet point to the policy is potentially confusing in trying to distinguish a hierarchy within the retailing locations. As suggested by the Mayor the simplest solution is to delete the specific reference to the sequential test, which in the context of the CAZ appears to add nothing.

**Recommendation 5.3**

We recommend that the words “applying the sequential test” be deleted from the second bullet point of Policy 5G.1

*Conclusion on the extent and format of the CAZ*

5.51. In all, we consider that a more widely delineated CAZ, along the lines now proposed in the FALP, is the right approach and consistent with the sub regional arrangements that we endorsed in our preceding Chapter. The CAZ is both a policy and a geographic expression, and we looked in Chapter 4 at the process envisaged for producing its Planning Framework.

**Recommendation 5.4**

We recommend that the map attached to BN22 (as corrected for printing overlay errors) be substituted for Map 5G.1 in the FALP.

---

*Policy for the CAZ*

5.52. Objective 1 in the Plan, referred to at paragraph 5.7 above, is supported by a series of “key policy directions” in part retained from the 2004 Plan and in part introduced by the FALP. These include, amongst other things, enabling the CAZ and main OAs to intensify and accommodate much of the growth in jobs; making North East and South East London priority areas for new development, regeneration and investment; promoting London’s polycentric development and a stronger and wider role for town centres; and improving suburban areas.

5.53. Objective 3: “To make London a more prosperous city with strong, and diverse long term economic growth” similarly lists key policy aims, again in part retained from the 2004 Plan and in part introduced by the FALP. These include, amongst other things, creating and maintaining an adequate infrastructure base for London’s business and financial and services sector ... concentrated in the CAZ and its associated OAs including the Isle of Dogs and Stratford; strengthening the offer of London’s economy ... including the night time economy; and strengthening the West End as a global shopping destination.

5.54. Policy 2A.1i, The spatial strategy for development, lists aims which the Mayor will seek to influence, including “strengthening the strategic role of the Central Activities Zone including the West End Special Retail Policy Area [WESRPA] to intensify and accommodate substantial growth, especially in economic activity.” These aims are taken forward in Chapter 5G, and in particular Policy 5G.4 with regard to the WESRPA.

5.55. John Lewis Ltd, London First, the Forum and others described an urgent need to revitalise West End retailing, Oxford Street in particular, giving support to the WESRPA. Although Westminster questioned the purpose of a WESRPA this was very much a minority view, and it is the Panel’s understanding that the Policy is simply to give support to this already designated Area, and we see no basis for questioning that.

5.56. However, views on the more general aim further to strengthen the role of the CAZ were divided. Those opposed saw the aim as weakening, or further weakening, the economies of outer London localities, in conflict with other key objectives of the FALP. They questioned the ability of the transport network to accommodate the level of implied additional commuting to the centre. They challenged the impact that centrally located growth is having, and would increasingly have, on central London neighbourhoods and small-scale enterprises, particularly those at the Zone’s outer fringes. The emphasis on the centre was seen as inconsistent with the aim for polycentric development. Policies to encourage and facilitate dispersed economic growth were urged, including more investment in orbital rather than radial transport infrastructure.

5.57. At the outset on this, we note first that the aims and policies in the FALP are far from being entirely new: Objective 1 in the 2004 Plan included an aim to



“Enable the centre of London and the main Opportunity Areas for development to intensify and to accommodate much of the growth in jobs”. The FALP simply substitutes the “Central Activities Zone” for the “centre of London” and is we think consistent with the wider definition of the CAZ that we endorse above.

5.58. We also reflect on the fact that London is an international financial and business centre, successfully performing a world role and contributing massively to the UK economy, the bedrock supporting our nation’s wellbeing and ability to aid others. As paragraph 1.10 of the FALP observes, “London is one of the few regions to make a significant net contribution to the national exchequer”. Economists evidently struggle to define the amount, but there is no reason to doubt that it amounts to billions of pounds per annum.

5.59. London is the location of choice for many global companies, but it is a *choice* to locate, remain and expand here rather than elsewhere. Commentators attribute numerous factors in favour of London: a comparatively safe environment, well educated workforce, the English language, favourable tax and regulatory regimes, an open, diverse and welcoming society. But there are also the important mutual attractions of agglomerating with other like businesses, and doing so in a dynamic city centre.

5.60. We received clear evidence that major global companies choose not simply London but predominantly the CAZ for their headquarters. Canary Wharf is one alternative, but itself quite central, and the environs of Heathrow may be another. There will obviously be exceptions, but overall there is a pattern of companies locating financial and business headquarters in the centre of London while ‘back office’ functions (and some HQs) take advantage of the opportunities available at locations such as Reading or Swindon. It would be little more than a pious hope to expect many international companies to relocate their headquarters to outer London were they unable to be accommodated in the centre. Croydon, for example, is an accessible outer location that has striven for many years to attract such companies, with limited success.

5.61. The near certain outcome of failing to accommodate major businesses in central London would be their relocation elsewhere altogether, quite possibly abroad, with seriously damaging economic consequences for London and the UK as a whole. As the Mayor, in person, acknowledged: past attempts at directing business locations failed, however much as an “old socialist” he might regret that. In Chapter 3, paragraph 3.12, we touched on the concept of a National Spatial Development Framework for England, which could consider these types of wider interregional issues, as to a more limited extent could the Interregional Forum comprising London, SEERA and EERA. However, these are not matters for the Mayor alone and we fully endorse the FALP emphasis on a successful and growing CAZ.

*International Convention Centre (ICC)*

5.62. Paragraph 3.243 identifies that although London has a number of conference and exhibition centres it lacks purpose built facilities for conventions above 3,500 delegates, which is seen as needed to compete in this sphere with other leading cities. Thus far the paragraph does no more than roll forward an aspect of the 2004 Plan, which concluded by committing the Mayor to work with the London Development Agency (LDA) and other partners to consider the economic case and best location for an ICC.

5.63. Since then a Mayoral Commission has reported<sup>22</sup>, supporting the case for an ICC in central London, and we also received a compelling economic case from the LDA. It seems to us that the need in principle was largely established by the 2004 Plan, but to the extent that this remained contingent on an economic case being made that has been achieved.

5.64. As regards location, paragraph 3.243 concludes by linking a Centre with wider rejuvenation of the West End. Paragraph 5.36 suggests that the Tottenham Court Road locality could be appropriate as part of a wider mixed use development, while paragraph 5.183 refers to a Centre being under consideration in the West End. These elements of the FALP were very controversial and opposed by, amongst others, the Covent Garden Community Association (CGCA).

5.65. We see no reason to recommend expressly against a West End location, or more specifically against somewhere around Tottenham Court Road, but we have seen no evidence for a preferred location more specific than central London. The FALP should not pre-empt more detailed consideration. We therefore endorse modifications discussed at the EiP and carried forward by the Mayor in BN22.

**Recommendation 5.5**

We recommend that paragraph 3.243 be deleted and replaced by:

"A Mayoral Commission established in 2004 to assess the need for, and feasibility of, developing an International Convention Centre (ICC) in London concluded that due to the lack of suitable purpose-built convention facilities the case for an ICC is 'extremely strong'. The Commission's report stated that without a world-class purpose-built ICC, London could stand to lose out on significant potential business on the back of the successful 2012 Olympic bid, and that the opportunity cost of not having a suitable ICC would be substantial. The Commission concluded that the ICC should be located in central London."

<sup>22</sup> ICC Commission Report, LDA and Mayor of London, October 2005. CDL-WS034

**Recommendation 5.6**

We recommend that the final sentence of FALP paragraph 5.36 be deleted to remove a reference to the Tottenham Court Road locality as a possible appropriate location for a major convention centre.

**Recommendation 5.7**

We recommend that paragraph 5.183 reads: "Policies 3B.10 and 3D.6 highlight the particular importance of CAZ as the country's prime visitor destination, and the need to enhance the quality of its visitor offer. They also suggest ways in which its high visitor numbers can be managed. An International Convention Centre would most suitably be located within or around CAZ. The Mayor's CAZ Framework, Tourism Vision and Action Plan and the Tourism Development Framework for Central London will provide further guidance."

*Offices*

5.66. Policy 5G.3 commits the Mayor and required Boroughs to recognise the CAZ as the UK's "most important strategic office location" (on which not surprisingly there was no dispute) and to "ensure adequate capacity to meet future demand with supporting policies to enhance it as a globally attractive business location." The policy continues by promoting increased office capacity in appropriate locations within the western part of the CAZ and "without compromising the local environment, seek solutions to the constraints on office provision imposed by extensive heritage designations including the role of high quality design in complementing these." Finally, "within the CAZ and north of the Isle of Dogs OA, wherever increases in office floorspace are proposed they should provide for a mix of uses including housing, unless such a mix would demonstrably conflict with other policies in this plan."

5.67. Westminster, in particular, challenged whether there is in fact an underlying need for more office space in the western part of the CAZ, stressing the heritage issues and referring to a press report of low rentals recently negotiated. Others, including London First, WPOA and CPA disagreed, and so do we. The London Office Policy Review<sup>23</sup> provides a far more systematic review of market conditions. As one of several pertinent passages, paragraph 2.36 states: "In the West End availability fell from 6.4% to 5.4% during 2006 with headline rents increasing by 22% to £890 per sq m, more than twice the rate of increase in 2005. It is worth noting that the West End shows a clear long-term upward trend in rents over the past twenty years, and despite ebbs and flows of supply, there is little evidence that this is set to change in the foreseeable future. The market remains highly supply constrained."

---

<sup>23</sup> London Office Policy Review, Mayor of London, 2007. CDL-LW083

5.68. It is difficult to imagine a stronger policy endorsement. As the policy recognises there are challenges creating new office space in this part of London, with its concentration of valued heritage, but we see nothing to fault in a call for high quality, complementary designs. Each individual proposal would, of course, have to be assessed on its merits. Finally, and perhaps less welcome to business interests, we see nothing wrong in the aim, qualified as it is, to obtain housing in mixed use office developments where this can be achieved. We see no reason to recommend changes to Policy 5G.5.

### *Tall Buildings*

5.69. A number of parties described the FALP as overly enthusiastic in the support of tall buildings, both generally and with reference to the CAZ and OAs. The Forum argued that tall buildings are not a strategic issue and suggested that all references to them should be deleted. Westminster agreed and referred to the 2003 Panel report, at paragraph 2.9, as one of several criticisms of the unjustified and unnecessary nature of tall buildings. The Mayor disagreed with both points and saw support for his position in Recommendation R2.36 of the 2003 Panel Report.

5.70. We can see little material change in the FALP compared with the 2004 Plan. Policy 2A.2 Opportunity Areas, introduces a new clause to: “Deliver good design, including public realm, open space and, where appropriate, tall buildings.” However, Policy 4B.8 on the location of tall buildings has not been materially changed and nor has 4B.9: Large scale buildings – design and impact. The 2003 Panel’s reservation was against the concept of a ‘promotional’ policy for tall buildings. However, the *locational* Policy 4B.8, rolled forward from the 2004 Plan, remains very much in line with that Panel’s recommendation. We recommend just one change (Recommendation 6.2) to take account of recent CABE/English Heritage guidance.

5.71. FALP paragraph 5.190 is new: “Scarce development capacity, high public transport accessibility and opportunities for environmental enhancement make parts of CAZ particularly suitable for good quality tall buildings, subject to policies in Chapter 4B and SPG on the View Management Framework. Locations suitable for such buildings include parts of the City and many of the CAZ Opportunity and Intensification Areas indicated elsewhere in this chapter of this plan.” However, paragraph 191 may be compared with paragraph 5.27 in the 2004 Plan. Both include: “To<sup>24</sup> make the best use of land and existing infrastructure, developments should maximise density. Subject to other policies in this plan, in locations with high public transport accessibility and capacity, broad area densities approximating to plot ratios of at least 4.5:1 may be appropriate, for example in Opportunity Areas. More local site densities could be considerably higher, especially in areas where tall buildings will be encouraged.”

---

<sup>24</sup> “In order to ...” in the 2004 Plan.

5.72. Proposals for tall buildings, both in principle and for particular schemes, are generally controversial, with protagonists on each side. The Mayor is known for his generally positive stand-point, however the policy configuration has not we think been greatly changed by the FALP, indeed in some ways paragraph 190 highlights qualifications to their potential locations. Whether any particular OA should be seen as potentially suitable – the FALP identifies more than did the 2004 Plan – is an important consideration in the processes to produce Frameworks and/or DPDs for those locations. We reflect on the processes below but see no basis for recommending a change in the policies for tall buildings.

### **World Heritage Sites**

5.73. Policy 4B.13: World Heritage Sites, was little altered by the FALP but even so the wording has been subject to a number of representations, particularly by GOL. Prior to and during the Examination (BN5 & BN22), the Mayor suggested changes to stiffen the degree of protection. A number of parties, especially those whose main interests lie with the BRN, wanted more radical changes to the Plan but we see the revised policy, incorporating the changes pressed by GOL, as offering a sound level of protection.

#### **Recommendation 5.8**

We recommend that Policy 4B.13 read: “The Mayor will work with the relevant Boroughs, English Heritage, and site owners and occupiers to agree and to implement management plans for London’s World Heritage Sites. DPDs and management plans should contain policies that protect their historic significance and safeguard and, where appropriate, enhance their settings. In considering planning applications the Mayor will, and Boroughs must, take account of and give appropriate weight to the provisions of World Heritage Site Management Plans.”

### **Town Centres**

#### *Polycentricity*

5.74. Policy 2A.5: Town Centres, retains from the 2004 Plan a broad aim “to implement a polycentric strategy for London”. A number of Participants, including the Forum, LCF, CGCA and others said that this is poorly developed by the FALP, with undue emphasis on the CAZ. Others, such as the London First and WPOA/CPA, took the opposite view.

5.75. It seems to us that the differences are partly about perceptions of what is meant, or ought to be meant, by polycentric development in the London context. One interpretation evidently equates the term with dispersed centres, in the very broadest sense similar to one another in their range of businesses and other activities. At risk of over-simplification we might label these as a series of small scale versions of the CAZ.

5.76. However, we agree with the interpretation in “Outer London: Issues for the London Plan”, paragraph 3.47, that the concept should be seen as one which “supposes that each level in the settlement hierarchy will perform the role most appropriate to it and the distribution of growth at each level should support more cohesive development.” We note the academic references that supported this statement. In other words the aim is to support outer town centres to fulfil that role – ie as outer town centres – rather than to attempt to emulate on a smaller scale the range of activities found in the CAZ.

5.77. On this approach, which we think must be the right one for London, the FALP does indeed support a polycentric pattern of development in its support for Town Centres in their own right. There was, however, a measure of agreement at the EiP that the Plan could do more in this regard, particularly to recognise the connectivity between London’s outer Town Centres with localities beyond the outer London boundary including those in the growth corridors. In their responses to the FALP, South London Boroughs in particular had stressed such points with regard to centres such as Croydon, Bromley and Kingston. London Councils, supported by the Assembly, urged a stronger link between Policy 2A.5 and, amongst others, Policies 1.2 and 1.3 on cross regional working and the growth corridors. The Mayor explained that the greater emphasis on cross regional working in Chapter 1, and his role on the Inter-Regional Forum, illustrated the priority he attached to this wider approach. And in order to strengthen the Plan’s approach to polycentricity more generally he suggested the changes we now endorse.

#### **Recommendation 5.9**

We recommend that paragraphs 1.24 and 3.220 be expanded to include: “a polycentric network of centres and of different scales throughout London should identify capacity to meet anticipated demand appropriate to it and that the distribution of growth at each level should support more cohesive and sustainable development.”

5.78. Beyond that, however, as London First pointed out, there is nothing in the FALP that actively deters large offices, for example, locating in London’s outer Town Centres. Some do, and North London Strategic Alliance (NLSA) gave examples. But there is no evidence to suggest that a policy actively seeking to disperse global world city type activities away from the CAZ would achieve more than lose them to London altogether. Quite simply, also, although many Participants raised concerns, or sought measures that are not realistically open to the Mayor – such as the resurrection of skilled factory based employment – no one was able to suggest a coherent and realisable alternative strategy to that in the FALP. We recommend no changes to the FALP in these regards other than that above.

*Policies for the Town Centres*

5.79. Policies 2A.5 and 3D.1-3 address the Town Centres; the network is defined in Annex 1, and there are further references contained within the sub regional proposals in Chapter 5. None of these is new but they are subject to change in the FALP.

5.80. Before turning to more detailed considerations, several Participants, notably GOL, London Councils, ALBPO and the Forum argued that the overall approach was simply too descriptive of what exists today. Aside from Brent Cross (paragraph 5.53) and Stratford (paragraph 5.95) they saw the FALP as failing to provide future vision and strategy for London's Town Centres and also failing to identify Town Centre locations for significant office provision, in accordance with PPS6 paragraphs 2.12 et seq and 2.39. Too much was seen as being left to SRDFs (or SRIFs – see Chapter 4) that ought to be in the Plan. The Plan gives inadequate guidance to Boroughs preparing their DPDs.

5.81. The Mayor was sympathetic to this line of criticism and responded with BN23, suggesting potential modifications to the FALP if we so advise. We readily accept that BN23 at least points towards the types of additional guidance that should, in an ideal world, have been incorporated by now in the London Plan, either in the FALP or earlier. However, we also recognise the strength of the Mayor's caveats, also in BN23, about doing so at present.

5.82. First, data underpinning the putative further guidance need updating. We are pleased to note the Mayor's assurance that he proposes to do so. Second, and crucially, this guidance was not available for comment during the FALP consultation stage. These are potentially significant modifications, affecting the futures of individual Town Centres. The affected Boroughs, commercial interests, community groups and many individuals would have a proper expectation to be able to see and comment on what is being suggested prior to its inclusion in a statutory plan. It would be wrong to proceed without that opportunity. Third, there would be a risk of unintentionally depressing investment in a Town Centre omitted from what would unavoidably be an incomplete list of those earmarked for growth. Greenwich has raised precisely this objection (BN42). Tesco have made several positive suggestions for inclusion (BN53) but acknowledge the desirability of consulting all Boroughs. Although we are conscious that GOL remains unconvinced (BN39), we make no recommendation to modify the FALP in line with BN23 but see a clear need to address the issues raised at the earliest opportunity in future reviews of the Plan.

**Recommendation 5.10**

We recommend that an early review of the London Plan gives greater strategic guidance on the future direction envisaged for each higher order Town Centre, including their possible potential for significant office development.

*Aspirational Town Centres and future reclassifications*

5.83. In somewhat similar vein, a number of parties, including Hammersmith & Fulham with respect to White City/Shepherds Bush and Standard Life with respect to Gallions Reach, argued that the FALP should make provision now for reclassifying ‘aspirational’ centres upwards in the hierarchy in anticipation of firmly programmed future expansion plans.

5.84. We note first that the FALP do not materially alter the process from that established in the 2004 Plan. “A centre’s role should be tested through regular ‘health checks’ and centres can be reclassified in the light of these through Sub-Regional Development Frameworks [SRDFs/SRIFs] and subsequent reviews or alterations to this Plan and DPDs. This process should ensure that the network is sufficiently flexible to accommodate change in the role of centres and their relationships to one another.”<sup>25</sup>

5.85. We see this as remaining the most appropriate process, and consistent with PPS6 paragraph 2.10. It is the recurring London-wide Town Centre Health Checks that provide a comprehensive and consistent review of all Centres and, as has been so with the FALP, should be the trigger for changes to the hierarchy in the strategic Plan. Pending future reviews of the Plan, the Mayor undertook to look pragmatically and flexibly at classifications proposed in DPDs and not to seek ‘conformity’ with the Plan if circumstances warrant something different.

*Out of centre retailing*

5.86. Policy 3D.2: Town Centre Development, includes clauses relating to edge of centre and out of centre developments, existing or proposed, supported by text at paragraphs 2.16i and 3.228. A number of respondents questioned whether, especially, 2.16i goes beyond Government policy in PPS6 in its opposition to out of centre proposals. We do not think so, and neither did GOL. Paragraph 3.228 does no more than express support for the sequential test in Government guidance, while 2.16i adds an additional reason for doing so by asserting that “Out of centre, largely car based developments conflict with the development of London as an ‘exemplary sustainable world city’ and a ‘low carbon emissions city’.” Nowhere do the FALP seek to introduce an absolute prohibition on out of centre developments, and we see nothing to criticise in its approach.

5.87. GOL queried why the Mayor, paragraph 3.228, intends to issue SPG on retail needs assessment. We were satisfied, and gained the impression that GOL was too, with the response that this will complement PPS6, without duplication or inconsistency, to take account of the unique circumstances of London.

---

<sup>25</sup> FALP paragraph 3.227.



*Section 106 agreements and community benefits*

5.88. London Tenants Federation (LTF) and Haringey Federation of Residents Associations (HFRA) referred to what they described as extreme pressures on local authorities to accept developments in Town Centres relying on S106 Agreements to offset harmful social impacts. The organisations argued that all too often S106 contributions do not, or for want of available land, cannot, provide social and community infrastructure; funds are instead diverted into local authorities' general budgets. Policies such as 3D.1 cannot be correctly implemented without the revenue funding to maintain and provide local services and facilities.

5.89. LDA explained that its programmes and initiatives aim at addressing the types of issues raised, and specifically gave examples where it has been involved in partnership working in Haringey at Haringey Heartlands and Tottenham Hale. In a subsequent response (BN40) NLSA argued that, as illustrated by an extract from Haringey's Annual Monitoring Report on S106 contributions, the wider aims of the London Plan are not being frustrated in that Borough.

5.90. We are not sure that this altogether counters the LTF/HFRA point, which is specifically concerned with the extent to which contributions are being used, or not used, to benefit the local communities most directly affected by the developments. This issue was cogently described, but we have to recognise that these are matters primarily for implementation by the Boroughs – S106 Agreements are between the developer and local authority – and that there is also a legal framework to their scope. As the Mayor said, there is only so much that the Plan can prescribe, and Policies 6A.4 and 6A.5 set a clear strategic steer regarding planning obligations. He also made the fair point that, despite policies seeking higher densities, only some 4% of development in London is now (2005-06) on greenfield land. We are conscious that LTF and HFRA will not feel that they have achieved much on this but it falls within the category of issues on which the Panel can do no more than record the point with some understanding but no evident means of assisting.

*Specific Town Centres*

5.91. FALP Annex 1 reclassifies Uxbridge Town Centre upwards in the hierarchy from Major to Metropolitan and Canary Wharf upwards from District to Major. These changes attracted little controversy (separate from the issue of whether Canary Wharf should be in the CAZ) and both are fully justified by the London-wide Town Centre Health Checks 2006 Analysis<sup>26</sup>. The other Alterations concerned reclassifications to CAZ Frontages, consequential to the Zone's enlargement, which we referred to above at paragraph 5.46 – 5.49.

---

<sup>26</sup> London-wide Town Centre Health Checks 2006 Analysis, Mayor of London, 2007. CDL-LW063

5.92. On a seemingly small point, the designation for what we have termed ‘Canary Wharf’, varies within the FALP and BN23 between ‘Isle of Dogs’ and ‘Canary Wharf’. We agree with the desire by the operators, Canary Wharf Group plc, for this Centre to be referred to in the London Plan by its own widely used name, Canary Wharf, rather than its geographic locality. This is much the same approach as that taken in the Plan with respect to other Centres with their own distinctive name such as Nag’s Head, Baker’s Arms or Brent Cross.

**Recommendation 5.11**

We recommend the name “Canary Wharf” in preference to “Isle of Dogs” for that Centre.

**Outer London - and the ‘suburbs’***Geographic definition*

5.93. There is no clear cut boundary subdividing London; as London Councils and the Forum amongst others stressed, individual Boroughs vary considerably within their own boundaries. Nor does the London Plan or its Further Alterations include locational policies applicable only to outer (or indeed inner) London. FALP Policy 2A.6 expressly refers to support for sustainable communities in suburban areas of both inner and outer London, something reflected also in paragraph 2.24 with its reference to the URBED: “Tomorrow’s Suburbs: Tools for Making London More Sustainable”<sup>27</sup>.

5.94. However, as a strategic overview, and to enable statistical data to be compared on a consistent basis, it is useful to have a broad definition of what constitutes ‘Outer London’. Outer London: Issues for the London Plan, adopted a definition comprising 19 Boroughs: these are those so defined by Government for grant purposes, excluding Newham which is seen as having increasingly inner London characteristics. There was considerable debate about this. Haringey’s inclusion in the 19 outer Boroughs was questioned, and contrasted with Newham’s exclusion, and the Mayor mentioned that the characteristics of Greenwich might be on the margin between the two classifications. We also heard suggestions for cross referencing to other parts of the Plan, such as the density matrix (GOL & NLSA) and to other documents such as the Town Centre Health Checks (the Forum), but above all a general recognition that Boroughs’ DPDs may well include a finer grained definition.

5.95. The Mayor saw support in the Ward Atlas for London<sup>28</sup> for his broadly based definition. He asserted that its data confirm that, in the round, these 19 Boroughs share broadly similar statistical characteristics as set out in “Outer

<sup>27</sup> Tomorrow’s suburbs Best Practice Guide: Tools for making London more sustainable, URBED for GLA, LDA, ALG and TfL, 2006.

<sup>28</sup> 2001 Census London Ward Atlas, Mayor of London, 2007.

London: Issues for the London Plan” at paragraph 1.2. We have since taken up the Mayor’s offer to provide us with the Atlas. It contains a mass of detailed information, by no means straightforward to review manually and, of course, there are Boroughs that fall on the margins. Broadly, however, our analysis confirms the Mayor’s proposition that, compared with the more central Boroughs, the populations of the 19 Boroughs move less often, fewer live alone and more are of retirement age. The health comparison we found less clear cut, but overall we agree that residents in the 19 Boroughs enjoy better health than those living more centrally, and certainly on this comparison Haringey shares the outer London profile. We found the education and economic activity comparisons more tenuous, with perhaps a more noticeable distinction between west and east London than inner and outer, west being higher than east on both measures.

5.96. Taken in the round, however, we have found no reason to disagree with the Mayor’s broadly based definition as the best available. In line with BN22 we endorse making this definition of the ‘suburbs’ explicit in the FALP, bearing in mind that this by no means implies that there are policies exclusive to these Boroughs alone. We will add the rider discussed as the EiP to recognise that Boroughs may wish to include finer grained definitions in DPDs.



© Crown copyright. All rights reserved. Greater London Authority 100032379 (2007)

*Fig 5.1 Inner and Outer London*<sup>29</sup>

<sup>29</sup> Outer London: Issues for the London Plan, Mayor of London, 2007, p 4. CDL-LW082

**Recommendation 5.12**

That paragraph 2.18i be amended, with footnotes, by adding: "19<sub>1</sub> Outer London Boroughs possess a strong set of common suburban characteristics<sub>2</sub>. Policy 2A.6 is particularly applicable to these but can also be appropriate in parts of Inner London. Boroughs may wish to include finer grained definitions of 'the suburbs' in DPDs. "

<sup>1</sup> Barnet, Barking & Dagenham, Bexley, Bromley, Brent, Croydon, Ealing, Enfield, Haringey, Havering, Harrow, Hillingdon, Hounslow, Kingston, Merton, Redbridge, Richmond, Sutton, Waltham Forest.

<sup>2</sup> Thompson R Outer London: Issues for the London Plan. GLA 2007"

*London's suburban economy*

5.97. London Councils, the London Assembly and others expressed concern that the FALP foresee this extensive area as essentially a dormitory, overly dependent on personal services for employment, and suffering relative if not absolute economic decline coupled with increasing social pressures.

5.98. Such fears are understandable. Central London continues its economic dynamism, attracting younger residents to live on its fringes in Inner London, while Outer London has experienced a decline in manufacturing and a legacy of dated office accommodation for which there is sluggish demand. These powerful trends are common to many large cities in countries with mature economies.

5.99. We have expressed the view above that large international companies are most unlikely to be persuaded to relocate major offices outside of the CAZ and Canary Wharf, except to a limited extent in the vicinity of Heathrow or just possibly at Croydon. It would be counter productive for the FALP to forecast over-optimistic investment levels in Outer London, not supported by trends or other evidence.

5.100. In any event, the economic outlook is very far from bleak. Over the 20 years to 2006 employment in Outer London increased by nearly 6%; over the 20 years to 2026 it is forecast to grow by nearly 11%, almost twice the previous rate<sup>30</sup>. These past and forecast rates of growth are well below those for Inner London, including or excluding the CAZ and Canary Wharf, and lower too than the equivalent figures for the Outer Metropolitan Area (OMA) beyond London. However, we do not accept the depiction by GOL and others of an 'employment trough' in the Outer London economy; merely that the rate of growth there will be less than further in or further out. All told some 170,000 new jobs are projected in Outer London to 2026, about 57% of the London-wide projections over the Plan period.

<sup>30</sup> Mayor's oral evidence and Outer London: Issues for the London Plan, Mayor of London, 2007, Annexes 3 and 4. CDL-LW082

5.101. We accept also that the FALP rightly look to job opportunities for Outer London residents to arise, locally, from residential development, much of it in small and medium sized enterprises, and a restructured office market. Key growth locations are the Outer London Town Centres and ten OAs. As the London Office Policy Review 2007<sup>31</sup> reveals, although in aggregate the OMA achieved significantly more employment growth than Outer London over the last economic cycle, only relatively modest growth was achieved in many individual OMA centres. Only Reading, Wokingham and Bracknell Forest grew by more than 10,000 jobs, each less than Barnet (23,000) and Richmond (16,000).

5.102. Barnet, which played an active part at the EiP, is one of three case studies in “Outer London: Issues for the London Plan.” The Borough demonstrates how a spatial strategy running with the grain of the London Plan can lead to sustainable growth, generating revenues for priority services. The other two Boroughs were Sutton, a generally affluent Borough where innovative ‘green’ policies have been to the fore, and Barking & Dagenham where the emphasis has necessarily been on social and economic regeneration – particularly in the aftermath of losing the Ford Motor Company. It would be wrong to paint too rosy a picture but equally there is plenty of evidence of potential in Outer London given a positive will. We should add that there are doubtless other examples.

5.103. Much of London’s projected employment growth is in the business services sector, with rather over 0.5 million new jobs projected by 2026. Many Outer London residents – who are on average better qualified than those of Inner London – are well equipped and placed to benefit from employment opportunities supported by improved accessibility into the centre and outwards beyond London’s boundary. As outlined above, the investment programme sought by TfL would essentially align increasing public transport capacity with projected future demand. As at 2001 something like one third of Outer London residents worked in Inner London and approaching a tenth outside London, this latter having roughly doubled over the previous 20 years. This pattern looks set to continue, and although it involves increased travel, some 85 – 90 % is projected to be by public transport.

5.104. As we have accepted above, ‘More residents, more jobs?’ sets out a clear and persuasive analysis demonstrating that, on average, a population increase of 1,000 creates about 230 new jobs. Nor should these be depicted as necessarily low skilled and poorly paid: they are likely to include a wide range of positions in, for example, the health services, education and public administration as well as opportunities for the self employed.

#### *Disadvantaged communities*

5.105. FoE, LCF (see also BN47) and others questioned whether these various patterns of employment fulfil the needs of individuals who for one reason or

---

<sup>31</sup> London Office Policy Review, Mayor of London, 2007. CDL-LW083

another are hampered in their ability to commute or to work in the business sector. LTF raised similar concerns regarding the types of jobs created at Canary Wharf, and the issues are not altogether dissimilar from those raised with regard to ‘gentrification’ on the fringes of the CAZ.

5.106. These are profoundly important societal issues. There can be no doubting the barriers to work faced by less advantaged individuals and communities adapting to changing employment prospects, not least those stemming from the run-down in traditional manufacturing in suburban factories. Commuting, for example, is not necessarily an affordable and practical option for lower paid jobs or for individuals with family caring responsibilities. These matters are explored well in the Sustainability Appraisal<sup>32</sup> at Section 5.7 on economic development and in particular at 5.7.2 onwards under the sub heading “Good job/Bad job”.

5.107. However, we do not see what more, at a strategic spatial level, the London Plan could do to help than it does already. The Preamble and Introduction paragraphs xix and xx (unaltered by the FALP), recognise difficulties in tackling social exclusion and deprivation from past regeneration initiatives. As these paragraphs also recognise there is no single policy answer and the Plan is but one part of an integrated approach, not just to economic growth but to complementary programmes, for example the LDA outlined to the EiP its Area Projects and Skills Programmes, and Barnet described the Borough’s successful ‘Three Strands’ approach. As the Mayor said to us, there is nothing in the Plan to deter the retention or creation of more traditional forms of manufacturing employment, but it is not within his powers to create such businesses or change the underlying direction of the economy. Aside from recording the points, and highlighting their importance, we see no useful recommendation for change to the FALP that we could make.

#### *Suburban Heartlands*

5.108. As something of a counterpart to our preceding considerations, several parties, including Enfield and Barnet, sought policies to protect ‘traditional suburban heartlands’; characterised as low density, leafy, good quality residential neighbourhoods, but seen as threatened by insensitive higher density infilling within gardens or by replacing existing houses with flats. Barnet argued that the availability of safeguarded high quality housing is a factor influencing global companies to locate in London.

5.109. We note that the 2004 Plan paragraph 2.24 did make a passing reference to ‘heartlands’, and that Outer London: Issues for the London Plan (paragraph 3.39) suggests that the FALP could “more clearly reflect the need to protect the more traditional ‘heartlands’ from excessive and inappropriate intensification.” This was not pursued by the Mayor at the EiP.

---

<sup>32</sup> Sustainability Appraisal of the Draft Further Alterations to the London Plan, Ben Case Associates for Mayor of London, September 2006; reissued April 2007. CDL-LW052

5.110. Beyond the best practice guidance already published by the Mayor we see no case for anything along the line of a ‘suburban heartlands protection’ policy. London has to accommodate close to 1 million more residents over the next 20 years, and it would be unsustainable and inequitable for the Mayor in some way to privilege particular suburbs by, in effect, exempting them from contributing to meeting the capital’s future housing needs.

5.111. The FALP density matrix is based on a locality’s overall character and is supported by a raft of generic policies regarding development quality, which can be amplified in Borough UDPs or DPDs. PPS<sup>33</sup> nationally, while encouraging the efficient use of land offers no carte blanche to harmful infilling, the aim at paragraph 16 and elsewhere is to achieve high quality housing. There will be an additional level of consideration if the form and character of a ‘heartlands’ suburb has warranted Conservation Area status. In all, we make no recommendation regarding a heartlands policy.

### **Opportunity Areas, Areas for Intensification & Areas for Regeneration (OAs, AfIs & AfRs)**

#### *The Policies*

5.112. Policy 2A.2: Opportunity Areas, sets the Mayor’s broad strategy towards 28 identified OAs. Paragraph 2.8 sets out the basis for their identification; they are listed with the AfIs immediately following the Policy; Map 2A.1 indicates their locations; and the sub regional policies and tables in Chapter 5 outline the respective land areas, together with indicative employment capacities and minimum homes target to 2026. Both these figures are acknowledged as possibly dependent on achieving increased transport capacity to serve the levels of growth envisaged.

5.113. These aspects of the FALP are based on equivalent provisions in the 2004 Plan, but subject to material Alterations, including to the list of localities identified, and our consideration is of these Alterations.

5.114. The identification criteria for OAs, in paragraph 2.8, are little changed. They remain localities seen as being “capable of accommodating substantial new jobs or homes and their potential should be maximised. Typically, each can accommodate at least 5,000 jobs or 2,500 homes or a mix of the two, together with appropriate provision of other uses such as local shops, leisure facilities and schools” to which the FALP has added “health and social care facilities and services”. This is hardly controversial and does we think respond, to the extent that a strategic plan is able, to concerns that housing growth might proceed without commensurate social infrastructure, albeit that this provision will generally be for other agencies. The paragraph concludes by adding a sentence to

---

<sup>33</sup> Planning Policy Statement 3: Housing, DCLG, 2006. CDL-CG028

the effect that the scale of change in OAs offers particular potential for Climate Change measures. Again this should not be controversial.

5.115. The nine AfIs remain subject to Policy 2A.3, which is not significantly changed by the FALP, and neither is their description in paragraph 2.9. “These areas have significant potential for increases in residential, employment and other uses through development or redevelopment of available sites and exploitation of potential for regeneration, through higher densities and more mixed and intensive use ...”. Unlike the OAs the Plan does not describe a typical capacity range for what is envisaged but, as may be expected, on the whole the Chapter 5 tables show lower figures compared with the OAs. The only significant change introduced by the FALP is in those AfIs that are reclassified as OAs, and it was on the OAs that the debate centred.

5.116. The swathes of London defined as AfR remain subject to Policy 2A.4, which again is little changed by the FALP. The areas have been aligned with the Government’s Index of Deprivation based on the 20% most deprived wards. Understandably a number of Participants questioned whether sufficient is being done to address inequality and social exclusion, but the FALP strengthens the London Plan’s strategic aims somewhat, and we recognise that in most regards realising these aims relies on other agencies. The timescale – “within 5-10 years” – for ending serious disadvantage stemming from where someone lives was decried in some responses to the FALP for being unduly long. Although we understand the feelings behind this criticism, the timescale is a Government objective which the Mayor supports but has not set. The FALP simply updates the Plan in this regard. What is important to note, as the Mayor pointed out, are the potential opportunities offered by the geographical proximity of a number of the OAs and AfIs to the AfRs. We think that this is an important point and one that needs to be borne in mind when looking at the scale of additional homes and jobs envisaged for the OAs in particular.

#### *Opportunity Areas – The processes and outcomes*

5.117. The process and outcomes associated with the OAs were strongly criticised, generally and with respect to particular OAs, most vehemently by the CGCA with respect to Tottenham Court Road OA but also more temperately, broadly and persuasively by others, including the Charlotte Street Association, the Forum, London Civic Forum (LCF) and Boroughs including Westminster, Hammersmith & Fulham and (in writing) Camden. There was less criticism, in the main support, from others including London First, ALBPO, NLSA, Tesco and Barnet.

5.118. Digressing momentarily from our main theme, we also record HA’s complaint on not being consulted regarding the OAs, but also the robust responses from ALBPO as well as the Mayor regarding the current approach to planning in London. This aims to minimise the need for car travel rather than cater for its growth, backed by an investment programme in public transport. And, as we have



noted, the growth set out in the Chapter 5 tables expressly acknowledge its partial dependency on increased public transport provision. Aside from noting the Mayor's undertaking to consult HA on individual proposals which raised highway issues, we will leave this matter there.

5.119. Reverting to the main debate, some of the criticism seemed to be selective, rather than looking at the Plan in the round. For example, CGCA were acerbic about the omission in the FALP of the aim in the 2004 Policy 5B.1 (for Central London generally) to "ensure social and community infrastructure is retained, enhanced and expanded where needed" when that aim is in essence now encapsulated in Policy 5G.5 and more generally in Chapter 3A, in particular Policy 3A.15. Similarly, CGCA treated the word "enhanced" in Policy 5G.2 as synonymous with the growth of night time activities in Covent Garden and Soho, whereas the policy refers to "enhance and manage" – and not just at Covent Garden/Soho – and is supplemented by the Mayor's SPG.

5.120. We could continue but will settle for mentioning that the Panel found no difficulty navigating the Mayor's website to the Indicative Plan of the Tottenham Court Road OA (then AFI) claimed by CGCA to be inaccessible to the public; it is within the Central SRDF published in May 2006, which was available also in paper format.

5.121. Even so, we have some disquiet regarding the FALP. Continuing with the Tottenham Court Road area, as an example, this was an AFI in the 2004 Plan extending to some 10 ha with an estimated additional employment capacity of 2,000 jobs and a minimum of an additional 200 homes. In the FALP, the equivalent figures are 19 ha, 5,000 jobs and 1,000 homes with redesignation as an OA, which in itself is consistent with the increased scale of provision envisaged.

5.122. We do not suggest that the increases are necessarily or even likely to be inappropriate: the additional area intrinsically offers increased capacity as does the longer period covered. What was 2001 – 2016 is now 2001 – 2026 and the growth figures are, as we have mentioned, contingent on the possible need for increased transport capacity. No such contingency was flagged up for the lower figures in the equivalent tables in the 2004 Plan. At Tottenham Court Road, the SRDF expressly refers to dependency on Crossrail 1, as does paragraph 5.36 in the FALP. Indeed paragraph 5.36, in its reference to "significant opportunities to improve the public realm ...", does counter some of the criticisms directed at the Mayor with regard to this locality. (We have above endorsed deleting reference to an International Convention Centre in paragraph 5.65).

5.123. Equally, however, we have been unable to confirm that the figures are necessarily robust, notwithstanding some further explanation in BN28. We note the scenario planning and recognise the strategic long term nature of the figures. But the transition from the 2004 Plan to FALP via the SRDF seems less than transparent. Worryingly, in what is intended to be an exercise of "genuine

partnership<sup>34</sup>” Camden has objected<sup>35</sup> to the AO and Afl changes in its Borough “as there is no clear justification or rationale given” and “of particular concern” (along with the Euston Area) is Tottenham Court Road where the increases are described as “without any apparent justification or consideration as to the capacity for such growth or the impact of this growth on the existing urban form and character”. Westminster (the area straddles the Boroughs) is less critical, at least on this topic, but cautious and questioning about what is proposed<sup>36</sup>. English Heritage (EH) was concerned whether sufficient attention was being given generally to environmental capacity at OAs, AIs and Afls.

5.124. We could describe broadly similar concerns elsewhere, such as those from Hammersmith & Fulham with respect to White City OA, where the Borough said that it had objected to the SRDF. (We look again at White City below with respect to SILs). Barnet, generally supportive of the approach, nonetheless queried the housing figure for Mill Hill East Afl.

5.125. The main point we see has less to do with individual land areas and levels of growth – which we are in no position to determine – but with how these should be treated: what is their status? The employment figures are described as “indicative”, the housing as “minimum” and boundaries in the SRDFs are likewise described “emerging” or “indicative” – so that the extents too are not finalised. As pointed out by the Forum, the Sub Regional strategic priorities (Policy 5B.1, 5C.1 etc) aim to “optimise the development of Opportunity Areas and Areas for Intensification” while the OA Policies (5B.2, 5C.2 etc) seek to “maximise residential and non-residential densities” and the Afl Policies (5B.3 etc) refer to “higher levels of provision wherever possible”.

5.126. We see the dilemma. The OAs and Afls are vital to London’s housing and employment needs and, whereas at the Town Centres the Mayor was criticised for being too descriptive, here several parties saw him as unduly prescriptive. As we see it, the Mayor has to give a strategic steer – probably something of a push – in order to achieve London-wide housing and employment aims. As London Councils said, the figures are snapshots during SRDF drafting, but as the Mayor replied, so too would be any revised figures. He undertook to recognise this in any issue of ‘conformity’ between the Plan and Boroughs’ DPDs.

5.127. On balance, we do not agree with the suggestion by Hammersmith & Fulham, and others, that numerical data should be omitted because it might preempt LDFs and perhaps development control decisions. The principle of setting out figures was established in the 2004 Plan, not inaugurated by the FALP, and in any event we can see benefits from the Plan giving a broad indication on levels of growth. Cumulatively, what is achieved at each OA will determine whether the overall London-wide strategic aims are met.

---

<sup>34</sup> See in the Introduction to all the Sub-Regional Development Frameworks, Mayor of London, 2006. CDL-053-057

<sup>35</sup> Written Statement, London Borough of Camden, 18 May 2007.

<sup>36</sup> Westminster City Council response to the Draft FALP p 13.

5.128. At White City, which is Hammersmith & Fulham's principal concern, the Mayor has undertaken to discuss the figures further with the Borough prior to final publication of the Further Altered Plan. We welcome that, and more generally see that the key to success lies in the process followed. We do not see how we could sensibly recommend what the detailed outcome of those discussions should be in the manner raised by the Borough in BN45, but we lean towards the view that it is for the Mayor to demonstrate the case for changing the figures from those in the 2004 Plan. (We look again below at White City with respect to Strategic Industrial Land).

5.129. In Chapter 4 we endorsed SRDFs being recast as Sub Regional Implementation Frameworks (SRIFs) for the new Sub Regions and that these, and SPG for the CAZ, would signpost, rather than include, policies for the OAs/AfIs. The FALP, paragraph 2.8, introduces a distinction between the "refining" role of SRDFs (now SRIFs) and "defining" role of DPDs in setting detailed boundaries and policies for individual OAs. We believe that this is an important step in the right direction.

5.130. An Alteration to the head paragraph of Policy 2A.2 is subtle and perhaps telling. The 2004 version says that "the Mayor will work with strategic partners to prepare planning frameworks" for OAs. The FALP asks that "strategic partners work with the Mayor to prepare, and then implement, spatial planning frameworks ..." or (unchanged in the FALP) "to build on frameworks already developed. These frameworks will set out a sustainable development programme for each OA, to be reflected in DPDs, so as to contribute to the overall strategy of the London Plan" including, amongst several other aims, to "seek to exceed the minimum guidelines for housing having regard to indicative estimates of employment set out in the sub regional tables", that is to say the figures such as those we have referred to above.

5.131. However, the several other aims, retained or introduced by the FALP, include maximising access by public transport; promoting social and economic inclusion and relating development to the surrounding areas, especially any nearby AfRs; taking account of the community, environmental and other distinctive local characteristics; delivering good design, including public realm, open space and, where appropriate, tall buildings; and coordination across Borough boundaries.

5.132. The extent to which Spatial Frameworks will be beneficial, sitting between the Plan and Boroughs' DPDs, is likely to vary, but these are key locations subject to change; we recognise that the Mayor will wish to help shape them by leading on the Frameworks. There may well be tensions between strategic imperatives – for houses and jobs – and local interests concerned with conserving what is rightly valued. But read as a whole (and we looked above at policies on tall buildings) the package of aims in Policy 2A.2 addresses, so far as a strategic plan can do so, many of the concerns and has been strengthened by the FALP. We can record the Mayor's confirmation that the figures in the FALP are indeed indicative – they

could go up or down in practice – albeit that he wishes to ‘maximise’ what can be achieved.

5.133. We think that it is a misreading of the FALP (or indeed the 2004 Plan) to equate – as some sought to do – the word ‘maximise’ as meaning ‘maximise regardless’. We see the ‘optimum’ as the maximum achievable consistent with the other aims. Viewed this way, as surely it should be, we do not see the Chapter 5 OA tables as a threat but as vital contributions to London’s undoubted need for homes and jobs. We return to the question of ‘maximise or optimise’ in Chapter 6 (paragraph 6.23) as an aspect of housing provision.

5.134. There will be debate and disagreements about individual areas and proposals – there frequently is in planning and the outcome can be the better, though sometimes the worse, for it. And Boroughs do evidently sometimes permit schemes, perhaps for good reasons, that appear outside elements of the Plan such as on plot ratios at paragraph 4.44. Not every outcome is attributable to the Plan.

5.135. We do not intend to make any formal recommendation on these matters; subject to noting that the detailed figures are not set in stone we endorse the approach to the OAs and Afls. What cannot be overstated, though, is the importance of open and collaborative working. From what we have seen this has been less than successful, to put it no stronger, for at least a number of the areas. We will not speculate why, but can only urge all concerned to work together so that the process can indeed constructively inform Boroughs’ DPDs and, more crucially, what results on the ground.

#### *CAZ peripheral OAs*

5.136. We endorsed above the principle of unambiguously including the ‘peripheral’ OAs within an enlarged CAZ. But whether or not so defined, these localities are in any event geographically on the fringes of London’s central core. LCF, LTF and others raised issues regarding ‘gentrification’, in particular around Kings Cross and Elephant & Castle. Financially high value developments and unaffordable housing were described as displacing local communities and small enterprises. LTF in particular painted a graphic picture of changes at Elephant & Castle, where visually shabby architecture has provided affordable premises for small local, frequently BME, businesses now threatened by ‘regeneration’.

5.137. We understand the issues, which are by no means unique to these localities or indeed to London, and from the discussion we know that the Mayor too is aware of the dilemmas involved. It is not in London’s interest to retain outworn and underused swathes of the Capital, especially close to the centre, where they can provide a large number of new jobs and homes, far more than at present, close to areas of deprivation. The redevelopment at Kings Cross is advanced towards these ends, and the provision of affordable housing is the Mayor’s highest priority requirement for residential developments. All the same, the types of issues raised by LCF and LTF are important and difficult to address.

5.138. We were pleased to hear about the Mayor’s draft SPG on Planning for Equality and Diversity, which has been subject to consultation and is due for final publication imminently. However, beyond highlighting the points raised, we do not recommend changes to the FALP. The Plan includes a range of relevant measures already, and some of the remedies lie outside the Plan, for example in the LDA skills programmes.

#### *Olympic and Paralympic Games*

5.139. At paragraph 1.5 the Mayor foresees that “The Olympic and Paralympic Games will be a celebration of London’s diversity as well as an illustration of how the games can make a lasting contribution to the development of an exemplary sustainable world city.” Policy 5C.2<sup>37</sup> and supporting text takes this forward in similar positive terms as does 3D.5 with its supporting text regarding legacy sports facilities.

5.140. Not everyone shared this upbeat perception of the Games. LTF referred to a recent report<sup>38</sup> “Fair Play for Housing Rights: The Olympic Games and Forced Evictions – A study of seven past and future host cities” which, reflecting its title, is highly critical of the social impacts associated with Olympics Games. They sought amendments to 5C.2 to assess and address social impacts and ensure greater local benefits and community engagement, setting this within their more general call for the Plan to include a social justice framework which would ensure a better deal for local people. LCF reinforced the points, and in particular proposed an addition to 5C.2 to ensure that existing residents of Lower Lea Valley would benefit, including via jobs, from the Games’ construction and legacy. FoE likewise supported local people playing a substantial part in the development of the Games and their legacy, with access to the developed areas.

5.141. On somewhat different tacks, the Assembly saw a need to assist sports participation, and reiterated concerns to protect playing fields across London from development. NLSA saw a need for improved transport to serve the Games and legacy. London Thames Gateway Development Corporation (LTGDC) pursued aims to accrue gains arising from the Games and saw benefits in amending 5C.2 to ensure coordination with LTGDC and the Boroughs. The Forum sought additional cross referencing to other parts of the Plan and argued for an Opportunities Framework for the Games and legacy. Tesco saw the need for a more flexible approach to retail provision in the Stratford area.

5.142. We understand the feelings behind the environmental and social justice issues raised, but we do not see them as necessarily at odds with the FALP, for example at paragraph 5.70, which seek an Olympics legacy “designed and built in a way that guarantees its economic, social, health and environmental sustainability for the generations after 2012. It should also form an integral and integrated part

---

<sup>37</sup> An inconsequential printing error numbers this 3D.2 in the published FALP

<sup>38</sup> Published by The Centre for Housing and Human Rights and Evictions (COHRE).

of the regenerated wider Lower Lea Valley to meet the needs of the area's current and future communities ... a permanent, positive transformation for one of London's most neglected areas."

5.143. As land assembly and master planning for the Games are now well advanced, if not complete, we could in any event see little scope to amend the FALP in these regards. LDA explained that early versions of the Olympic and Paralympic *Legacy* Master Plan would not be complete until 2009. There is to be extensive consultation before then, with social issues factored in. We welcome this and also the Mayor's undertaking, which we record, to meet with the community organisations, outside of the EiP forum, to discuss the social and related issues. In Appendix B we also endorse (BN66) a stronger link between the London Plan and Legacy Master Plan.

5.144. On the more specific issues, without undervaluing playing fields, we see the point raised by the Assembly as peripheral to this aspect of the FALP and addressed at a strategic level by Policy 3D.7 and nationally by PPG17<sup>39</sup> paragraph 10. FALP paragraph 5.71 outlines the organisational structure for the Games and we see no reason to seek to interfere with this. Crucial as transport provision will be, we doubt that there could be a case for major permanent infrastructure investment, beyond that already planned, specifically to serve what will be a short lived demand. We accept the Mayor's response that the main additional measures are likely to be operational. Finally, and somewhat similarly, we can see no reason why retail provision in the Lower Lea Valley requires a relaxation of normal locational policies.

## **Strategic Industrial Locations**

### *Introduction*

5.145. Policy 2A.7 sets out the Mayor's broad approach towards London's Strategic Industrial Locations (SILs), with further elaboration at Policy 3B.5 and in Chapter 5. The Mayor intends that more detail is to be added in future SRIFs (in time replacing that in the existing SRDFs) and in SPG, which has been in draft since 2003. The designated locations are listed at Annex 2 and shown diagrammatically on Maps 5B.1 – 5F.1. Annex 2 distinguishes between Industrial Business Parks (IBP), for businesses requiring a high quality environment, and Preferred Industrial Locations (PIL), for businesses with less demanding requirements.

5.146. Much of this is not new. There are equivalent policies and locational maps, and a similar Annex, in the 2004 Plan. It is the material changes proposed by the FALP that we have considered.

---

<sup>39</sup> Planning Policy Guidance Note 17: Planning for open space, sport and recreation, ODPM, 2002. CDL-CG051

*SEs or SILs?*

5.147. The first is simply a change in the name attributed to these locations. ‘Strategic Employment Locations’ in the 2004 Plan; ‘Strategic Industrial Locations’ in the FALP. Dwyer Asset Management argued that this runs counter to employment trends, which are increasingly broader than those associated with traditional industrial activities.

5.148. It is a small point but we prefer the FALP designation. A wide definition of ‘industrial’ is envisaged by the FALP, including not only traditional manufacturing and (storage) warehousing, but also the whole gamut of logistics, waste management, public transport depots and utility companies’ operational sites<sup>40</sup>. It is these ‘industrial’ uses that are the subject of this policy topic. Conversely, ‘employment’ in London is increasingly in offices, retailing, hotels, leisure and professional/personal services, which are not this policy’s main focus. Also, if controversially, not every SIL location will provide significant on-site employment. In all, we think that the new designation better fits the topic it addresses.

*Wholesale food markets*

5.149. Paragraph 3.129iii foreshadows, contingent on testing, a consolidation of London’s five wholesale food markets to three locations – Western International, New Covent Garden and New Spitalfields, or at more sustainable locations. The study to test this proposition has since been undertaken, confirming the three locations as the most robust option<sup>41</sup>. This was not challenged at the EiP and we broadly endorse the changes suggested by the Mayor (BN22 & BN28) to update 3.129iii and also now to foreshadow the potential for development of a London sustainable Food Hub<sup>42</sup>. We also think that the small addition change suggested by CGMA (BN46) was reasonable and incorporate that in our recommendation.

**Recommendation 5.13**

We recommend that paragraph 3.129iii be amended as follows:

add the words “and the potential for development of a London sustainable Food Hub” at the end of the sentence starting “The Mayor’s food strategy ....” ;

delete the words “Subject to testing ...” at the beginning of the sentence that continues “Redevelopment of any ...” ; and

delete the words “not compromise” and substitute “give consideration to”

<sup>40</sup> FALP paragraphs 2.25 and 3.127 together with the reference documents supporting paragraph 3.127.

<sup>41</sup> Review of London’s Wholesale Markets, Mayor of London, 2007. CDL-LW018

<sup>42</sup> URS London Food Hub Feasibility Studies, forthcoming.

delete the words "or at more sustainable locations" at the end of the final sentence;

together with an associated update to paragraph 5.141, replace "should inform" with "has informed" in the sentence starting "A wider appraisal of London's wholesale markets ..."

5.150. This consolidation of wholesale markets, which excludes Billingsgate and Smithfield, has been taken into account below regarding the amount of (broadly defined) industrial land that might be released to other uses, although it is only a small component of the overall assessment. Confirmation regarding New Covent Garden has an important bearing on our consideration shortly of the Vauxhall/Nine Elms/Battersea OA, which includes this market.

*Individual SIL designations*

5.151. Only three of the locations listed in FALP Annex 2 have individually attracted significant controversy. One because it has been omitted from the list in the 2004 Plan and two because they have been retained. We adopted an approach here that since the Annex is subject to change, the whole of it falls within our remit including those locations where the Mayor has chosen to retain existing designations. The Mayor did not question this approach but helpfully responded with respect to all three locations.

*Vauxhall/Nine Elms/Battersea (Wandsworth)*

5.152. Nine Elms is a Preferred Industrial Location in the 2004 Plan but omitted from the FALP list of SILs. This central location is within the Vauxhall/Nine Elms/Battersea OA, which, subject to acceptance of our recommendation in Chapter 4, would unambiguously form part of an enlarged CAZ. Paragraph 5.142 sets out the Mayor's reasons for the changed designation, which carry forward matters foreshadowed in the Central SRDF (pp A9 and A15).

5.153. The change was supported by the Covent Garden Market Authority (CGMA), with some suggested minor textual modifications. The Authority told us that they understand that Wandsworth retain concerns about a perceived threat to employment, and both GOL and London Councils queried whether total deletion of the SIL has been justified.

5.154. We visited this part of London on our Panel tour. As well as the New Covent Garden Market it includes a number of low intensity activities, such as coach and other vehicle parking, in what the FALP rightly describes as a degraded environment. Such low intensity land uses have their place, but not here so close to the heart of London where the potential for more intensive and value adding development is abundantly evident. We see no reason why such a change need reduce employment opportunities, quite the reverse.



5.155. However, it is apparent from paragraph 5.141-142, and from the outcome of the Wholesale Markets Review referred to above, that the Mayor's uncontested aim is not to end all (broadly defined) industrial use here especially where this is of value to the CAZ. Some industrial type activities, particularly including the wholesale market, rationalised and intensified, are intended to remain. The CGMA suggested overcoming the FALP inconsistency by modifying paragraph 5.142. The Mayor (BN22) suggested modifying FALP Annex 2, and we think that this is the more straightforward answer albeit to a similar end.

**Recommendation 5.14**

We recommend that FALP Table A2.1 should have an additional entry: "44 Wandsworth, Nine Elms (Part)".

*Coldharbour Lane (Havering)*

5.156. At Coldharbour Lane, it is retention as an SIL that is controversial. Havering, in written submissions, argued that this conflicts with Policy 3D.10, Open space provision in DPDs, which amongst other aims states that DPDs should identify and support Regional and Metropolitan Park opportunities. Paragraph 3.251i expressly identifies the London Riverside Conservation Park as one such opportunity in an area of deficiency.

5.157. Havering described the mix of waste management related uses at Coldharbour Lane, with permissions expiring in 2018 and 2020, together with other employment uses on a former Freightmaster site. The Borough argued that the waste facilities will become redundant with the provision of a new site at Frog Island (Havering) and potential capacity at the Jenkins Lane facility (Newham), currently under construction to serve the East London Waste Authorities (ELWA). These and other facilities are to be addressed in a Joint Waste DPD being prepared by the ELWA Boroughs. Land stability and contamination were described as problematic in any future significant building at the Coldharbour Lane landfill site.

5.158. Instead, Havering are proposing to incorporate the land into the new Park, and are addressing this in their emerging LDF Core Strategy and Site Allocations, but with provision for continued employment use in the short term. The Borough saw support in the Employment Land Review undertaken by URS<sup>43</sup>, which it described as in line with the Mayor's draft SPG on Industrial Capacity. The Borough went on to argue that the residual Freightmaster site would then be remote from other employment uses, and local facilities, poorly served by road and with no direct river access. They outlined the Park's benefits and synergy with wider spatial policies for North East London, which they saw as prejudiced by retention of the industrial allocation.

---

<sup>43</sup> Employment Land Review, URS for London Borough of Havering, 2005/2006.

5.159. The Mayor very much followed the line in the East London SRDF, where “it is recommended that Coldharbour Lane be retained as SEL [SIL] at present given its current operational requirements, which include waste use and its valued potential to receive and transport material by river. The future use of this location, including its relationship with the Rainham Conservation Park should be the subject of further discussion between strategic and local stakeholders”.

5.160. In amplification, the Mayor suggested that Havering is proceeding with its DPD on an incorrect basis in assuming that sufficient provision has been identified for waste management. He saw a need for additional capacity to handle a further 100,000 tonnes per annum to meet the apportionment from the Early Alterations, and considered that it would be premature to de-designate Coldharbour Lane until this is resolved. The land is not part of the Green Grid shown in his draft SPG, and the East London SRDF Map 4D.5 shows it as a distinct location within the wider London Riverside Conservation Park. Its omission from New Table 4A6: ‘broad locations for recycling and waste treatment facilities’ does not mean that it is unsuitable for waste management.

5.161. We have found this a difficult issue to resolve. Looking at the diagrammatic map of the proposed Park in the SRDF it is not difficult to see why Havering would prefer to include the Coldharbour Lane area within it. So far as we can see, it would otherwise remain as a potentially intrusive indentation, part of a locality annotated ‘areas identified for improved access and provision of green space.’

5.162. Also, so far as we can see the Industrial Land Baseline Report<sup>44</sup> reflects the Borough’s position and does not rely on retention of this land for industrial related purposes generally or waste management in particular.

5.163. The Mayor’s case for retaining this particular PIL is based entirely on its role for waste management. Policy 4A.21iv, ‘Broad locations suitable for recycling and waste treatment facilities’ states that: ‘Boroughs in their development plan documents should identify adequate provision for the scale of waste use identified’ in the Plan. It lists three categories of location, but on careful reading it is clear that those locations that are within a PIL or IBP are intended to be identified in New Table 4A.6 and Map 4A.6. The others are Local Employment Areas and also existing Waste Management Sites, implicitly those that are not on a PIL or IBP. This policy, table and map were all adopted as part of the Early Alterations<sup>45</sup>.

5.164. At first sight the omission of Coldharbour Lane from the list supports the Borough’s position. Conversely and inconsistently, however, we see that the

---

<sup>44</sup> North East and South East London Industrial Land Baseline, URS for Mayor of London, April 2007, p 44. CDL-LW060

<sup>45</sup> They are New Waste Policy 4; Table 4A.7 and Map 4A.1 in The London Plan. Housing Provision Targets, Waste and Minerals Alterations, Mayor of London, December 2006. CDL-LW050

location does appear to be identified on the corresponding Map 4A.6, suggesting that omission from the written list might be more an error than an intention. And plainly if the Mayor is correct in his assertion that the Borough has a significant waste management capacity deficit, below its apportionment, this would need to be resolved prior to any final decision to release the land.

5.165. In view of the somewhat conflicting evidence, and the fact that the Borough was not directly represented at the EiP, we are reluctant to make a definitive recommendation. Rather we urge that the Mayor and Borough seek to resolve this issue directly before final publication of the FALP, on the basis that in principle it would be desirable to omit Coldharbour Lane as an SIL, so that in time it could be incorporated into the London Riverside Park. We lean towards the Park taking priority here, but this does need to be subject to the Borough demonstrating that there is satisfactory provision elsewhere for meeting the Borough's waste management apportionment.

*Wood Lane (Part) including Freston Road (Hammersmith & Fulham; Kensington & Chelsea)*

5.166. Wood Lane again concerns retention rather than deletion as a SIL. The issue is closely bound up with the locality's inclusion within the White City OA and major retail and residential development in train at White City/Shepherds Bush. Hammersmith & Fulham, in particular, in written submissions, argued that the SIL designation is incompatible, especially with respect to use for waste management.

5.167. The Mayor drew attention to his undertaking in paragraph 5.166, to work with the two Boroughs concerned, recognising that "this may entail revision to strategic industrial designations provided it does not compromise capacity to meet future demand for industrial type activities including waste management facilities." The Forum queried the use of such a large site just for waste treatment, suggesting that a new railway station intended nearby could make the location also appropriate for logistics, but they supported the SIL designation and suggested that the retail development would itself generate waste that could well be processed locally.

5.168. This is evidently an ongoing disagreement. It was referred to by the Panel who considered the Early Alterations, at paragraphs 8.66 to 8.88 of their Report.<sup>46</sup> We have looked at the relevant – in this case West London – SRDF. Paragraph 146 refers to broad indicative boundaries shown in an annex, one of which is Wood Lane SIL. Paragraph 147 goes on to note that Wood Lane has been linked to the retail development, but in all we see nothing that flags up an intention to delete this SIL designation. Rather, in this case the now adopted Early Review Table 4A.6 includes Wood Lane within the broad locations for recycling and

---

<sup>46</sup> Draft Early Alterations to the London Plan. Examination in Public 2006. Panel Report, 2006. CDL-LW065.

waste treatment. The work to date by URS on Industrial Land Release Benchmarks, has been completed to Borough level only in the FALP South East and North East Sub Regions. However, at a sub regional level it does confirm that industrial land supply is very much tighter in the west of London than the east<sup>47</sup>.

5.169. There seems little doubt that further more detailed consideration will be warranted, but we consider that it would be premature at the least, and possibly inappropriate, to delete the SIL designation.

*Degree of safeguarding?*

5.170. Paragraph 2.25i states that the SILs “should be promoted, managed and where appropriate, protected as London’s main reservoirs of industrial capacity,...”. Several Participants were uncomfortable about the qualification “where appropriate” fearing that it could open the way to undue loss of industrial land, and with it loss of industrial type employment.

5.171. We do not share this concern. The thrust of the FALP policies is to protect the SILs, but not inflexibly; paragraph 2.25i goes on to recognise, for example, “the scope for continuing, selective consolidation of the SILs.” The 2004 Plan said that “These locations will be kept under review to ensure that the right locations are being safeguarded in relation to need and utility.” So the qualification in the FALP is not new, just differently expressed. The industrial sector, particularly as broadly defined in the FALP, is changing and there is nothing to be gained by a policy to safeguard land regardless of future circumstances.

*Industrial Land Releases – the amount*

5.172. The preceding topic should not be confused with the release of surplus land already anticipated in paragraph 2.55. As published this foresaw scope for the net release of 39 ha per annum 2005 – 2016, mainly in parts of North East and South East London, to go to other priority uses, notably housing and social infrastructure. The paragraph concluded that “working with partners through the mechanism of SRDFs [SRIFs], the Mayor will continue to develop more detailed frameworks to manage the appropriate release of land, especially within these sub regions.”

5.173. In advance of the EiP, the Mayor indicated that he wished to modify the rate of net release to an overall average of 41 ha per annum 2006 – 2026, comprising a higher rate of 48 ha per annum to 2016, then stepping down to 33 ha per annum for the remaining decade. The higher rate in the earlier period was based on the likelihood of existing vacant sites coming forward first, while later releases depend increasingly on projections regarding the redevelopment of sites that have yet to become available.

---

<sup>47</sup> Industrial Land Release Benchmarks, Mayor of London, 2007. CDL-LW062

5.174. These rates will plainly need to be subject to periodic review (not least to roll forward the assessment of land needed for waste management from 2020 to 2026 in line with the industrial land benchmark) but there is a substantial evidence base<sup>48</sup>, and support by GOL and LDA, underpinning the figures for present purposes. They arise from the quantified net effect of a substantial reduction in traditional manufacturing and the small reduction in land for wholesale markets referred to above, only partly offset by increased demands for land for logistics, waste and utilities and public transport functions such as bus depots.

5.175. London Councils, while accepting the assessed requirement of an additional 461 ha of warehousing to serve London, questioned whether this need all be within the London boundary. Others made a similar point.

5.176. We see this as important and valid; the outer edge of London is an administrative boundary not any kind of border. The URS Logistics study (and industrial release benchmarks) made some allowance for locational substitution outside London. There is also recognition of this in paragraph 3.129i, and in the policies regarding rail freight that we look at in Chapter 7, but we welcome and support the Mayor's undertaking to include this topic in the inter-regional engagement with SEERA and EERA that we considered in Chapter 3. In Appendix B we endorse changes suggested by the Mayor (BN54) for a wider geographic perspective to both ports and logistics provision. This might in time lead to a reassessment of the amount of land safeguarded for logistics within London, and the amount that could be released for other purposes, but until the situation is resolved it must be prudent not to release land currently projected as required to serve London's needs.

5.177. A number of Participants, notably including Bexley, lamented the trend away from traditional manufacturing, and in particular were concerned by the low density of jobs, perceived as poorly paid and unskilled, on land given over to logistics activities or waste management.

5.178. We find no reason to question the Mayor's approach. The on-going reduction in London's manufacturing capacity reflects a global switch by mature economies, such as the UK, importing manufactured goods from lower cost countries, notably China. We cannot see how the Mayor could hope to stem this trend even should he wish to do so. Londoners, no less than other UK residents, enjoy the benefits of inexpensive goods, helping to keep monetary inflation at low and stable levels compared with just a few decades ago. Moreover, London is also successfully growing an economy that is less reliant on manufacturing and increasingly based on services: finance, business and personal. The Mayor's strategy runs with the grain of, and helps facilitate, this successful economic realignment.

---

<sup>48</sup> London Industrial Land Release Benchmarks, Mayor of London, 2007. CDL-LW062; North East and South East London Industrial Land Baseline, Mayor of London, 2007. CDL-LW060; Demand and Supply of Land for Logistics in London, Mayor of London, 2007. CDL-LW064; London Wholesale Markets Review, Mayor of London, June 2007. CDL-LW018

5.179. The wider concept of industrial activities underpinning the FALP is consistent with this approach. For example, the relatively few jobs directly provided on-site by most logistics businesses needs to be seen in the context of the contribution that these activities make to supporting employment elsewhere in businesses dependent on efficient distribution networks. We comment in Chapter 8 on the need increasingly to see waste management activities not as something ‘dumped’ – figuratively or literally – on a locality, but as future opportunities for regenerative multifaceted modern businesses, occupying modern premises, providing a range of worthwhile employment opportunities. Similar points can be made about public transport depots and land used by utility companies.

5.180. None of this, of course, is to decry traditional manufacturing, which while greatly reduced remains important to London’s economy, particularly in the small and medium sized enterprises (SMEs) sector. However, it would be naïve to hold back swathes of land in the hope, against all expectations, that manufacturing is set to expand again. Doing so would lead to blight and frustrate the provision of other much needed developments.

5.181. Overall, we commend the strategy to safeguard sufficient industrial land for the increasing demands for logistics, increased self sufficiency in waste management and for public transport depots, while carefully releasing an identified surplus for other priority uses, notably housing and associated social provisions.

#### *Industrial Land Releases – the process*

5.182. All this, of course, begs the question of how releases, set as an annual average across London, are to be monitored and managed. In Policy 2A.7 the Mayor undertakes to ‘continue to develop more detailed frameworks to manage the appropriate release ...’ but without saying how. In response to GOL, the Mayor confirmed that the process would be collaborative, in partnership with the Boroughs and other relevant stakeholders.

5.183. Over the 5 years to 2006, the outturn actually averaged 90 ha per annum<sup>49</sup>. There are good reasons to assume a reducing rate, as the remaining pool of industrial land gets smaller, but there are obvious issues in how future releases are to be managed, between Boroughs and year by year.

5.184. The broad picture is evident from the studies; a preponderance of the surplus land is projected to be around the North, North East and South East Sub Regions of London, especially the North East, while projected supply is much tighter in the South West and West. West London Partnership (WLP) expressed concerns that industrial capacity on that side of London could be undermined by undue release of land. There is detailed, site by site, data available for the North

---

<sup>49</sup> London Industrial Land Release Benchmarks, Mayor of London, 2007. CDL-LW062

East and South East and robust though not site specific data for the other sub regions.

5.185. The devil, inevitably, is in the choice of individual sites. Which remain viable for industrial purposes? Which could be made viable through new enterprises, perhaps linked to the LDA's skills programmes? As London Councils queried, is sufficient attention being given to emerging research based sectors – in line with Policies 3B.6 – 3B.9? As LDA stressed, it is important to avoid blight, caused by holding onto unsuitable industrial land, but equally, as raised by LTF and LCF, the planning system has a role in protecting viable sites and the jobs they provide from purely speculative changes.

5.186. Understandably there was a consensus at our EiP session, not resisted by the Mayor, on a pressing need for his long delayed (in part because of evolving National policies) SPG on Industrial Capacity to be completed, in close collaboration with the Boroughs and other stakeholders, in order to provide further guidance, on both quantity and – importantly – quality land release issues. We add our voice to the need for this, taking the opportunity to record the Mayor's intention for final publication to be in the spring of 2008, and intend that the modified wording we endorse for paragraph 2.25 should be read in this light and having regard to PPS1<sup>50</sup> paragraph 23.

#### **Recommendation 5.15**

We recommend that paragraph 2.25 read: "Though London's manufacturing sector continues to contract, there is a wide range of other industrial type activities which gain competitive advantage from a London location or perform roles which are important to the wider economy, especially logistics, waste management and recycling and transport related activities (Chapter 3B). Taking into account trends in the wide range of industrial type activities and scope for more efficient use of industrial capacity, as well as more specific new requirements for waste management and recycling (Chapter 4), there is scope for an average annual net release of 41 ha per annum 2006 – 2026, mainly in parts of North East and South East London. This should go to other priority uses, notably housing and social infrastructure. Research indicates that through rigorous management of vacancy rates, a higher level of release is appropriate in the early part of the plan period (48 ha per annum 2006-2016). Further guidance on monitoring this benchmark and the management of industrial capacity, including the distribution and phasing of release, will be provided in SPG. Working with partners through the mechanism of SRIFs, the Mayor will continue to develop more detailed frameworks to manage the appropriate release of land, especially within these sub regions."

<sup>50</sup> Planning Policy Statement 1: Delivering Sustainable Development, DCLG, 2005. CDL-CG027

*Industrial Land – mixed uses*

5.187. Policy 3B.4 makes provision for mixed uses associated with office developments, particularly in the CAZ and north of the Isle of Dogs OA, but as it stands the FALP make little or no provision for mixed uses with industrial developments, as a potential alternative either to full retention or full release of industrial land. GOL saw the scope to do more, referring to National policies supporting mixed uses, as did business sector Participants including Brixton plc, Dwyer Asset Management and Neptune Wharf, who referred to the changing nature of what constitutes ‘industrial’ activities as allowing greater scope for integration with, for example, residential. LDA made a similar point, as did HBF who saw particular benefits for the suburbs. Notes of caution were sounded by London Councils, London First, LCF and the Forum, spanning environmental impacts on residents, constraints imposed on industries and risk of enticing retail outlets away from Town Centres.

5.188. These last are, of course, all valid concerns that would need assessment in any particular case. However, we also recognise that many modern industrial activities (even, as we note in Chapter 8, some that in the past have been seen as unneighbourly) can satisfactorily coexist with, say, homes or social infrastructure such as schools, and that there can be sustainability benefits from doing so. GOL recommended inclusion of the indented section of paragraph 7.7 of the draft SPG on Industrial Capacity into the FALP as providing a robust approach, but we would be concerned at elevating that level of detail into the statutory plan without it having been available for responses when the FALP were published. It would in any event gain influence by publication of the final version of the SPG. We think that it is again sufficient for the present to endorse a change suggested by the Mayor in BN22. We see no basis for modifying the final clause, in the manner suggested by the Forum, to say “avoid harm to Town Centres” since it is difficult to see how something that contributes to renewal could be simultaneously harmful. There are also already policies elsewhere in the Plan aimed at protecting Town Centres.

**Recommendation 5.16**

We recommend that an additional criterion be added to Policy 3B.5, Strategic Industrial Locations: “the potential for surplus industrial land (as defined in assessments) to help meet strategic and local requirements for a mix of other uses such as housing and social infrastructure and where appropriate, contribute to Town Centre renewal.”



---

## Chapter 6 Aspects of Housing

### Introduction

6.1 Housing was one of the topics considered extensively by the Panel which examined the Early Alterations to the London Plan (EALP) and which reported as recently as September 2006.<sup>1</sup> In BN1 the Mayor set out the responses he had made to that Panel's recommendations, and much of Chapter 3A of the FALP therefore consists of material which has recently been examined and was not before this Panel. Other substantial parts of the Chapter remain unchanged from the 2004 Plan.

6.2 In the light of representations made on the FALP, however, we considered that there were three topics which we ought to examine. The first was on density policy – in particular the proposed changes to Policy 3A.2i and its supporting text and to Table 3A.2. The second was on affordable housing, and particularly the thresholds set out in proposed Policy 3A.8i. The third concerned compatibility with PPS3<sup>2</sup>, which had been issued subsequent to the EALP Panel Report.

6.3 That report was not without comments on some of these matters. The Panel had things to say about density and character (especially on pp 3-4 and 32), about affordable housing (pp 28-29), and about housing mix – which arose during our debates too (pp 30-31). There is nothing significant in their report with which we disagree; nor did the evidence presented to us suggest a different conclusion. It was so recent that it would be surprising if this were the case. We do not repeat their conclusions here, but we have taken them into account and refer to them from time to time.

6.4 This limited consideration of housing matters brought with it the problems we described in our Overview. There were many representations which we were unable to consider because they addressed parts of the Plan that were not subject to Alterations initiated by the FALP; or more frequently they concerned changes which were already agreed as part of the EALP and recorded in the FALP in a distinctive font. This was helpful in many ways, as it set the FALP in context, but we believe that some of the respondents to the document misunderstood these particular changes as being open to Examination.

6.5 There were times when we felt uncomfortable about the limitations we faced. Many of the points made, particularly by residents and community groups, were important. In some cases they went to the heart of the Plan and indeed spoke more widely of the effectiveness (or otherwise) of regeneration policies across London. However, we did not have a comprehensive body of evidence on these

---

<sup>1</sup> Draft Early Alterations to the London Plan. Examination in Public 2006. Panel Report. Mayor of London, 2006. CDL-LW065

<sup>2</sup> Planning Policy Statement 3: Housing, DCLG, 2006. CDL-CG028

matters, nor the time, nor the remit, nor in most cases specific proposals as to how the Plan might be altered to deal with them. We can only express the hope and expectation that the Mayor will have understood the concerns which were expressed and will take them into account in future reviews.

6.6 There was a further, familiar, difficulty which led to some debate at the EiP. The answer to some of the concerns which people raised, for example about the proposed Alterations on density, lay elsewhere in parts of the Plan not altered by the FALP. Some parties had understandable difficulties in reading across the various policies – in reading the Plan as a whole. Some sought additional cross references as a solution to this, but we are reluctant for the most part to recommend this; they could serve to confuse rather than enlighten. Others suggested that some form of popular version of, or “guide” to, the Plan might be produced. The Mayor indicated that he had considered this. There were legal problems in producing a “popular” version; but he indicated a willingness to consider a “user’s guide” to reading and understanding the Plan.

**Recommendation 6.1**

We recommend that the Mayor pursues the idea of producing guidance on the use of the Plan.

6.7 We make one other general point. Many of the representations seemed to us to relate not so much to the policies themselves as to the way in which they were being implemented, particularly by the Boroughs. We touch on this later but it may be that through SPG the implementation of the Plan can be improved.

6.8 Several BNs are relevant. We have mentioned BN1 which deals with the EALP. BN2 relates to housing provision after 2016. BN3, which we requested, explains how accommodation for gypsies and travellers is to be handled. This is an important matter, but we are unable to take it further. BN3 explains that research is ongoing but not complete. The matter will be dealt with through the Mayor’s Housing Strategy and introduced into the London Plan as part of the next Alterations; we have no choice but to accept that.

6.9 BN5 contains a number of relevant corrections, which deal with some of the points made in evidence and statements. BNs 32, 48, 49, 50, 59, 60, 61 and 63 contain various comments and contributions of relevance and BN67 contains some further proposed Alterations from the Mayor, in the light of the EiP.

6.10 We have taken into account a number of other documents including the Mayor’s Housing SPG<sup>3</sup>, the London Plan Density Matrix Review<sup>4</sup>, and the report

<sup>3</sup> Housing. The London Plan Supplementary Planning Guidance, 2005. CDL-LW027

<sup>4</sup> London Plan Density Matrix Review, URS for Mayor of London, 2006. CDL-LW011

by Three Dragons and others on Thresholds for the Application of Affordable Housing Requirements<sup>5</sup>.

## Density

6.11 FALP Policy 3A.2, Borough Housing Targets, was fixed following the EALP. This sets a context for the density discussion, referring as it does to “...development at higher densities where consistent with the principles of sustainable residential quality set out in the density matrix in Table 3A.2”. The policy also refers to the “adequate provision of local services ... and public open space to meet future needs” – a topic which, as we shall see, was raised during the EiP by a number of parties. Proposed Policy 3A.2i had been moved from Chapter 4B and altered (and further minor corrections were included in BN5). Table 3A.2 set out the matrix and paragraphs 3.15i-vii provided the supporting text.

### *The matrix*

6.12 We deal first with the matrix itself, before coming to some of the implications and effects which concerned Participants. In the published FALP the matrix was set out in an Appendix but the Mayor confirmed that, as with other FALP charts, tables and maps, this was a matter of printing convenience and it was his intention to include it – as in the 2004 Plan – in the main text. Several parties had raised this, and we welcome the Mayor’s assurance.

6.13 The matrix had been simplified somewhat, as compared with the previous version. References to “location” had been moved to the sub text, and car parking had been removed from the matrix. Predominant house types were no longer included but there was reference to habitable rooms/unit – to which we refer later. Cells which had been left blank in the previous matrix had been completed. This simplification did not prevent some parties – eg Planning Aid for London (PAFL) – expressing concern about its complexity (“...not accessible or easy for non-planners to understand or use”). This is a genuine concern but in view of the simplification we think it is less of a concern than the previous version (London Councils described it as “clearer and easier to understand”) and we do not feel able to suggest simpler ways of presenting the information. However the “guidance” to which we referred above<sup>6</sup> might assist in this respect.

6.14 As to the content there was firstly some concern about the high densities being proposed. In fact the range of densities in the FALP matrix was broadly the same as that in the previous table, and the highest figure in both, for the most accessible central areas, was 650-1100 habitable rooms per hectare (hr/ha). While opinions differ about the implications of high density, it did appear to us that the

---

<sup>5</sup> Thresholds for Application of Affordable Housing Requirements, Three Dragons et al for GLA and GOL, 2003. CDL-LW035

<sup>6</sup> Paragraph 6.6 and Recommendation 6.1

---

greatest problems which were perceived arose from the application of the matrix rather than the figures it contained.

6.15 Some parties – eg the London Civic Forum (LCF) and London Tenants Federation (LTF) – were concerned about the importance attached to transport accessibility in the matrix (with higher densities proposed close to good public transport connections); but we think that in sustainability terms such a relationship is important – and indeed widely accepted practice in planning now. We support paragraph 3.15vi therefore.

6.16 GOL’s view was that “The Government supports the Mayor’s approach to density in Policy 3A.2i and Table 3A.2” (statement pp 1-2), and that the Plan was “consistent with PPS3”. At the EiP, GOL said that it thought the Policy was clearly evidence based and though the ranges were wide they appeared to reflect the requirements of National policy. The Forum strongly supported the matrix – “...one of the most innovative and sophisticated tools in the armoury of the London Plan” (though concerned as we shall see about implementation). Others who generally welcomed or supported it included London Councils, London First, and ALBPO. The LTF, supported by LCF, advocated a maximum of 350 hr/ha but the Forum and others disagreed with this proposal. It seems to us that even if we felt able to recommend changing an approach which was effectively settled in the EALP, this would not be in line with Government thinking on density as it now stands.

6.17 As a result of the evidence and debate we see no reason to recommend any change to the matrix. But that is not the end of the story.

#### *Flexibility and implementation*

6.18 As we have said, the key questions surround the way in which the matrix is applied, and there were very different views about this. It is clear that the matrix is intended to be flexible and not prescriptive. But this flexibility was perceived in different ways by the house-building industry and by community groups.

6.19 Bellway for example said that “...it should not be seen as a means of preventing densities higher than those indicated...” and that “...it should be made clear ...that the upper end...is not to be seen as a maximum”. Neptune Wharf said that the matrix “...should not be treated as static but be used as one of many tools for increasing density solutions”.

6.20 But the Forum had a different concern. They pointed out the figures in the Density Matrix Review which showed that 67% of schemes in 2004/5 had densities above the upper end of the “appropriate density range”; 23% were within the range and 10% below it. The Forum’s view was that it should be only in exceptional circumstances that developments should go above the limit. A number of parties, including LTF and LCF were also concerned about this, and the Haringey Federation of Residents Associations (HFRA) made some strong points

in their written evidence on the same lines. PAFL said that "...the density matrix appears to be used as a secular tool by developers and local authorities....in order to maximise rather than optimise densities on sites...". GOL wondered why so many developments exceeded the top end of the range.

6.21 We are concerned that so high a proportion of developments appear to be above the upper end of the range and asked questions about this at the EiP. ALBPO suggested that the cause was the lack of up to date LDFs, and the Mayor referred to a "settling down period".

6.22 However the Mayor did accept that there was a problem here and he offered at the EiP to give further guidance. We welcome this and we think that firm guidance should be incorporated into the Housing SPG. We return to it when we make a recommendation later – but there are some other related issues.

*"Maximise" or "optimise"*

6.23 FALP Policy 3A.2i is entitled "Maximising the potential of sites". This is unchanged from the previous Policy 4B.3. In the third line it refers to achieving the "...maximum intensity of use..." subject to various caveats about local context, design principles and local transport capacity. This part of the policy was also unchanged from the previous version. However to many of the participants at the EiP it was this quest for the maximum which lay at the heart of the problem. LTF objected to "...an ever increasing desire for higher densities". The Forum, in BN48, suggested various changes, eg to alter the title to "making best use of housing sites" or "optimising the potential...". They suggested changes to the policy itself along similar lines. They pointed out that the Housing SPG does not refer to maximisation – a point well made; it says that "higher densities may be possible where this can be justified by local circumstances" (paragraph 6.7) and talks of the "best use of" sites (paragraph 6.2). (However it does date from 2005, before the EALP or PPS3).

6.24 This view of course runs directly counter to the argument of parties such as Bellway and London First who argued at the EiP that the policy *should* be used to maximise development in order to deliver the housing numbers in the Plan and the housing numbers required by the Government. Some of these views could be read as a relentless quest for yet higher densities (see eg the opening paragraphs of Bellway's statement). But on the other hand Bellway also argued, as did the Mayor and others, that there are many other checks and balances in the system – some of them in the caveats in Policy 3A.2i itself and others elsewhere in the Plan – on design, sustainability etc - which moderated the effect of the maximisation objective.

6.25 We have reflected on this issue. As we have said, while supporting the matrix, we are concerned at the high proportion of developments above its range which are occurring in practice. Some cases might imply exceptionally favourable site conditions, but it cannot be desirable for two thirds of developments to be

above. As we have said we think that this is primarily a matter of interpretation and implementation rather than what appears in the policies themselves, which in this respect are largely unchanged. We also take into account the views of the previous Panel who, in paragraph 2.7, referred to the need for higher densities to “bridge the gap” between need and capacity. In 1.12 they referred to “...higher density development in almost every area to achieve the necessary housing capacity”. This must be right. They did in fact use the word “maximising” in 2.7 in relation to the potential of larger and the more difficult smaller sites – subject to environmental and infrastructure considerations. We also note paragraph 21 of PPS1<sup>7</sup>, which says that outputs should be “...maximised whilst resources used are minimised” eg by building houses at higher densities on previously developed land rather than at lower densities on greenfield sites. PPS3 on the other hand does not use the “m” word, referring to “efficient use of land” – but it is a policy statement designed to cover the whole of England and it is important here for us to reflect the particular circumstances of London.

6.26 The word “maximise” is unchanged from the 2004 Plan. It has been considered by previous Panels. We do not recommend a change at this stage therefore. But we do think the additions we propose (see above<sup>8</sup>) to the Housing SPG will help to make clear how this policy should operate and help to avoid the excesses to which this policy might lead if untrammelled. The Mayor should also stress in the SPG that the policy does not stand alone, but stands in the context of other policies which bring into play other criteria. We discuss this again in the next section and propose some modification to the supporting text to strengthen this even further.

### *Social infrastructure*

6.27 The concern about high densities which many of the parties expressed arose at least in part from a concern about the provision of related social facilities, including shops, community and leisure facilities, public and private open space, public transport, and so on. In our view they are right to be concerned about this. It should be a fundamental of good planning – or even of not-so-good planning – that people have access to such facilities and that they should be provided alongside the development of housing. But of course we recognise that – as the SPG indicates at paragraphs 5.8-10 – needs will vary according to the type of development envisaged and the section of the market for which provision is being made.

6.28 Among those who were most concerned about this issue were LTF – who suggested on page 8 of their statement a form of words to be inserted in paragraph 3.15vi of the FALP. This would commit the Mayor to drawing up a more sophisticated matrix taking various social infrastructure factors into account (and also household income, which we think is vitally important but beyond the scope

---

<sup>7</sup> Planning Policy Statement 1: Delivering Sustainable Development, DCLG, 2005.CDL-CG027

<sup>8</sup> Paragraph 6.22

of this policy to deal with). This was supported by the LCF. PAFL also suggested on page 2 of their statement an insertion to the supporting text, at paragraph 3.15i, which would refer to social infrastructure and some other factors. Others made similar points, including the Housing Corporation (statement p 1).

6.29 The Mayor's response was essentially that this issue is covered by other policies and the other checks and balances in the planning system referred to elsewhere. We have already mentioned the reference to local services and open space in 3A.2. Other relevant policies include 3A.5, 3A.15 and various policies in Chapter 3D dealing with retail provision, open space, play areas etc. BN33, which was submitted later in the EiP by the Mayor in response to a paper from the HFRA, provides more detail about open space strategy.

6.30 While we are in general unenthusiastic about cross references we do think this is an issue which is sufficiently important to justify some strengthening of the supporting text, referring to the need to consider other policies in the Plan. We do not support LTF's more sophisticated matrix – we think it is complicated enough already, but we think more could be said about the issue. We have some other points to make about the text and we make a complete recommendation later. We also note that the current Housing SPG says relatively little about this issue. Policy 3A.15 is not seen as one of the “key policies” set out in Chapter 2. We think the revised version should say more about this. However, we also make the point often these are matters for local consideration, and that it is at the LDF level that many of the important policies and initiatives in respect of social infrastructure need to be considered.

#### *Housing “mix”*

6.31 There was a great deal of debate at the EiP about housing mix. There were strong feelings in some quarters that the “wrong” type of housing was being provided – in particular that there would not, partly as a result of the density policies, be sufficient family housing.

6.32 There is a separate policy on housing mix, unchanged from the EALP (Policy 3A.4). We did not have before us a comprehensive body of evidence on the issue, but we think we should report on the concern which was expressed.

6.33 LCF (statement paragraph 3), LTF (statement p 9), PAFL (especially in relation to housing for an ageing population and for BME groups – statement p 1), and TCPA (in relation to the elderly/disabled, evidence p 8) were among those who raised the issue. The Consortium of Registered Social Landlords (CRSL) wanted a reference to family housing added to Policy 3A.2i.

6.34 The Homebuilders' Federation (HBF) (who made some trenchant comments in their statement) and others were concerned that density policy should not control the size and type of housing offered on the market. Neptune Wharf and Bellway felt this was outside the scope of the density debate. Some

---

parties made the point that there was not a shortage of family housing – but there was a shortage of *affordable* family housing.

6.35 The EALP Panel discussed this issue (especially in paragraphs 2.14-17 and 3.14-18), as part of their wide ranging debate on housing. We think all the points they made are still pertinent.

6.36 The Mayor pointed out, and we accept, that there are other policies in the Plan dealing with the needs of older people and with London’s diverse population. We do not feel that further changes are needed at London Plan level to tackle these issues but (admittedly somewhat anecdotal) evidence suggested that at the implementation level they may not always be adequately considered.

6.37 On family housing, the Mayor argued that the clarifications to the matrix proposed in the FALP would assist. In particular the “...focus on density as assessed in habitable rooms. This is to ensure appropriate housing outputs in terms of bedroom size mix...and recognition that there will be a range of different types of housing in terms of bedroom size mix in different locations (ensuring suitable flexibility)”. In addition it would “...make clear that the form of housing output should be determined primarily by an assessment of housing requirements and not by any prior assumption as to the built form of a development. This reflects the concern that a focus on maximising unit output was leading to fewer family sized homes...”. (Statement p 1).

6.38 The Panel found this second statement particularly interesting. It does not seem to appear explicitly in the FALP as they stand, though a somewhat similar statement appears at paragraph 6.14 of the Housing SPG. We think it might be included in the supporting text and we recommend accordingly below. Clearly the Mayor intends that the assessment of housing requirements should come before the consideration of built form, since he has said it twice, and we think that to include it for the avoidance of doubt in the FALP themselves would reassure many of the parties that it will be carried through into decisions on LDFs and planning applications.

#### *Safeguarding character*

6.39 Again the EALP Panel considered the question of the character of development at some length, in paragraphs 1.12-14 and 3.22-26 in particular. We have also taken into account relevant sections of PPS3, notably paragraphs 48-50. It was during the debate on this topic that some of the matters we feel unable to comment upon were raised – the effects of gentrification, the creation of communities which were isolated or where there was not a mix of population. These raise fundamental issues which go beyond the scope of the FALP and indeed the London Plan itself, but which should not be overlooked.

6.40 London First wanted references to “local character” removed from paragraph 3.15i on the basis that it is a “loose term” which may be “...used to



frustrate development”. This was not a widely held view and it is not one we can support. It does of course need to be read in the context of PPS3, which says for example that the density of existing development should not be used to dictate that of new housing. But to suggest that local character is not an issue which should be mentioned at all seems to us to be quite wrong and paragraphs 46 and 48 of PPS3 seem to us to confirm that.

6.41 The Forum at the EiP and in BN49 made a strong case for the FALP to refer to the CABE/English Heritage (EH) guidance on tall buildings.<sup>9</sup> The BN sets out their case in detail and there is no point in repeating it here. The Forum’s concerns are essentially in relation to policies in Chapter 4B (notably 4B.1 and 4B.7) and they are to do with the concern which the Forum and others have about tall buildings in London. EH supported the inclusion of this reference (BN50) as did others in BNs 59 and 60. We considered the question of tall buildings in the context of the CAZ in the previous Chapter at paragraphs 5.69 to 5.72.

6.42 The Mayor thought that because the CABE/EH guidance was being reviewed it would not be appropriate to mention it. EH however in BN50 indicated that the “...current revisions are relatively minor...” and in fact since the EiP ended the guidance has been published (on July 26). That therefore is not now, if it ever was, a reason for omitting the reference. We note that the Plan does refer to other CABE guidance, and we see no reason why this should not be included too, most logically in Chapter 4B – we so recommend below.

#### *Commercial development*

6.43 The Mayor proposed in BN5 to omit the words “and commercial” from Policy 3A.2i (as a result of having moved the policy into the Housing Chapter from Chapter 4B). He felt that the matter was dealt with in Policy 4B.1 and paragraphs 4.37 and 4.44.

6.44 The Forum made some points about this in their statement, and in particular suggested that a “...density matrix for commercial uses...” should be developed by the Mayor (top of p 3). We think this falls outside our brief but we hope that the Mayor will consider the proposition.

6.45 The Forum also pointed out that certain consequential changes of detail may be needed, for example to paragraph 4.44, as a result of the change but we are content to leave it to the Mayor to ensure that such changes are made.

#### *Other Details*

6.46 A number of points arose in relation to Policy 3A.2i and the supporting text, especially paragraphs 3.15i-vii. We have already indicated two additions which we intend to recommend.

---

<sup>9</sup> Guidance on Tall Buildings. Consultation 2007, CABE/EH, 2007. CDL-CG014

6.47 The Mayor proposed to delete the addition he had proposed to the policy referring to the SPG. We agree.

6.48 The Forum in BN48 suggested various Alterations. We do not accept, essentially for reasons given earlier, the proposal to change “maximum” to “sufficient” in paragraph 3.15i, or “maximise” to “make more efficient use of (etc)” in paragraph 3.6 and Policy 4B.1. The Forum proposed altering “reflect the density matrix...” to “in accord with the density matrix...” (in paragraph 3.15i). We do not accept this; the matrix is clearly intended to be a guide, with a degree of flexibility, and not set in stone. In Chapter 5 paragraph 5.129 we looked at the related question of “maximising” or “optimising” development in policies relating to OAs and AfIs.

6.49 The Forum proposed, and the Mayor agreed (in BN67) various changes to paragraph 3.15v, which provides a welcome clarification of the character definitions. Essentially these changes were to replace “10 minutes walking distance” with “800 metres walking distance”. We agree with these changes, and also others to this paragraph proposed in BN5.

6.50 We have taken account of other detailed suggestions made by various parties.

### **Recommendation 6. 2**

We recommend that the changes proposed by the Mayor to Policy 3A.2i and paragraph 3.15v in BN67 are incorporated into the FALP. In Policy 3A.2i – delete “(see section 6 of the Mayor’s Housing SPG)”. In paragraph 3.15v (“Central”) delete “...10 minutes walking distance of an international or major town centre”; add “...800 metres walking distance of a metropolitan or major town centre”; (“Urban”) delete “...10 minutes walking distance”; add “800 metres walking distance”.

We recommend the following addition to paragraph 3.15i, drawing on propositions from LTF and PAFL: before the final sentence add “All development should take into account policies elsewhere in this Plan including those requiring the adequate provision of social infrastructure including local shops, the provision of public and private open space, and community, leisure and play facilities as appropriate”.

We recommend that a further addition is made at the end of paragraph 3.15iii: “The form of housing output should be determined primarily by an assessment of housing requirements and not by any assumption as to the built form of the development”.

We recommend that when the Mayor’s Housing SPG is updated it should (a) give clear guidance on the circumstances in which the figures in the

matrix might be exceeded, with a view to reducing the exceptionally high proportion of cases in which this occurs; and (b) give further advice as to the kinds of social infrastructure which need to be provided in particular circumstances, building in particular on Policy 3A.15 (as amended in BN5).

We recommend that the words “Local Authorities should take into account the CABE/English Heritage guidance on Tall Buildings” should be added to the sub-text following Policy 4B.8.

### **Affordable Housing**

6.51 There are several policies on affordable housing in the FALP. Though the detailed changes to Policy 3A.7 raised some issues, which we come to later, it was the introduction of a new Policy 3A.8i which attracted the greatest level of comment. This policy proposed the introduction of a threshold – affordable housing should normally be required on a site with a capacity of more than 10 homes (applying the density guidance in Policy 3A.2i). The Plan had not previously contained such a policy, but paragraph 18.2 of the Mayor’s Housing SPG contained a threshold of 15 units.

6.52 This was also an issue considered by the Panel as part of the EALP – see paragraphs 3.6-3.13 of their report. We have also taken into account the report of Three Dragons and others entitled “Thresholds for the Application of Affordable Housing Requirements” and information in BNs 5 (Minor corrections), 61 and 67.

6.53 We make another point here. New Policy 3A.8i as written is not absolute. It contains the word “normally” – something which is not normal these days in planning policy-making; this occasioned some discussion at the EiP and the view was expressed that it was justified in this case to make clear that the policy was not rigid. It also sits alongside Policy 3A.7 (unchanged) which refers to the need to apply policy flexibly, taking into account site costs, the availability of subsidy, and other factors. Paragraph 3.41 talks about viability and the individual circumstances of the site. It is important to read the policy in the context of these statements and other supporting paragraphs.

6.54 The context for the debate is that there is a clear shortage of affordable housing in London. The TCPA pointed out to us that since 1979 London has lost more than 260,000 affordable homes through the Right to Buy scheme. Last year 6,037 new affordable houses were provided and 11,549 sold through Right to Buy (TCPA evidence, paragraph 5.8). The LCF gave us powerful evidence of the level of housing enquiries at Citizens Advice Bureaux. Furthermore, Policy 3A.7 of the London Plan – that 50% of provision should be affordable – is not being met (we were told that the current figure is 32%). We received evidence about the difficulties which Londoners have in affording to buy housing and we have no doubt that this is a very serious problem.

6.55 There are two main issues for us in relation to this new policy. The first is whether it is appropriate for the Plan to contain such a threshold at all. The second, assuming that it is, is whether the figure of 10 is justified.

*Compliance with National Policy*

6.56 On the first point we heard conflicting views. Paragraph 1.5 of PPS11<sup>10</sup> and paragraph 28 of PPS3 were widely quoted by those who felt the policy was inappropriate in principle. They felt that the policy should be set at a local level. Among those who believed this were the HBF (see paragraphs 11-12 of their statement), and Bellway (paragraphs 17-19). We do not repeat their points here but we have taken them into account.

6.57 The Mayor argued that such a proposal was in line with National policy and gave various justifications for it. At present there was a “confusing and inequitable” distribution of affordable housing in London. We were told that 9 Boroughs already had a threshold of 10, and 19 had thresholds of 15 though at least 2 of these were currently reducing it to 10. (In some cases these result from directions from the Secretary of State – we note the variety of these directions - see GOL statement for details).

6.58 Several other parties supported the Mayor. The Housing Corporation said the FALP “...would appear to be consistent with National policy...”. London Councils, LCF, the Forum, LTF, CRSL, and PAFL also generally supported the Mayor. CRSL said that the “...position is so grave that it has to be done”.

6.59 GOL did not indicate whether it believed the policy to be in line with National guidance or not. It said (paragraph 13) that as PPS3 “does not require” thresholds to be set out in RSSs, they “...would ask the Panel to consider whether a London-wide threshold as proposed in Policy 3A.8i is justified, including whether sufficient evidence is available to support such an approach”.

6.60 We have considered the relevant PPS policies. For PPS11, the question is whether this is “...a matter of genuine regional and, where appropriate, sub regional importance”. We think that in the case of London it is. In a region such as (to take examples at the extremities) the South West or the North East it may not be appropriate. There will be major differences of approach between, say, Bristol, Cheltenham and North Cornwall; or between Berwick-upon-Tweed, Newcastle and Durham. London is not like that. It is a single conurbation which, while far from homogeneous, nonetheless shares broadly similar problems such as housing affordability right across the region. Inconsistencies between closely intertwined Boroughs may have a greater impact than differences between Districts in other regions without the same overall concentration and inter-connection of development. London is also an area – unlike other regions – where there are relatively few large sites and a large number of small sites; this means that the

---

<sup>10</sup> Planning Policy Statement 11: Regional Spatial Strategies, ODPM, 2004. CDL-CG039

---

relevance of a threshold is greater. So we think that in the London context this is a genuine regional or sub regional issue.

6.61 Similar points apply to paragraph 28 of PPS3. This is not the clearest paragraph in the PPS repertoire, but it does not seem to us to preclude the inclusion of a threshold in principle, if there are reasons for having one, as part of the “regional approach”. We have given some London related reasons above. We would add that representatives of the development industry felt that this was a matter which should be argued out at each Borough LDD Inquiry. We do not think this is an efficient way of arriving at a co-ordinated policy across London – indeed it is one which would mean that there was in some areas no policy at all for some time, apart from the SPG. We think it could lead to delay and inconsistency. We think that a multitude of different targets across London puts the development of affordable housing at risk.

6.62 But we do accept that there may be special circumstances in some Boroughs which might mean that the London wide threshold was inappropriate; if arguments could be put for a higher or lower figure we would accept that as a result of the LDD process different outcomes might ensue. (The policy itself encourages Boroughs to go for lower thresholds where possible through DPDs. The Mayor comments on this issue in the last part of BN67). But we prefer to establish a policy, from which departures might be possible, rather than to establish no policy and to allow one to evolve.

6.63 We therefore think it is appropriate for the FALP to contain a Policy such as 3A.8i.

*Is ten the right level?*

6.64 We move on therefore to consider whether the reduced figure of 10 is reasonable and justified. Once again there was a division of views, broadly along the same lines, with house builders resisting the tighter threshold and others generally supporting it. Bellway, HBF and London First made strong arguments in their evidence and statements against the proposal and asked for evidence that such a lower threshold was needed.

6.65 The Mayor told us that currently only 4% of homes in schemes of fewer than 10 homes were affordable; for schemes of 10-14 the proportion was 8% and for schemes over 15 homes the figure was 38%. If the 38% figure was applied on the basis of a threshold of 10, this would increase the annual affordable total by 1,225 – a 16% increase on current output. (Statement paragraph 13). These figures were not challenged. Since, as we have said, there are many small sites in London the impact is significant.

6.66 There were those who asked how the figure of 10 had been selected. The Mayor said that whilst a norm of less than 10 could have been selected the Three Dragons study suggested it would not be viable. There is sometimes a degree of

arbitrariness when close to the margins of numerical thresholds – this would be so whether the figure is 15, 10, or indeed any other number of dwellings and whether set Nationally, in the London Plan, or by individual Boroughs. In this instance the very great need for affordable units points to a threshold that is as low as can be achieved without choking off the overall rate of housing delivery.

6.67 There were also those who talked of “threshold abuse” – the practice of planning applications appearing in surprising numbers for developments just below the threshold. This however is a matter for implementation though of course policies elsewhere in the Plan, and in PPS3 relating to the efficient use of land, can be brought to bear in such circumstances.

#### *Viability*

6.68 One of the key issues raised by opponents of the figure – and indeed of the principle - was that it would make development unviable and reduce the number of houses being built – and therefore the ability to meet the housing targets. London First in particular expanded on this in their statement (pp 7-8). They and others asked for evidence that this problem would not occur (though providing little beyond assertion which proved that it would).

6.69 The Mayor produced some figures which showed that in those Boroughs which had already adopted a threshold of 10 there appeared to have been no such damaging effect (statement paragraph 16). All but one of the eight Boroughs which had been operating it for some time had exceeded their housing targets, with an average of 126% of target across the eight (compared with 119% in London as a whole). And as we have noted the policy is not in any event a rigid one and it sits alongside others which do require viability in individual cases to be taken into account.

#### *The Panel's view*

6.70 In reaching our conclusion, we take into account the provisions of paragraph 29 of PPS3, and particularly the penultimate bullet point which refers to a national “indicative” threshold of 15, which can be departed from if evidence exists to do so; and also the conclusions of the Three Dragons report, and the comments of the previous two Panels. On the evidence we believe that the figure of 10 is justified.

#### *Low cost market housing/tenure/income levels*

6.71 The unaltered Policy 3A.6 contained a definition of affordable housing. GOL pointed out that the inclusion of low cost market housing in this definition conflicted with PPS3 (which as we have seen was issued after the FALP were published), and specifically with paragraph 26 and Annex B (statement paragraph 9). There should be a consequential change to paragraph 3.26. The Mayor did not agree. He felt that in the circumstances of London there may be cases where low

cost market housing could contribute to affordability and that it was necessary to persuade the private sector to provide more. Affordability should be defined by cost – who provides the housing is not relevant. While we take this point, we nonetheless accept that the FALP should be brought into line with PPS3 policy, as we do not believe the London-specific issues are sufficient to over-ride National policy considerations in this case.

6.72 There was much other evidence – from bodies such as LCF and LTF – about issues of tenure, and the breakdown between social rented, intermediate and market housing. They made some important points but we think they are for the Mayor to consider as part of the Housing Strategy or the SPG rather than the London Plan itself.

6.73 The Mayor proposed a factual updating of the figure in paragraph 3.26 regarding the income levels at which households might become eligible for sub-market housing. The figure which he gave represented the upper end of a range (set out in paragraph 15.9 of the SPG). Several parties felt that the figure in the FALP was unrealistically high and was not comparable to the income levels of key workers in the real world. It was suggested (and the Mayor agreed in BN67) that a reference to the full range rather than the upper limit would help to clarify the position; we support this proposal.

### **Recommendation 6.3**

We recommend that the references to low cost market housing in Policy 3A.6 and paragraph 3.26 should be omitted.

We recommend that the altered income level figures in paragraph 3.26 should read "...households on incomes of between £16,900 pa and £52,500 pa with a monitoring midpoint of £35,600 pa (as at February 2007, to be reviewed annually to reflect changes in lower quartile house prices)...", as set out in BN67.

### *Compliance*

6.74 A number of parties argued in evidence that the affordable housing targets were failing in two respects. The first was that the 50% figure in Policy 3A.7 was too easily negotiated away. The second was that it proved too easy for off-site provision to be negotiated and that tighter control of this practice was needed.

6.75 We received little direct evidence on the first point but it was suggested that the fact that the 50% target is being missed across London as a whole by so wide a margin implies that there is not a rigorous application of the policy. Bellway said that in practice it was not easily negotiated away and that a great deal of evidence needed to be provided to argue for an exception. London Councils argued that performance was improving. We think that, though

performance needs to improve, this is a matter of implementation and does not require a change to the Plan itself – which sets out the policy clearly. This was the Mayor’s view too, though he felt that there were cases where the figure had been too easily reduced and that “determination must be absolute”.

6.76 On the second point the LTF supplied evidence of cases relating to off-site provision and the difficulties attached to S106 agreements. They set this out in BN61, together with a recommended addition to the FALP (p 2). It has to be said that the cases they quote are not recent – they date from 1995, 1998 and 2000. London Councils and others argued that there had been a “step change” and that such cases were no longer likely to happen. We think this is again largely a matter of implementation. But we note that the addition requested by LTF (to the effect that sites should be identified before agreements are reached for off-site provision) already appears in the FALP (see paragraphs 3.44i and ii). The Mayor agreed that there should be an agreed site before S106 payments were negotiated for off-site provision, and there is further advice in Paragraph 18.17 of the Housing SPG. We therefore recommend no change.

6.77 The Mayor also pointed out the priority given to affordable housing in Policy 6A.4, which deals with Planning Obligations, and this is noted. But we also take and agree with the point made by the Mayor that S106 will never alone settle the problem of affordable housing in London, and measures going beyond the London Plan are clearly necessary – they will no doubt be examined as part of the Mayor’s Housing Strategy.

#### *Non-residential*

6.78 An amendment to Policy 3A.7 (third bullet point) referred to affordable housing being provided through planning agreements or conditions “...on private residential *and non residential* development”. GOL (paragraph 10 of statement) said that this was inconsistent with Circular 05/2005<sup>11</sup>, which refers to “...residential or mixed use development where there is a residential component”. The reference to non-residential development should be removed.

6.79 The Mayor’s view was that in the particular circumstances of central London this was the only way housing could be provided, and that a development of, for example, offices which provided off-site residential development could arguably be regarded as “mixed use”. We find that latter argument remarkably unconvincing. We do have sympathy with the first argument, and we do not accept the views of London First (statement paragraphs 35 et seq) that the CAZ is not a suitable location for affordable housing. However we do not think this justifies a policy which is so clearly out of step with Circular 05/2005 and the Mayor indicated at the EiP that he would reluctantly accept a different approach.

---

<sup>11</sup> Circular 05/05, Planning Obligations, ODPM, 2005. CDL-CG009



#### **Recommendation 6.4**

We recommend that the third bullet point of Policy 3A.7 should be altered to read: "...planning agreements or conditions on private residential or mixed use (including residential) development".

### **Compliance with PPS3**

6.80 As we have indicated, PPS3 came out after the FALP were published but before the EiP and we asked Participants whether there were any issues of compliance on which we should make recommendations. We have discussed some of these earlier in this Chapter. It would have been unreasonable to expect full compliance with a document which had not yet been published (though some Participants appeared to do so) and there are some areas of PPS3 where compliance at this stage would clearly be impossible. There is one important and outstanding issue, however, which we discussed at the EiP and on which we should report. The housing figures in the Plan, published following the EALP last year, go forward only to 2016/17. PPS3 requires a 15 year supply to be identified and Boroughs were concerned that the information needed for them to prepare LDDs was not available in the FALP.

6.81 We were concerned about this and in advance of the EiP we asked for a paper from the Mayor on the way forward. He produced BN2 in April setting out the process he intended to follow to roll forward the figures, indicating that a further review would "...commence in 2008/9 in order for revisions to be tested through the EiP process and published by 2011". In a further paper (BN32) the Mayor set out the way in which he felt that Boroughs could proceed in the interim; he set out a way of arriving at indicative figures (not targets) to 2020. He referred to this also in BN67.

6.82 We can deal with this matter fairly briefly. We are, as GOL said at the EiP, where we are. It is neither possible nor desirable to review everything and the new provisions do not have to be implemented immediately. It is clearly impossible to introduce new figures through the current process. This can only be done in the way the Mayor describes. We have considered whether it could be done more quickly, and we asked that question at the EiP. The need for a full evidence base and the need for full consultation make this difficult. We regard the date of 2011 as the latest date by which this work should be completed and urge the Mayor to bring it forward if possible.

6.83 During the EiP parties raised a number of issues which would need to be dealt with through this revision process (or through the preparation of the Mayor's Housing Strategy, with which it will overlap). These included the PPS3 requirements in respect of a housing delivery trajectory and strategic housing market assessment. There is a need to review both housing requirements (including the needs of different groups within the community and the need for

family housing which several parties raised again) and also housing capacity. The LTF, LCF and others were concerned that BN32 implied only a capacity led approach but the Mayor was very clear that this was not the intention and we feel that this could be clarified.

6.84 However BN32 was welcomed by most parties as a way forward and pragmatically neither we nor any of the Participants could see any alternative. It was put to us, and we agree, that the end date given in BN32 of 2020 was not satisfactory and that Boroughs would be likely to need to roll forward to later dates; the Mayor indicated that he was happy to do this and we think that 2026 should be included. It was also suggested, and we agree, that some strengthening of (the unaltered) Policy 3A.i (which already refers to the need for a review by 2011) would be appropriate. (We discussed in our Overview whether a full review of the Plan, as some parties wished, was needed).

#### **Recommendation 6.5**

We recommend that Policy 3A.1, first paragraph, is amended to read "...This figure will be reviewed by 2011 at the latest, and will take fully into account the requirements of Planning Policy Statement 3. The review will examine housing needs and requirements alongside housing capacity. The figure will be reviewed periodically thereafter".

We further recommend that after the first paragraph of Policy 3A.1 (as amended) the following is added: "The Mayor will issue guidance, which the Boroughs should follow, as to how indicative figures for housing provision in the period from 2016 to 2026 should be derived, for the purpose of LDDs, during the interim period until figures in the Plan are reviewed".

We recommend that the Mayor should issue the guidance contained in BN32, amended to refer to 2026, as soon as possible.

## Chapter 7 Aspects of Transport

### Preamble

7.1 Chapter 3C of the FALP, Connecting London: improving travel in London, addresses a wide range of transport related policies and projects. In the main, however, these are either rolled forward from the 2004 Plan or amount to updates including those to incorporate aspects of TfL's Transport 2025: Transport vision for a growing world city<sup>1</sup>. These fall outside the scope of our Examination, which focuses on draft new transport policies introduced by the FALP.

7.2 As happened with several other matters we examined, a number of Participants sought to widen the debate, for example Freight on Rail urged additional measures to support rail freight, Helioslough Ltd in their written statement promoted a particular site (outside London) for a Strategic Rail Freight Interchange and the Forum raised the concept of a "London lorry". These types of issue all fall outside our remit: they were either too detailed for a strategic plan (especially in seeking to focus on a named site outside London) or they were topics that might properly be considered in a future review of the Plan.

### Aviation

#### Introduction

##### *Scope of the Panel's Examination*

7.3 We received strenuously argued evidence, written and oral, for and against UK Government aviation policy, in essence respectively stressing the economic and business case for Heathrow on the one hand and the environmental consequences on the other. As we advised from the outset, at the Preliminary Meeting, in our Supplementary Questions and at the session itself, we are quite simply not the body to address these issues. The fact that we are unable to do so does not, of course, in any way imply that they are less than vitally important. Our silence should not be seen as implying a view one way or the other: we lack the full information, the expertise and above all any authority to pass judgement on UK aviation policy, which is ultimately a matter for Ministers answerable to Parliament. Our approach from the outset has been limited to the question of consistency between the FALP and Government policy.

##### *Regulatory framework*

7.4 The Greater London Authority Act 1999<sup>2</sup>, Section 41 sets out the general duties of the Mayor in relation to his strategies including:

---

<sup>1</sup> Transport 2025: transport vision for a growing world city, Transport for London, 2006. CDL-LW008

<sup>2</sup>The Greater London Authority Act 1999, HMG,1999. CDL-CG038

- (1)(c) the spatial development strategy ...*
- (f) the London air quality strategy ... ;*
- and (g) the London noise strategy ... .*

7.5 Section 41(4) states: *In preparing or revising any strategy mentioned in subsection (1) above, the Mayor shall have regard to -*

- (a) the principal purposes of the Authority;*
- (b) the effect which the proposed strategy or revision would have on-*
  - (i) the health of persons in Greater London; and*
  - (ii) the achievement of sustainable development in the United Kingdom; and*
- (c.) the matters specified in subsection (5) below.*

*(5) Those matters [include]-*

- (a) the need to ensure that the strategy is consistent with national policies and with such international obligations as the Secretary of State may notify the Mayor for the purposes of this paragraph;*
- (b) the need to ensure that the strategy is consistent with each other strategy mentioned in subsection (1) above;*

7.6 With respect to (1)(a) above the principal purposes of the Authority as set out in Section 30(2) of the Act are:

*Promoting the economic development and wealth creation in Greater London;*

*Promoting social development in Greater London, and;*

*Promoting the improvement of the environment in Greater London.*

7.7 Notwithstanding Section 41(5)(a) of the Act, GOL Circular 1/2000, Strategic Planning in London<sup>3</sup>, paragraph 2.9 states that “Where the Mayor intends to propose a policy or proposal in the [London Plan] which is not consistent with national policies, he or she must ensure that there are adequate reasons for doing so.”

7.8 Section 424 of the Act, amongst other interpretations, defines national policies. The White Paper: The Future of Air Transport<sup>4</sup> 2003 with The Future of Air Transport Progress Report<sup>5</sup> 2006 set out current UK aviation policy, and clearly falls within this definition. Indeed, although not directly applicable to London, PPS11<sup>6</sup> paragraph 24 expressly requires that an RSS review is consistent with the White Paper.

---

<sup>3</sup> Strategic Planning in London. GOL Circular 1/2000, GOL, 2000. CDL-CG013

<sup>4</sup> The Future of Air Transport- Aviation White Paper, DfT, 2003. CDL-CG037

<sup>5</sup> Air Transport White Paper Progress Report, DfT, 2006. CDL-CG003

<sup>6</sup> Planning Policy Statement 11: Regional Spatial Strategies, ODPM, CDL-CG039

## **Government Aviation Policy**

7.9 The White Paper objectives include (paragraph 11.11): “making best use of the existing runway capacity at Stansted and development to its full use of a single runway at Luton.” Subject to this, it supports “the provision of two new runways in the South East in the thirty year period to 2030”, with the first to be at Stansted “as soon as possible ... with strict environmental controls,” and “development at Heathrow provided that stringent environmental limits can be met, including a new runway as soon as possible after the new runway at Stansted”. The Government’s assessment is that there “is a substantially better chance that the limits could be met in the 2015-2020 period.”

7.10 The White Paper goes on to “propose an urgent programme of work and consultation to find solutions to the key environmental issues at Heathrow and to consider how we can make best use of the existing airport.” Subsequently the DfT led “Project for the Sustainable Development of Heathrow” (PSDH) was set up to assess the environmental impact of adding a short third runway and/or “mixed mode” combined arrivals and departures on the existing runways at Heathrow. Work continues to determine whether or how the environmental limits set by the White Paper could be met, with the outcome of this assessment due for public consultation later in 2007<sup>7</sup>.

7.11 Reverting to the White Paper, the Government believes “that there is a strong case on its merits for a wide-spaced second runway at Gatwick after 2019 and that land should be safeguarded for such a runway, in case it becomes clear in due course that the conditions that we wish to attach to our support for the construction of a third Heathrow runway cannot be met.”

7.12 The Progress Report summarised progress to late 2006 subsequent to the White Paper. It further emphasised the need for aviation to recognise its environmental responsibilities, specifically endorsing the recommendations of the Stern Review<sup>8</sup> on Climate Change, and it also acknowledged the findings of the Eddington Transport Study<sup>9</sup>, including the economic importance attributed to aviation and airports.

## **Consistency of the FALP with Government Policy**

7.13 Against this background we look first at Policy 3C.6.

### **Policy 3C.6 Airport development and operation**

The Mayor supports the development of a sustainable and balanced London area airport system, and recognises that further runway capacity in the South East will be required to meet London’s needs. The strategic framework for the development of air travel in the UK over the next 30 years was published by government in 2003. Adequate airport capacity serving a wide range of destinations is critical to the competitive position of London in the global economy. The Mayor recognises that airport capacity must be sufficient to sustain London’s competitive position,

---

<sup>7</sup> GOL evidence.

<sup>8</sup> Stern Review: The Economics of Climate Change, HMT, 2006. CDL-CG059

<sup>9</sup> The Eddington Transport Study, DfT, 2006. CDL-CG001

although providing a level of capacity sufficient to meet unconstrained demand is untenable. The Mayor believes that the aviation industry should meet its full environmental and external costs but accepts there will still be a need for extra capacity to meet London's economic needs.

The Mayor strongly supports the Aviation White Paper's conclusion that, based on current evidence, any proposal for additional runway capacity at Heathrow should not be progressed unless the adverse impacts on air quality and noise can be sufficiently mitigated, and public transport access improved. On current evidence, adequate mitigation of these issues and of climate change impacts is not possible, and additional runway capacity at Heathrow is therefore opposed.

Airport operations should also give high priority to sustainability, including setting targets for and actively working towards increasing the share of access journeys by passengers and employees made by sustainable means, and taking full account of environmental impacts when making decisions on patterns of aircraft operation.

7.14 A significant number of individuals and organisations opposed the tone of the first paragraph of the policy as being too supportive of aviation development. But we see nothing inconsistent between it and the UK Government's position summarised above.

7.15 More contentious was the final sentence of the policy's second paragraph. The Mayor is expressly required to be consistent with his air quality and noise strategies, and these have not been challenged by Government. The "principal purposes" to which he must have regard include promoting the improvement of the environment in Greater London. He is expressly enjoined to have regard to the "health of persons in Greater London" and to achieving sustainable development in the UK and, on undisputed evidence, air quality around Heathrow does not currently meet World Health Organisation standards. Also, the requirement for consistency with National policies means the whole gamut of relevant policies, including those addressing air quality, noise and sustainable development, various elements of which can be read as offering support to the Mayor's position.

7.16 However, the Mayor's duties to promote "economic development", "wealth creation" and "social development" in Greater London might be seen as pulling in the opposite direction, as could be creating the economic foundations for "sustainable development".

7.17 Most importantly, the issues concern questions of merit and judgement that will be equally well known to Government. These self evidently include the analysis in the White Paper and Progress Report, balancing potentially conflicting considerations and constraints that could be posed by noise and air quality considerations. There is nothing in the White Paper paragraph 11.57, read as a whole, to suggest that mandatory air quality standards irredeemably cannot be met in future years, when better technologies and practices are seen as improving the prospects. Again self evidently, the Minister Tony McNulty's comment that the issues "were not easily overcome" is not just known to Government but an element of its position.

7.18 Unlike the run of thematic policy considerations and supporting analysis in the White Paper and Progress Report, which can be prayed in aid in more than one direction, the net outcome of Government policy for Heathrow remains

expressly stated, site specific, and must be assumed to incorporate the background considerations. The policy is clear, unambiguous and was updated only at the end of last year. Further development at Heathrow is supported in principle, contingent on stringent environmental limits being met. The Project to assess whether or how those limits might be achieved has yet to report. Until it does, the conclusion to the end of the second paragraph to Policy 3C.6 is premature and directly contrary to Government policy.

7.19 As an elected politician, democratically accountable to one of the world's major cities, the Mayor must of course be able to hold and express views independent of Government. However, the Spatial Development Strategy for London – the London Plan – is a statutory document with legal authority. Within its confines is a statutorily determined constraint in Section 41 of the GLA Act to ensure consistency with Government policy. We do not see GOL Circular 1/2000 paragraph 2.9 as creating sufficient leeway for a fundamental inconsistency with a policy specific to Heathrow, but rather as foreseeing potential variations from nationally applicable topic based policies, say on retailing, that might be justified by the particular uniqueness of London. We reach an unequivocal conclusion that the final sentence of the second paragraph of Policy 3C.6 needs to be deleted.

7.20 Doing so would not introduce inconsistency with other parts of the Plan nor lead to inconsistency with other of the Mayor's strategies or less specific, thematic Government policies. The outcome would simply no longer pre-empt the outcome of the PSDH. The ensuing paragraph 3.174 states that Policy 3C.6 is to be reviewed in the light of the outcomes of current studies on airport development; this is at odds with the Policy as it stands, which has in effect carried out the review before the outcome of a crucial study. We agree with the Mayor's suggestion that paragraph 3.174 would be improved by including an express reference to the PSDH. This would make paragraph 3.174 entirely consistent with the Policy, truncated as we suggest, leaving the way open for a review of the Policy when further information is available.

**Recommendation 7.1**

We recommend that Policy 3C.6 be changed by the deletion of the words "On current evidence, adequate mitigation of these issues and of climate change impacts is not possible, and additional runway capacity at Heathrow is therefore opposed."

**Recommendation 7.2**

We recommend that paragraph 3.174 be changed to include an express reference to the outcome of the Project for the Sustainable Development of Heathrow.

7.21 The complete recommended wording is below (Recommendation 7.5) incorporating also a further recommended change to this paragraph.

### **Stansted & Gatwick Airports**

7.22 Paragraph 3.175 states:

Whilst the expansion envisaged in the government White Paper at Stansted (and potentially later at Gatwick) should bring many positive benefits to London's economy, all necessary measures to address climate change and other environmental impacts and surface access impacts must be fully integrated into the development process, and in particular that appropriate transport improvements are put in place to support additional travel by public transport and road by both passengers, airport workers and freight / servicing traffic. The proposed expansion at Stansted (and potentially later at Gatwick) is therefore supported, provided that the environmental effects are satisfactorily mitigated and that sufficient additional transport capacity, particularly by public transport is provided. The provision of additional public transport capacity to serve the airports should not be to the detriment of non-airport passengers. Stansted has the greatest potential to bring regeneration benefits to stimulate development in the Thames Gateway and in the London-Stansted-Cambridge-Peterborough corridor, and Boroughs should ensure that full advantage is taken of the opportunities offered by promoting appropriate complementary employment policies in north east London, for example by implementing skills development programmes.

7.23 In his written statement in advance of the EiP session the Mayor said that he wished to modify this paragraph by deleting the sentence beginning "The proposed expansion of Stansted (and potentially later at Gatwick) ....".

7.24 This was supported by some and opposed by others. We have no doubt that the Mayor was right to seek the modification, and we would in any event have recommended it. In itself the sentence is not inconsistent with the White Paper and Progress Report, but we think it wrong for the London Plan to express different degrees of opposition or support for airport expansion within and outside the London boundary. As published, the FALP opposed expansion at Heathrow, subject to future review, while conditionally supporting it at Stansted and potentially at Gatwick. Subject to our recommendation above, the London Plan would, at least for now, drop express opposition to expansion at Heathrow and we consider that it should similarly drop even conditional express support for expansion at the other two airports.

7.25 We see no reason to recommend further modifications to paragraph 3.175, since foreseen economic benefits within London and the need to address surface access transport fall within the proper scope of the London Plan. These issues are in any event substantially already within the 2004 Plan, albeit differently worded.

#### **Recommendation 7.3**

We recommend that paragraph 3.175 be modified by deleting the sentence: "The proposed expansion at Stansted (and potentially later at Gatwick) is therefore supported, provided that the environmental effects are satisfactorily mitigated and that sufficient additional transport capacity, particularly by public transport is provided."



## Safeguarding Land at Heathrow

7.26 The White Paper (paragraph 12.2 et seq) notes that land outside existing airports needed for future expansion can be formally protected from incompatible development only once it is either reflected in a local development plan or when planning permission is granted for the airport development. Paragraphs 12.7 – 12.9 look to operators to produce and maintain master plans detailing development proposals, to inform the content of the Local Development Framework (LDF). The master plans are to take account of Regional Spatial Strategies, which should in turn take account of the master plans when they are revised.

7.27 The White Paper paragraph 11.67 looks to the airport operator, British Airports Authority (BAA), to take steps to safeguard the land needed for the option for a third runway at Heathrow. An associated plan shows a “Possible New Airport Boundary” but is annotated as indicative and not to be taken as a safeguarding map. BAA’s Interim Master Plan for Heathrow, published in 2005 for public consultation, retains an interim status pending the PSDH outcome. Amongst other things, it seeks to safeguard land outside the existing airport boundary for a short third runway. Annex A – a planning policy framework – shows the Interim Master Plan linked to LDF preparation by Hillingdon and Hounslow via the London Plan as the Spatial Development Strategy for London.

7.28 In fact the London Plan remains silent on this topic. BAA, GOL and some others urged that the FALP create the link by modifying Policy 3C.6 with an addition saying that: “The Mayor expects the relevant London Boroughs to safeguard land for runway development through their Local Development Frameworks as outlined in the White Paper 2003 and reiterated in the 2006 Progress Report.”<sup>10</sup>

7.29 The Mayor resisted this modification. Although we view the suggestion as one that can in principle fall within our remit, being closely related to the FALP on aviation matters, our conclusion is not to make such a recommendation.

7.30 Because of Heathrow’s national importance, the strategic steer for its future development has been set by Government. The FALP should not be inconsistent, for the reasons above, but we see nothing to require the Mayor positively to take the process forward at this time, against his evident own judgement. As advised in Guidance on the Preparation of Airport Master Plans<sup>11</sup>, the process for safeguarding land is more one for the operator, Civil Aviation Authority (CAA) and relevant local planning authorities. There is similar advice in PPG13: Transport<sup>12</sup>, at paragraph 6 including the final bullet point and again at Annex B paragraph 6.

7.31 We have no basis for expressing an opinion about whether the relevant Boroughs (Hillingdon appears to be principally affected) wish, or can be required,

---

<sup>10</sup> BAA written statement.

<sup>11</sup> Guidance on the Preparation of Airport Master Plans, DfT, 2004.

<sup>12</sup> Planning Policy Guidance Note 13: Transport, ODPM, 2001. CDL-CG047

to incorporate safeguarding in their LDF processes, based on the current Interim Master Plan boundaries. We note though that paragraph 913 et seq of the Master Plan envisages a process for doing so. Be that as it may, we have found no regulatory or even advisory guidance that can require the Mayor to “expect” or otherwise direct them to do so. The DfT Guidance document paragraph 59 expressly refers to “finalised” master plans as being the documents on which airport operators should “seek to ensure ... that their proposals are taken into account during the preparation of”, amongst other things, Regional Spatial Strategy.

7.32 There can be no doubt about the importance of safeguarding land requirements; paragraph 35 of the DfT Guidance describes it as “perhaps one of the most important issues master plans should seek to address.” Government has a range of powers of direction in plan making and development control that could be deployed if judged to be necessary and, to put the matter bluntly, we see any such responsibility as remaining with Government until the future of the airport is more firmly resolved. We see this as running with the theme of our recommendations on aviation, so that the FALP is consistent with but does not actively influence the outcome of Government policy.

#### **Recommendation 7.4**

We do not recommend that an additional clause be added to Policy 3C.6 with respect to safeguarding land at Heathrow for possible future expansion.

### **London City and Biggin Hill Airports**

7.33 The White Paper, paragraph 11.93 et seq, advises that “small airports have an important part to play in the future provision of airport capacity in the South East”, and goes on to say that to help them achieve “their development aims, regional and local planning frameworks should take account of the benefits that development at smaller airports could provide, and consider policies which facilitate the delivery of growth at these airports. The specific details of development at any airport should remain a matter of local determination through the planning system.”

7.34 London City Airport is one of the 30 airports identified by the DfT Guidance document, at paragraph 14 and the appendix, which should produce a master plan, and this has since been published in finalised form<sup>13</sup>. However, although the plan envisages substantial operational growth up to 2030, it disavows any requirement for physical enlargement, a new runway or increased hours.

7.35 Biggin Hill Airport is not identified by the DfT Guidance as requiring a master plan, but has produced one published in final form in January 2006. We understand that although this envisages adjustments of flight hours and

<sup>13</sup> Master Plan: London City Airport, November 2006.

development within the site, it disavows any physical enlargement or the construction of a new runway. We heard evidence regarding the value of this airport to London, in particular for business flights and for civil resilience in the face of an emergency. We suspect, however, that the development proposals are unlikely to be without local controversy.

7.36 The operators of Biggin Hill, Regional Airports Ltd, suggested specific modifications to the FALP, in essence to acknowledge the value of smaller airports and offer support to their roles. GOL supported these modifications.

7.37 The Mayor expressed doubts as to whether this should fall within the remit of an Examination of the FALP, but we consider that these two smaller airports are implicitly within its scope because they are expressly elements of the White Paper and this is very much at the centre of the whole aviation topic. That said, it is difficult to see what additional value the London Plan could contribute given that neither airport intends development (in the planning sense) giving rise to strategic rather than local considerations. We are sympathetic to the Mayor's aim to keep the length and complexity of the London Plan in check and agree with him that a simple reference to "all airports" in the supporting text to Policy 3C.6 should suffice. Our conclusions should not be taken as expressing views for or against the proposals in the two Master Plans.

7.38 We do not support the idea of adding Biggin Hill to the Key Diagram, let alone RAF Northolt, Farnborough and London Southend. The Key Diagram relates main airports to the growth corridors and there is no such strategic relationship between the corridors and these other airports. We are conscious that those who promoted and debated these points may feel that they laboured hard to limited effect, but we see no basis for more than the small modification suggested by the Mayor.

#### **Recommendation 7.5**

We recommend that paragraph 3.174 be altered to read: "Policy 3C.6, which applies to all airports in London, will be reviewed in the light of the outcomes of the current studies on airports development, including the Project for the Sustainable Development of Heathrow (PSDH) upon which consultation is expected to take place later in 2007."

7.39 This recommendation incorporates our second conclusion to the section above on consistency of the FALP with Government Policy.

#### **Surface Access to Heathrow**

7.40 Paragraph 2.23v introduces the Mayor's approach to (surface) transport in outer London, in brief looking to increased demand management of road use and continued improvements in public transport. These matters are taken forward in

Chapter 3C and in particular Policy 3C.1: Integrating transport and development, which sets out a range of measures.

7.41 Paragraph 3.171 retains, and enlarges, the Mayor's commitment to work more generally with Government and relevant regional agencies on cross border movement of people and freight. More specifically, however, the FALP deletes paragraph 3.172 from the 2004 Plan: "The Mayor will work with the neighbouring regions to consider how to take forward the Secretary of State's decisions on the ORBIT study of the planning and transport issues around London's periphery in ways that support the spatial strategies of this plan."

7.42 HA raised no objection to the deletion as such but sought an additional measure under Policy 3C.1, to implement Integrated Demand Management (IDM) as recommended by the ORBIT and Thames Valley Multi Modal Studies (MMS). At least as first raised, the Agency's concern was that without such measures there would be insufficient road capacity to support growth at Heathrow.

7.43 It should be noted at the outset that neither TfL nor BAA shared HA's concerns, and we may assume that both will have considered the issue critically, not least BAA who have a clear commercial interest in adequate surface access. In this context also, GOL made the very relevant point that airport master plans are intended not only to influence regional strategies but in turn to be influenced by the strategies, in this case of course the London Plan.

7.44 It is our understanding that the abbreviation IDM is frequently in full Integral (rather than Integrated) Demand Management, and that the ORBIT study was primarily focussed on the M25. Its recommendation for IDM included, amongst other things, traffic engineering techniques to manage road space through, for example, variable speed limits linked to CCTV monitored controls. We see nothing in the FALP that would deter HA from progressing such measures as judged desirable. The Thames Valley MMS has never featured in the London Plan so any reference to it must be peripheral to our consideration of the FALP. But to the extent that it has been raised, we reach similar conclusions with respect to the motorways and trunk roads leading west out of London. (In Appendix B we endorse inclusion of a reference to 'Airtrack'.)

#### **Recommendation 7.6**

We do not recommend that any modification be made to FALP with respect to surface access to Heathrow.

7.45 Somewhat surprisingly, HA pursued the issue of IDM more broadly, late in the process and outside our set agenda, as a critique of the fundamentals of the FALP. Our main conclusion is concern at what, at least as presented to us, appears to be a substantial degree of misunderstanding by the Agency of the background analysis to the FALP and the Mayor's underlying approach to transport. Very briefly, we endorse the Mayor's response in BN69 both with respect to the statistical analysis underpinning the FALP and the strategy being pursued.

7.46 In Chapter 5 we looked at the statistical analysis in BN7 and found it robust. The transport strategy includes a wide range of measures (not just congestion charging as was suggested) to integrate, in the full sense of the word, transport and development, including substantial investment to increase public transport capacity. We have been presented with some telling statistics: in the five years to 2005/6 there has been a reduction of 15% in weekday road traffic in central London, a reduction of 2% in the rest of inner London and growth of just 1% in outer London. Overall, traffic across London remained almost unchanged during a period when employment grew by 5% (219,000). We are unaware of any other comparable world city that could present such figures.

7.47 We do not intend to make any formal recommendation here but can see a need for better liaison and understanding between the Mayor and HA.

## Rail Freight

### *London rail freight bypass*

7.48 Policy 3C.24 addresses freight strategy. Aside from non-contentious updating, the only change introduced by the FALP is to delete a sentence “The development of a London rail freight bypass route is supported” and substitute “The development of national rail routes that relieve London of through freight is supported”. This rewording was questioned in some responses to the published FALP but Participants at the Examination were supportive, save that some sought to add a qualification “where possible” or “where practicable” to the new sentence.

7.49 The rewording is subtly different from the 2004 Plan and we think better. It no longer carries any implication of a single new bypass route that could obviate any through movement of rail freight across London, which all concerned recognised as unrealistic. Instead it simply supports a range of measures, on existing, upgraded or new routes, that could take a proportion of through freight onward around London. We were advised that this revision is consistent with the approach being taken in the neighbouring regions. The suggested qualification would be otiose. The policy does no more than offer general support and, as in most policies, it is implicit that a scheme would have to be judged possible and practicable – indeed on balance desirable – in order for it to be implemented.

7.50 As an adjunct to this topic we also looked at paragraph 3.215 which is part of the textual support to Policy 3C.24. The concluding section is implicitly intended to apply to rail freight capacity but we agree with the Mayor’s suggestion that this should be explicit to avoid any ambiguity. This would make the FALP change to this paragraph entirely consistent with the FALP change to the Policy itself, to broaden the concept of a rail freight bypass.

### **Recommendation 7.7**

We recommend that no modification be made to Policy 3C.24.

**Recommendation 7.8**

We recommend that the concluding sentence to paragraph 3.215 should read: "It supports the diversion of rail freight with neither an origin nor destination within London on to strategic bypass routes, and the development of additional rail capacity which can cater for the expected growth in container and other freight traffic and relieve rail capacity bottlenecks in London."

*Strategic Rail Freight Interchanges*

7.51 As published Policy 3C.25 addresses Strategic Rail Intermodal Freight Facilities, rolling forward this title from the 2004 Plan. As a minor update to the FALP the Mayor now proposes the policy to address Strategic Rail Freight Interchanges, the term used by the former Strategic Rail Authority (SRA). In itself this is non-contentious and we adopt the same term. The only change of substance to the policy is to incorporate a reference to Channel Tunnel rail freight; again in itself, non-contentious.

**Recommendation 7.9**

We recommend that Policy 3C.25 substitutes "Strategic Rail Freight Interchanges" for "Intermodal Freight Facilities."

7.52 The text supporting Policy 3C.25, paragraph 3.218, was however very controversial. The former SRA issued a Strategic Rail Freight Interchange Policy in March 2004<sup>14</sup>. This identifies a requirement for 3 or 4 large freight facilities on or close to the periphery of London, which in substance is repeated at the head of paragraph 3.218 in the 2004 Plan and the FALP. However, the FALP deletes the previous concluding qualification that "Any site promoted as a suitable location ... should be located wholly or substantially on previously developed land."

7.53 Those opposed described the paragraph's initial statement, regarding a requirement for the facilities, together with deletion of the locational qualification, as combining to create pressure for the release of tracts of Green Belt, or other open, normally protected land. In some opponents' minds, this was reinforced by cynicism about the value in practice of rail freight interchanges to transfer goods from road to rail, doubt about continued reliance on an SRA policy when that authority no longer exists and one or two Participants questioned the intrinsic benefits claimed for rail freight over road haulage.

7.54 We note first that although the SRA ceased to exist from early in 2006, the Department for Transport has issued a note, which remains extant<sup>15</sup>, advising that "the interchange policy was based on the Government's existing policies .... and

<sup>14</sup> Strategic Rail Freight Interchange Policy, SRA, March 2004.

<sup>15</sup> Status of the SRA Strategic Rail Freight Interchange Policy, DfT, 14 October 2005.

much of the material contained in chapters 4, 5 6 and 7 [of the Policy Document] is still relevant. For this reason we [DfT] will retain the document on our website as a source of advice and guidance.”

7.55 The indication of a need for 3 or 4 facilities in the vicinity of the M25 is in SRA Policy Document Chapter 6, and we see no reason to revisit the general support offered in Policy 3C.25, which in any event has been retained rather than introduced by the FALP, which define our remit. For similar reasons we see no reason to reassess the relative benefits of rail and road freight distribution, save the obvious point that there are important roles for both and that the two modes should be complementary.

7.56 Strategic Rail Freight Interchanges have demanding locational requirements including connections to major rail and road networks, somewhere between 40 and 400 ha of land and environmental constraints arising from their operations. We accept the Mayor’s contention that it may simply prove impossible to find such a site, let alone 3 or 4, substantially on previously developed land. It is inconsistent and unhelpful for Policy 3C.25 to offer support in principle, but qualified in a way that might make the outcome unrealisable in practice. We note too that “previously developed land” would not totally rule out the possibility of a Green Belt location.

7.57 We do not propose to recommend reinstating the requirement for sites to be on previously developed land. However, we feel it important that the resulting paragraph should not in any sense create a false impression of lowering the general stringent safeguards elsewhere in the Plan and in National policies to restrict development on open land undesignated for development, and especially within the Green Belt and Metropolitan Open Land. Those restrictive policies would be unaffected by the deletion. It would still be necessary for any application to build a strategic rail freight facility in, say, the Green Belt, to demonstrate that the benefits to their scheme surmount what would remain a very high bar to obtaining planning permission.

7.58 Material considerations would doubtless address points of merit directed to the particular application, that were raised in general terms at the EiP. These would be likely to include an appraisal of alternative, non-Green Belt, locations, sustainability and environmental issues, and whether the scheme were genuinely about rail freight rather than a Trojan Horse for inappropriately located warehousing. The appraisal would undoubtedly be demanding and wide ranging.

7.59 However, the revised suggested versions of paragraph 3.128 submitted since the Examination by the Mayor and GOL (BN62 & BN68) risk obscuring these points, because each in somewhat different ways focuses solely on considerations in the Mayor’s Land for Transport SPG<sup>16</sup>, which might convey an impression that these alone would be determinative. It would also contrast with text on smaller freight facilities, to which we turn next, where the FALP text expressly draws in wider planning and environmental considerations as well as the

---

<sup>16</sup> SPG: Land for Transport Functions, Mayor of London, 2007. CDL-LW04

SPG. We think it important that some similar clause be inserted in the text with respect to the large strategic sites.

7.60 There remains a difference (reflected in the above BNs) between the Mayor and GOL on whether the text should simply refer to the Land for Transport SPG or also expressly incorporate its assessment criteria. We understand GOL's desire not to see too much relegated to SPG, but we are also conscious that the criteria themselves were not part of the FALP process. We think that it would be wrong to elevate their status, by direct inclusion in the London Plan, when there has been no opportunity for public Examination of their merits. Also the resulting prominence could undermine the broadly based assessment that a specific proposal would warrant. We prefer the form of words advocated by GOL with respect to smaller rail freight facilities (considered shortly below) and recommend accordingly.

**Recommendation 7.10**

We recommend that paragraph 3.218 should read: "The former Strategic Rail Authority identified a requirement for three or four Strategic Rail Freight Interchanges on or close to the periphery of London. More information can be found in Land for Transport SPG. Any proposals for Strategic Rail Freight Interchanges will need to be assessed against strategic planning and environmental objectives."

*East of England RSS Proposed Changes Policy T10*

7.61 We are clear that there should be no cross reference introduced linking the FALP expressly with Policy T10, Strategic Freight Movement, in the Secretary of State's Proposed Changes to the RSS for the East of England<sup>17</sup>. To the extent that Policy T10 is general in nature, the FALP is compatible, and the FALP should not seek to influence any choice or outcome stemming from the provision sought in the Policy for at least one SRFI located outside London in that Region.

**Recommendation 7.11**

We recommend that there should be no express cross reference between the FALP and emerging Policy T10 in the East of England RSS.

*Smaller rail freight facilities*

7.62 FALP paragraph 3.218 goes on to revise the 2004 Plan with regard to smaller rail facilities within the urban area of London. There was general support for this but debate about the clarity of the drafting with respect to the process envisaged and the locational criteria.

---

<sup>17</sup> Secretary of State's Proposed Changes to the Draft Revision to the Regional Spatial Strategy for the East of England and Statement of Reasons, GO-EE, 2006. CDL-CG021



7.63 We agree first with suggestions to separate reference to smaller facilities from this paragraph, which is intended to support policy on larger strategic interchanges. As things stand in the FALP the two look confused. The more logical location is in support of Policy 3C.24 (referred to above) dealing with rail freight strategy in general. This would leave the way open to having separate clear supporting texts for each of the types of interchange. We recommend accordingly.

**Recommendation 7.12**

We recommend that a new paragraph 3.215ii be inserted: "There is also a need for a number of smaller freight facilities within the urban area. London has some small sites for general freight and some specialised rail terminals for particular commodities, many of which support the construction industry. These and further potential sites that might be identified by Transport for London should be protected in Boroughs' DPDs. More information can be found in Land for Transport SPG. New locations should meet strategic planning and environmental objectives."

## Chapter 8 Waste

### Introduction

8.1 The Panel Report following the Examination of the Early Alterations to the London Plan (EALP)<sup>1</sup> concluded (paragraph 9.44) that “a multiple criteria approach” should be adopted to identify a Borough level apportionment in tonnes for the management of Municipal Solid Waste (MSW) and commercial and industrial (C&I) waste. In response to this, the Mayor commissioned Jacobs Babtie to develop an apportionment methodology<sup>2</sup> to help achieve the targets for managing waste set out in the EALP. Following this methodology, a proposed apportionment for each of London’s Boroughs was reached. This was amended subsequently<sup>3</sup>, following further data of relevance coming to light, particularly pertaining to the London Industrial Land Release Benchmarks Survey.<sup>4</sup> In addition, following public consultation on the proposed apportionment, seven sensitivity tests were designed and applied to the updated apportionment model. In light of the consultation responses, it was clear to the Panel that the main points at issue were as follows:

- Is the Borough apportionment for waste management in the further alterations a robust assessment; and
- Should there be any variation in the recycling targets contained in the EALP.

### The Borough Apportionment

#### *Overview*

8.2 In examining this point, the Panel have considered the advice in the Companion Guide to PPS10<sup>5</sup> that “the apportionment process should not be based on an excessively detailed or precise forecast of waste arisings” (paragraph 6.43) and that “the process of annual monitoring and regular review will allow for adjustments to be made to apportionments over time” (paragraph 6.44). We have also had regard to the input from stakeholders and the four main objectives of the apportionment project as issued to Jacobs Babtie.

---

<sup>1</sup> Draft Early Alterations to the London Plan. Examination in Public 2006. Panel Report, September 2006. CDL-LW065

<sup>2</sup> London Waste Apportionment Study, Jacobs Babtie for Mayor of London, 2006. CDL-LW058

<sup>3</sup> London Waste Apportionment Study, Update and Further Sensitivity Testing, Jacobs Babtie for Mayor of London, 2007. CDL-LW048

<sup>4</sup> London Industrial Land Release Benchmarks, URS for Mayor of London, 2007. CDL-LW062

<sup>5</sup> A Companion Guide to Planning Policy Statement 10: Planning for Sustainable Waste Management, DCLG, 2006. CDL-CG032

8.3 Against this background, the Panel examined the various factors employed in the methodology to establish the apportionment and ascertained if they captured the latest base information on waste arisings, defined and employed the criteria in a fair and robust manner, applied proportionate weightings to the criteria and considered whether any of the sensitivity scenarios included in the update justified reviewing the current approach.

8.4 Modelling the apportionment figures for the London Boroughs had to be seen against several factors that broadly pull in the same direction. First, as the Panel have already noted London is unique in a number of respects. Second, in waste management terms London started from an extremely low base relative to most other regions and, consequently, has more to do than most to meet national management and recycling targets. Third, the uncertainty over transposing the Government's Waste Strategy<sup>6</sup> into London Plan policies for waste that has existed since the publication of the London Plan in 2004 has led to a lack of impetus in driving waste management forward. As a consequence of these factors, the Panel believe that there is an urgent need for certainty and broad acceptance by the Boroughs, if not full support, for the protocol adopted by the Mayor for the Borough level apportionment for managing waste.

8.5 In the Panel's view, there will no doubt be changes to the input values of the model as information is updated. Having said this, the need for a stable baseline from which the Boroughs can work, either in stand-alone or in conjunction with other Boroughs, should be assured as far as is possible at this stage. Bearing this in mind, we considered each element of the apportionment appraisal model to assess its robustness for future iterations in any plan and apportionment reviews that take place. Whereas it is obvious that there can be no guarantees as to the future, we firmly believe that there are no reasons evident at this stage for a wholesale rewriting of the apportionment protocol in any review. In reaching this conclusion, we have been mindful that a similar approach has been adopted in adjacent regions, with the uniqueness of London recognised by the addition of criterion 9 and the weightings of each criterion in the model run.

*The predicted arisings for municipal solid waste (MSW) and commercial and industrial (C&I) waste*

8.6 In achieving a meaningful apportionment figure for the Boroughs, it is necessary to consider how arisings in these two waste streams will develop during the Plan period. Historically, predictions such as this have rarely been accurate and there are a number of reasons why the Panel consider that it is no easier today. The level of arisings in both sectors will be dependent upon Government strategies and policies and the reaction of individuals and businesses to these and the overarching response to the effects of Climate Change. That having been said,

---

<sup>6</sup> Waste Strategy for England, Defra, 2007. CDL-CG056

---

we are convinced that the Mayor has adopted a sensible and pragmatic approach to fixing the trajectories for the future to 2020.

8.7 As a starting point, neither the Environment Agency nor GOL saw any compelling reason for varying the trajectory adopted by the Mayor at this stage. The Panel concluded in its Report into the EALP that the trajectory was based on the best available information and it is clear to the present Panel that, whereas there may be some indication that the growth in waste arisings is levelling off, or even reducing in some sectors, there can be no statistical certainty that this could be adjudged a consistent trend in London. In saying this, it is recognised that the growth in the latter years of the Plan is likely to be increasingly unreliable. Even so, the Panel do not support a scaling down of the figures. Having regard to the greater uncertainty in later years, we feel able to resist the urgings of the East of England Regional Assembly (EERA) and Essex County Council to carry forward projections to the final date of this London Plan ie 2026. Such figures would not be objectively based.

8.8 Insofar as the predicted arisings are intended to translate into the identification of land for waste management, we are convinced that to err on the high side is the only sensible approach. Counter to this, Thames Gateway London Partnership (TGLP) and the East London Waste Authority suggested that adopting a lower figure would make East London sites, with their lower land values, less attractive and this would aid proximity.

8.9 The Panel disagree for several reasons. First, while we appreciate that a flatter trajectory would result in a smaller land allocation overall, we anticipate that East London will always be more attractive, owing to its relatively low land values. Second, adopting a flatter trajectory would of itself not reduce the actual levels of arisings and, potentially, the mismatch could create a land shortage. Next, as central London Boroughs will be relying on redevelopment sites to create waste management facilities, it would reduce choice in the earlier years.

8.10 Finally, and perhaps most fundamentally, the main fear of those in the East London area seemed to be that it will be seen as a sink for the traditional style waste industries that prevail today. It is the Panel's strong conviction that the waste management protocol advocated by the Mayor will not lead to the creation of additional old style waste management industries, but the introduction of newer technologies that should be seen as an employment opportunity, albeit in some cases not generating great numbers of workers, in a cleaner and much more attractive built and environmental context. This itself, through the protection of existing waste sites, leads to their replacement and redevelopment by similar modern waste management techniques. It is also our opinion that the policies require management/disposal in one of the nearest appropriate installations and, as many of the East London Boroughs have a direct water frontage, the "nearest appropriate" may be translated into something less rigid than a simple distance measurement. A further point of relevance is that with the lower land costs within

the East London Boroughs, this should encourage rather than dissuade the introduction of new technologies and co-location with their generally inherent higher capital construction cost.

8.11 The Panel next consider the contention by Kensington & Chelsea and Hammersmith & Fulham that the growth in waste arisings should be an aggregation of Borough trajectories. This is not supported. In our opinion, this rests uncomfortably alongside the advice in paragraph 10 of PPS10<sup>7</sup> that warns against “spurious precision”, especially at a local level. More crucially, however, it seems to us that to adopt such an approach would make iterations of the apportionment model infinitely more difficult for the Mayor to oversee and would weaken the overall waste strategy and, thereby, provide the potential for delaying the preparation of waste DPDs. For these reasons, we fully support the London wide approach for this prediction.

#### **Recommendation 8.1**

We recommend that there should be no variation in the trajectory used to predict future arisings.

### **The criteria used in the apportionment appraisal**

#### *Suggestions for varying the criteria used*

8.12 Within the Study carried out by Jacobs Babtie<sup>8</sup>, Objective 2 utilised nine modelling criteria. Those making representations suggested a number of additional criteria and in Richmond’s case, the removal of criterion 9. A point well made by the Mayor reminded us that eight of the criteria adopted in the apportionment appraisal are similar to those used in the South East Region and the East of England Region, thereby going some way to establishing a common principle.

8.13 Nevertheless, looking at each of the points raised in turn, Westminster and Kensington & Chelsea considered that the high land values in central London Boroughs should be taken into account. In the Panel’s view, the cost of land is reflected to an extent in those criteria already employed in the model and in particular, criteria 1 and 6, which relate to the existing or potential capacity to manage waste and the existing movement of waste. In each of these cases, the cost of land within the central London Boroughs will have had a material effect on the apportionment figures for these Boroughs.

---

<sup>7</sup> Planning Policy Statement 10: Planning for Sustainable Waste Management, ODPM, 2005. CDL-CG032

<sup>8</sup> London Waste Apportionment Study, Jacobs Bapte for Mayor of London, 2006. CDL-LW058

8.14 More importantly, the Panel reaffirm the view expressed following the EALP (Recommendation W36) that central London Boroughs should do all they can to manage their arisings. More specifically, local management can be achieved through incorporating waste facilities into redevelopment proposals and safeguarding those existing, admittedly limited, opportunities for waste management. As mentioned earlier, wharfage opportunities are often available to these Boroughs.

8.15 The Panel would have been interested in some spin-off from the high cost of land in central London to support the intermediate and outer London Boroughs in their provision of facilities. Sadly, and however sensible and laudable this might seem, there appear to be strong legislative reasons why currently this form of trading does not represent a realistic option. Having said this, by working in conjunction with other Boroughs, as in the case of Kensington & Chelsea, there is the potential for offsetting high land costs and no doubt the opportunity to use high land values in the central areas in an innovative way to support waste management elsewhere. For these reasons, we do not support the view that high land costs per se should be a criterion.

8.16 Moving to the submissions by Camden, Greenwich, the North London Waste Authority and Lambeth, they contended that greater account should be taken of known facts such as existing contracts or those being negotiated and waste management proposals that are in the later stages of planning and construction. The Panel recognise that in any assessment there has to be a cut-off point when details arriving after the event cannot reasonably be taken into account. However, in this particular case, the Mayor confirmed that contracts are reflected in the assessment and that the Belvedere Incinerator, which though not yet constructed will have a regional impact, has been taken into account in the latest apportionment assessment. Whereas we agree that the latest information should be taken into account, there is insufficient detail in the representations to justify us recommending the inclusion of any further contracts/waste management sites. Accordingly, Belvedere apart, anything coming on stream after the current apportionment statement will have to be included when this is next reviewed.

8.17 Cory Environmental submitted that the criteria and general approach should embrace reality and other responses looked for 'ground truthing' or statistical sensitivity testing. In the Panel's view, this should be reflected when dealing with the various criteria and the weighting accorded to them. It is not seen as justification for including additional criteria.

8.18 Although Westminster advocated greater weight being afforded to those areas where there are opportunities for co-location, such as large employment areas or sustainable locations, the Panel have little sympathy with this view. Albeit some large sites are required where co-location can take place, there will remain a need for a large number of smaller sites where the 'ownership' of

recycling and recovery activities can be at a local level. Co-location of various waste management facilities will be driven by the industry, no doubt in conjunction with the Boroughs. It is not a matter for the Plan. One of the points well made by the Mayor was that virtually all waste management within London will involve a two stage process, requiring transport between the initial and final waste management facility. In our opinion, this further confirms the need for central areas to play their part, at least as far as first stage management pertains.

8.19 Kingston-upon-Thames raised two points, suggesting a stronger link should be forged between the arisings in each Borough and the apportionment figure and expressing concerns over the effects of lorry movements in the Borough, consequent on the apportionment exercise undertaken. On the first matter, the Panel are content that the apportionment methodology has had regard to this in the appraisal. The appraisal has essentially looked at the capacity of each Borough to manage its own arisings and, where this is not feasible, the programme has iterated into the next nearest available Boroughs that have the capacity and that meet the other criteria within the appraisal.

8.20 As for lorry movements, there is a strong emphasis on use of water-borne transport for waste and, albeit slightly longer term, a potential for greater usage of rail for movement of waste and especially export of recyclate. In the Panel's view, there is a certain inevitability that as the management of waste arisings increases, there will have to be more movement of waste and this will not always be by the most sustainable mode. However, where Boroughs are exporting waste, there is the opportunity to minimise loads by bulking up waste and planning conditions can influence the number and timings of vehicle trips and, thereby, lessen the environmental impact that these will cause. Accordingly, we see this as a matter that needs close monitoring when appraising waste proposals, but not something that should influence the strategic apportionment.

8.21 Next, EERA considered that the criteria should ensure that London becomes self sufficient within the Plan period. In the Panel's view, having regard to the conclusions reached following the Examination into the EALP (paragraphs 7.45 and 8.81) this is not seen as practical by 2020, though the period between then and 2026 should make this aim much more realistic. Frankly, if landfill is not available for London waste in the nearest regions, then for some time to come it will have to be transported even further afield, with the inevitable environmental costs that will imply.

8.22 Finally, although Richmond contended that social issues are not relevant to the identification and delivery of waste sites and certainly should not be included with a high ranking, the Panel take a different view. It is a fact that the consequences and impacts of land use impinge on the social aspects of life and environment. In an area such as London, with its ever increasing intensity of development, this is likely to be especially true. Moreover, the historical industries associated with old style waste management will no doubt have

influenced social deprivation and, thus, we agree with the vast majority of Boroughs that the addition and introduction of this criterion and its high weighting has gone some way to reflect the special nature of London and those living and working within it.

**Recommendation 8.2**

That there should be no change to the nine criteria used in the apportionment appraisal.

*The criteria used*

*(1) Capacity – identification of theoretical surplus/deficit in each Borough*

8.23 This is the most contentious criterion, and raised by far the greatest number of questions. The approach embodied in this criterion looks at the existing waste capacity within Boroughs and moves to identify the potential capacity of each of the Boroughs to manage further waste. Insofar as the first part is concerned, the model adopts a figure of 75% of licensed capacity for existing sites and this was disputed generally by a number of Boroughs and specifically by Enfield and Lewisham in connection with incineration. Within the sensitivity testing carried out by Jacobs Babbie, both 50% and 100% of licensed capacity were also tested and this produced very little change in respect of the relevant figures. EA confirmed its acceptance of the 75% capacity figure and with the information available we see little reason to disagree. Moreover, as the Mayor pointed out, taking the full licensed capacity of sites would over-inflate the existing figure and this would inevitably leave a shortfall in the identification of potential sites.

8.24 Moving to the question of incineration, the Mayor confirmed that the actual licensed capacity for the two existing incinerators had been taken into account and a realistic operational figure adopted for Belvedere.

8.25 On the central point, Camden contended that existing licensed capacity should not form a part of the assessment, as this was seen as inconsistent with the EALP requirement that replacement facilities should compensate for the maximum throughput. The Panel considered the possibility of treating the potential throughput of existing sites in a similar way to that adopted for potential sites. However, we are more inclined to the Mayor's view that to do this would produce an almost entirely theoretical approach to capacity, whereas making an assessment of existing facilities does make the best use of the available information.

8.26 There was some suggestion from the North London Waste Authority that it was incorrect to include existing sites as 'managing' waste as they fall short of the definition contained in the EALP. While it is accepted that there may be grounds



for doubting that some of the transfer station operations meet the required definition of managing waste, to adopt a site by site approach within the assessment model appears to the Panel to be far too complicated. Of note in this regard, Policy 4A.21i requires that if any existing waste management site is lost to a non-waste use, whether or not it complies with the definition of 'management' in the Plan, an additional compensatory site provision will be required that normally meets the maximum throughput that the lost site would have achieved. Incidentally, against this background, we foresee little likelihood of being locked into a particular technology for the future as suggested by the North London Waste Authority.

8.27 In similar vein, the suggestions by Greenwich that there was an underestimate of existing capacity might be correct, but inevitably this is a changing situation as new facilities come on stream and some cease operation or sites are redeveloped. Clearly all changes that are known about would be taken on board in any review and the exact position with regard to existing facilities can be reflected when Boroughs or waste authority groupings undertake preparation of their waste DPDs.

8.28 The question of small sites exercised a number of minds, including those at Hammersmith & Fulham. It was suggested in the representations that there was a site size cut-off figure of 0.25 hectares, below which they were excluded from the model input. The Mayor confirmed that this was not the case and that all existing sites had been taken into account. The Panel accept this and see it as consistent with Policy 4A.2 and Policy 4A.21i in the Plan.

8.29 Moving now to consider the future potential capacity, the figures contained in the FALP were subsequently updated by the Industrial Land Releases Benchmarks Survey and the results of this have satisfied a number of Boroughs. In particular, the apparent anomaly raised by GOL, that the final apportionment figure for some was greater than the potential capacity of a Borough to manage waste is no longer true. In the latest iteration of the model all Boroughs have a greater potential capacity than the apportionment figure.

8.30 The Mayor confirmed that the information available for some Boroughs was better and more robust than others. However, the latest figures are very much more accurate in terms of potential capacity than the earlier model runs (BN70). In the first apportionment figures given, only vacant land had been included, whereas the later figures made significant allowances for underused land and the fact that demand for industrial land is decreasing. Implicit in this is the fact that Boroughs will need to look proactively at land when considering their potential for waste management facilities. In this context, the inclusion of all potential land does explain the increases in identified employment land in areas such as Kensington & Chelsea. Within the figure for redevelopment, each year some 1% of the land stock is newly developed and this amounts to a figure of 50 hectares. The overall need for employment land is somewhat less and this gives the

potential for new waste facilities, especially in Boroughs that have a low level of industrial demand.

8.31 Several Boroughs suggested specific exclusions for certain types of land. For example Richmond looked for B1a usage to be omitted; Westminster pointed out that redevelopment sites in central London are covered by policies within the DPDs and these contain no waste management sites; and Kensington & Chelsea considered that all employment land allocated is needed for employment, leaving no room for waste uses. In answer to Richmond's point, the Mayor confirmed that B1a land had not been included and where a joint figure for employment land had been submitted, this had been disaggregated subsequently. As for the broader point, the Panel support the Mayor's view that industrial land should include wider employment uses, including its use for functional needs such as waste. This is highlighted in paragraph 2.25 in the FALP.

8.32 Next, the PPS3<sup>9</sup> requirement to look at the potential for utilising allocated industrial land for residential purposes was raised. London Councils also broached the more general question of competing demands on land. In the apportionment appraisal, Jacobs Babtie had looked through the London Housing Capacity Study<sup>10</sup> and omitted any sites allocated for housing within that. In addition, all sites with the potential for housing had also been excluded. Having said this, the Panel agree with the Mayor that it is necessary for Boroughs to 'top slice' when looking at the future uses for allocated employment land. In effect, this means that where there is a shortage of land for waste management purposes within a Borough, the Borough or waste planning authorities/groups will need to prioritise in favour of waste management uses.

8.33 Taking all these factors into account, we are satisfied that the Mayor has made the best use of information available and taken a sensible approach to both existing and potential capacity of land to meet the requirement for managing waste in the future. Accordingly, we see no reason to amend this part of the model.

8.34 On reaching this point, we look at the outcomes of the model run where two basic issues are raised. The first, dealt with previously (paragraph 8.29), is the point raised by GOL and others that the apportionment figures for some Boroughs are above the existing capacity combined with the surplus apportionment capacity. As noted, the latest URS Survey has removed this anomaly (BN70). Incidentally, GOL noted that the figure for the throughput of potential sites of 80,000 tonnes per hectare is too high, especially when compared with the figure implicit in the EALP of 40,000 tonnes per hectare. Of course GOL was correct, but as the Mayor pointed out, this had no effect on the apportionment figure, but merely helped rank an authority's ability to manage waste.

---

<sup>9</sup> Planning Policy Statement 3: Housing, DCLG, 2006. CDL-CG028

<sup>10</sup> 2004 London Housing Capacity Study, Mayor of London, 2005. CDL-LW026

8.35 The second point emanates from the submission that some, such as the North London Waste Authority, have current proposals to manage 100% of their MSW arisings and that Boroughs such as Enfield and Lewisham have apportionment figures that are less than their existing capacity. The first point to draw out is that the requirement to manage waste in each of the Boroughs covers the aggregate of MSW and C&I waste, not just MSW. In addition, there is the facility for waste planning groups to meet the requirement for their constituent Boroughs over the whole area and not specifically to manage the apportionment figure of any particular Borough in that Borough alone.

8.36 Next, there is nothing to suggest that Boroughs should not provide more waste facilities than their apportionment figure requires. The apportionment figures are minima and not maxima. This will be supported by the Mayor and the Panel see that, where there is a capacity to accommodate further waste facilities, this will be an opportunity to embrace the new technologies and update those facilities that do not meet the definition of waste management evinced by the EALP or that have adverse environmental impacts.

8.37 It is possible, of course, that some Boroughs where capacity already exceeds the apportionment figure may rest on their laurels. The Panel, also, accept that there may be the potential for some Boroughs to attempt manipulation of the apportionment figures in management terms, but this should not be seen as a justification for abandoning the basis of this criterion. In particular, this might pertain to those Boroughs where incinerators are located. However, the move is to use incineration post recovery and it is the creation of this feedstock that offers the greatest regenerative waste management possibilities.

*(2) Proximity to waste arisings*

8.38 Several representations were made about proximity in the context of sustainable travel. This matter is dealt with by the Panel in paragraphs 8.39-8.46. This leaves Greenwich's point that criterion 2 constituted double counting of the industrial land availability tested under criterion 1. Essentially, it is dependent upon, rather than independent of, the capacity criterion and, thereby, allied to both criteria 1 and 6. In response to this, the Panel agree with the Mayor that it is sensible in Boroughs where there is a surplus of arisings over management capacity to consider the available or potential capacity in the nearest adjacent Boroughs. In effect, this is how we understand the model to have worked. Whereas it is clear that the creation of management facilities close to a surplus would not guarantee their use, it does provide an opportunity, which offers both financial and environmental incentives for Boroughs with surplus waste arisings. Thus, we support the Mayor's approach in this regard.

*(3) Proximity to sustainable transport modes*

8.39 The two modes of travel under consideration here are rail and water. Insofar as both modes are concerned, they offer the potential for more sustainable movement of waste. The Panel appreciate that the proximity to rail and water will not necessarily guarantee the ability to make use of them, but this factor is dealt with under criterion 5. Clearly not all rail lines included in the assessment are capable of transporting freight or for that matter, neither is having access to a water frontage the same as a Borough having a suitable wharfage. Even so, we support the Mayor's inclusion of this criterion on the basis that sustainability must be a key driver.

*(4) Proximity to the road network*

8.40 Under this head, Westminster raised concerns about the use of road densities as opposed to road lengths and the Riverside Waste Partnership contended that an overall average speed for the London area should be replaced by a Borough-by-Borough figure. On the first point, an assessment was modelled during the sensitivity testing and the results were fairly predictable. The larger Boroughs in terms of area received increases in the apportionment and the smaller ones, a lower apportionment figure. These varied as much as  $\pm 50,000$  tonnes on the base figure. As a consequence, the Panel accept that there is some justification for using road lengths instead of road density. However, after considerable thought we believe that the road density input should be retained, on the basis that this should minimise HGV usage of poorer lengths of highway and passing through residential or other sensitive areas. In addition, we are mindful that the central London Boroughs, where using road lengths reduces the apportionment figure, do tend to have much greater proximity to a water frontage and it is hoped that this will be seen as an incentive, if not an opportunity.

8.41 The second point does seem more fundamental. The Riverside Partnership propounded the view that the average speed adopted for all the London area is unrealistic and average speed should be taken on a Borough-by-Borough basis. Once again, we agree that this constituted a reasonable argument and accept that this offers a further refinement. However, although this has not been sensitivity tested, we do not anticipate the same variation in figures as for road density versus length and we are again mindful that PPS10 seeks to avoid "spurious detail" when dealing with this type of criterion. Accordingly, although the Panel accept that there may be some justification for varying the input on proximity to the road network, we are satisfied that the outturn does not disadvantage any Borough unduly. Accordingly, no change is recommended to the input for this criterion.

*(5) Ability to use sustainable transport modes*

8.42 London Councils, East London Waste Authority and Bexley argued that there is sufficient rail freight capacity information available today, to enable this

aspect to be taken into account now and not left for further iterations of the model. In similar vein, the East London Waste Authority submitted that the lack of consideration of rail access has distorted the weighting afforded to river access and wharfage. Greenwich also contended that the wharfage identified is exclusively used for transporting fill and aggregates, and would not be available for movement of waste. Greenwich pointed out that aggregates are a vital import, essential to achieving the predicted growth rate for London.

8.43 Insofar as rail is concerned, this plays very little part in the movement of waste at present. Moreover, the nature of London's waste and its future management is likely to involve a large element of double handling. The road network is, therefore, always likely to carry the bulk of first stage collected waste. Following this, there is potential for the bulk removal of waste and recycle from the London area to the larger recycling collection depots and the Mayor is working towards a regional approach to markets. As for a list of possible rail connections, TfL is in the process of preparing this. However, it has not been finalised and it does involve complex and numerous variables. Even then it will be the subject of consultation with stakeholders. Thus, whereas the Panel recognise that an input figure for rail connections would be a very desirable benefit to the model, we are forced to accept that there is insufficiently robust information to justify including this at the present time. Accordingly, we reluctantly accept the Mayor's approach in this respect.

8.44 Turning to the question of river access, here the wharfage capacity is known and, although some suggest that usage is restricted, the Panel are not convinced. Essentially, in those locations where aggregates are imported by river, there is frequently an empty vessel making the return journey. As Biffa Waste pointed out, this represents an opportunity for backfilling and export of waste recycle and possibly bulk waste transfer, where the opportunity offers.

8.45 As for the potential distortion by not including rail, the Panel do not see this as a disadvantage. A feature of the London Plan is to promote and encourage the use of waterways and, paradoxically, the lack of rail information serves the interest of this strategy.

8.46 Two other matters were raised under this heading. First, Richmond expressed concern about the suitability of infrastructure and, therefore, the opportunity to link with the closest Boroughs. As noted earlier, in London waste management is very likely to involve a two stage process including road transport in the first phase. Thus, while Richmond may lack sustainable infrastructure connections, it will still have to manage or export its waste by road. In fact, the more cynical might suggest that better infrastructure connections might act as a disincentive to Boroughs such as Richmond to manage more of their own waste within their boundaries.

8.47 Finally, the South West London Joint Planning Group drew attention to an indication given by the Mayor that he supports sub regional self-sufficiency. The Mayor confirmed that this had not been taken into account in the apportionment appraisal and we, therefore, consider that it is not necessary to comment further on this anecdotal evidence. The Panel has reached a similar view in Chapter 4.

*(6) Historic patterns of waste movement*

8.48 We have looked at existing and emerging waste contracts earlier and the Panel would be concerned if this appeared to be perpetuating old style waste disposal, as opposed to more sustainable forms of waste management that are higher in the waste hierarchy. However, after giving some thought to this, we are satisfied that if it is a problem, it is small in magnitude and of a relatively short term duration. This is because there is so little current capacity for waste management in London. Moreover, in many cases even this does not meet the definition of waste management expounded by the EALP. In addition, there is the ability of Boroughs, either already in formal groupings or linked on an informal basis, to pool their apportionment figures. This is being done by some today and, consequently, we believe it is right to include some allowance for historic patterns. In some ways not to do so might be seen as prejudicing those Boroughs that have been most progressive.

8.49 Riverside Waste Partnership raises the interesting prospect of waste exported from London Boroughs to incinerators only to have waste from other Boroughs imported to meet their apportionment target. If this were the case then it would raise a sustainability issue. However, once again the Panel see this as short term. The clear intention within the waste policies is for the management of waste with recovery first and only then for the residues to be incinerated. Clearly this change in feedstock will take some time to achieve, and logic suggests that this timescale is very likely to be extended once Belvedere comes on stream. Even so, as it constitutes a key desire, implicit within the London Plan, it should remain embodied in this criterion. Moreover, as the Mayor points out, this anomaly may well act as an impetus for local management of waste arisings rather than export of raw waste for incineration.

8.50 The final point under this criterion was to confirm that the waste that will be attracted to the Belvedere Incinerator had been taken into account in the 'historic' patterns of waste movement. This was confirmed by the Mayor.

*(7) Other land uses/environmental factors*

8.51 A whole tranche of objections from many Boroughs, particularly those with many listed buildings and conservation areas raised concerns about the potential for siting waste management facilities in or near such locations. Similar arguments were advanced by Lambeth in connection with the CAZ and by

Kensington & Chelsea and the Riverside Waste Partnership over proximity to residential areas.

8.52 Insofar as design is concerned, the Panel appreciate that it may present significantly more of a challenge to locate such functional activities as waste management facilities within generally sensitive locations. However, this is largely a matter of design and over the years sewerage features, substations and even power stations have all been accommodated in or close to such locations and certainly fall within land mark views. A clear component in this argument is that the new waste management facilities should be manifestly different from the dirty and environmentally negative operations that have been associated with the waste industry hitherto.

8.53 The Panel reach a similar conclusion with respect to residential locations. Within any residential development, existing or proposed, it is possible to introduce features where residents may have a direct involvement with management of their own waste. For newer, larger schemes, waste management or combined heat and power schemes should be master planned within the development. Once again, it is a matter of planned mitigation and judicious use of conditions to control particular activities to acceptable levels and restrict some operations to certain times of the day. The example of residential development at Highbury in Islington, seen by the Panel during consideration of the EALP, illustrates a community example living alongside and even above a large scale waste management facility. We believe similar arguments should apply to redevelopment in CAZ and this is consistent with Policy 4A.2.

8.54 On a detailed point, Lambeth identified errors in the allocation of Metropolitan Open Land for Camden and Kingston-upon-Thames and Green Belt land in Richmond. The Mayor has checked these figures and found that they remain uncorrected in the latest iteration. Although the Panel acknowledge the corrections would result in only small changes, in the interests of the integrity of the Plan, we advocate that the facts should be correct wherever possible.

### **Recommendation 8.3**

We recommend that the correct figures for Green Belt and Metropolitan Open Land are used as the input or control figures within this criterion.

#### *(8) Flood risk*

8.55 Despite the contention that flood risk areas had been omitted, the Mayor confirmed that these have been taken into account. The Panel are mindful that, subject to tests, PPS25<sup>11</sup> does allow some waste treatment facilities to be sited within flood plain areas. Accordingly, we recommend no change to the input to

---

<sup>11</sup> Planning Policy Statement 25: Development and Flood Risk, DCLG, 2006. CDL-CG036

this criterion, while recognising that the final Regional Flood Risk Assessment will become available late in 2007.

8.56 On a point of detail, it was said that the flood risk map (reference: BO263200/008) used in the model is inaccurate with respect to Crayford Marshes/Crayford Ness areas, which contain substantial employment areas. EA has checked that the most up-to-date version has been used in the final run of the model and found this not to be so. As this is again a factual matter we recommend accordingly.

**Recommendation 8.4**

We recommend that the correct figures for the flood risk map are used as the input or control figures within this criterion.

*(9) Socio-economic factors*

8.57 Under this head, the Riverside Waste Partnership contended that the ranking of deprivation should not be a straight line, but should be based on a plot of the underlying scores. The Mayor confirmed that this approach had been sensitivity tested and it had produced a very minor variation in the figures. On this basis, the Panel agree that no change is necessary.

*Summary*

8.58 After consideration of the inputs to the nine criteria adopted in the apportionment assessment, the Panel accept that there could be small refinements in certain areas that might produce modest changes. However, in many cases these involve extra detail down to Borough or sub-Borough levels and this is not the intention of the apportionment exercise as envisaged by the Companion Guide to PPS10. Accordingly, apart from one or two minor factual inaccuracies, we conclude that to use the criteria and the input figures represents a robust and relatively sensitive appraisal along the lines envisaged by the Panel after the Examination into the EALP.

*Updated apportionment*

8.59 Within the latest apportionment carried out by Jacobs Babbie the Belvedere Incinerator was taken into account, along with updated information on wharfs and indicative capacity of land. There is little disagreement about the inclusion of this information, though Bexley questioned the change in its apportionment figure of only 0.1%, even after Belvedere comes on stream. At first glance, this seems hard to understand, but the Mayor confirmed that the benefits to Bexley's current capacity with the inclusion of Belvedere, were almost entirely offset by the new information on wharfs. On this basis, the Panel support the updated and revised criteria values embodied in the most recent apportionment.



---

*Does the weighting of the criteria lead to fairness in delivering a Borough apportionment?*

8.60 When undertaking the apportionment exercise, the weighting allocated to each of the criteria was voted on by the attendees at the stakeholder meeting. In each case, the model ‘adopted’ the weighting voted for by the majority. This approach raised a number of questions in respect of the principle of adopting a more subjective as opposed to an objective approach like a sustainability appraisal of the weightings. Like GOL, the Panel have some sympathy with the desire for a more objective approach, especially where the voting by stakeholders was relatively close. However, the Mayor correctly points out that there is already a significant number of sustainability criteria employed within the model itself. If one then added a further sustainability appraisal for each criterion then this could lead to distortion in the weightings applied and attract more criticism from the stakeholders. We understand from the Mayor that the September iteration did have an overall sustainability appraisal. Even so, the PPS10 Companion Guide does not require such detail as carrying out one for each of the criteria, and we appreciate this would be very cumbersome and, as factors will be changing continually, certainly far less stable. On balance, therefore, and despite the arguable lack of objectivity, we are content to support the principle of the stakeholders deciding the weighting for the criteria. Pragmatically, we feel that the Boroughs are more likely to accept ownership of the apportionment following full stakeholder involvement.

8.61 Moving on to specific points raised in the representations, we have already dealt with the problem (paragraph 8.30) with the early model iteration raised by Enfield & Lewisham that existing licensing of some Boroughs exceeds the apportionment figure has been resolved by the updated land capacity figures. Next, South West London Waste Authorities contended that it is unfair that some Boroughs such as Barnet have not been apportioned the London average for managing C&I waste. We disagree. In the first place, an average is just that and to elicit an average figure some Boroughs must have an apportionment above and some below. Perhaps more fundamentally, to adopt a cut-off such that all London Boroughs meet the average apportionment would not be an objectively based criterion. In fact, the Panel believe it would represent a far cruder exercise than that carried out in the apportionment appraisal, which looked at a relatively wide range of factors. Thus, whereas at first glance this might seem anomalous, it does not represent the reasoned position. We note, also, that Barnet is a member of the North London Waste Authority and, as such, may eventually assume responsibility for a figure above its apportionment or, paradoxically, below it.

8.62 Some concern was expressed over the low weighting given to flood risk. For example, TGLP submitted that the flood risk is severely underrated in the appraisal following the tragedy at New Orleans and more recent events in the UK. EA lends some support for this by stating a preference for no waste development in the flood plains. Whereas the Panel have considerable sympathy with this

approach, we have already noted (paragraph 8.55) that PPS25, which constitutes the Government's policy statement on such matters, does allow some waste treatment facilities to be constructed in flood plains and, in some cases, overcoming flood risk is a matter of design. Even so, there would have to be a specific flood risk assessment for each site and in meeting its legislative obligations EA could bring significant weight to bear if it had reasons to resist a particular project. On this basis, a low weighting for this criterion appears justified.

8.63 Once again, we view future waste management much more positively than some such as TGLP. While we accept that waste development does not necessarily generate the highest density of employment, we have more sympathy with paragraph 9.17 of the Panel Report into the EALP, which looks to waste management as a regenerative opportunity.

8.64 On another point, the South West London Joint Waste Planning Group and Kensington & Chelsea considered that insufficient weight is given to the source of the waste. Conversely, others believed it to be about right. After weighing both views, the Panel consider that the source of waste has been taken into account in the appraisal under criterion 2, but it is correct that far more weight should be given to the ability of Boroughs to manage the waste, whether that be from arisings within or external to a particular Borough.

8.65 Representations, including those from the Riverside Waste Partnership and Hammersmith & Fulham, argued that the weighting for existing and potential capacity to manage waste should be artificially inflated to a level of 66%, with the weighting for all other criteria reduced accordingly. This exercise was carried out as one of the sensitivity tests by Jacobs Babtie and it had the effect of reducing the apportionment figures for inner London Boroughs, while increasing those for the outer Boroughs. As it has always been contended that the inner London Boroughs should make every effort to manage their respective arisings, this is inconsistent with artificially increasing the weighting in respect of capacity. Moreover, the Panel would be concerned that affording such a disproportionate weighting to capacity would undermine many of the sustainability criteria embodied within the appraisal, not least use of waterways for transport. Finally, we are mindful that by combining criteria 1 and 6, as the appraisal has done, both with high ratings, capacity is already afforded considerable weight in the appraisal.

8.66 For these reasons, we are content that the weightings accorded the various criteria in the final apportionment figures are acceptable and can be supported as fair on the basis of rationale and particularly as a consensus view of stakeholders.

*Future updates of the apportionment*

8.67 In future years the apportionment figure will be remodelled employing the most up to date information as it becomes available. The primary concern of some was that this will make it difficult for Boroughs and waste groupings when preparing their DPDs. Essentially, the apportionment figure might vary from year to year, whereas the DPD will be planning 10 years ahead and usually reviewed only on a 5 yearly basis. Some suggested, therefore, that an annual, updated iteration of the apportionment figure should be produced to aid the preparation of DPDs.

8.68 The Mayor pointed out that the apportionment figures are merely a means to an end. Their key function is to drive the management of waste up the hierarchy and away from landfill. As the position stands at present, the current apportionment figures have not been incorporated into the preparation of DPDs and so this apportionment figure represents a baseline for all. The Mayor anticipated that the offer of a regular iteration is likely to lead to delays in producing DPDs. The Mayor also pointed out that the policies in the FALP positively encourage pooling of the apportionment figures and TGLP pointed out that these are effectively flow targets for the more reluctant Authorities.

8.69 On this matter, the Panel have mixed views. We recognise the advantage of updates for such cases as aggregate production and could see some benefits from a similar approach for waste apportionment. However, recent history has shown that, unlike the general support for winning aggregates as a prerequisite to investment and development, the London Boroughs are unlikely to embrace the Mayor's waste strategy with similar alacrity. As such, we foresee that an annual or biennial iteration could present the Mayor with resource difficulties in defending his position at DPD Examinations and introduce avoidable friction between the Mayor and Boroughs. Bearing in mind London's very low starting position, anything that could be used to delay identification of suitable land for waste facilities and their subsequent construction and operation should be resisted strongly. In the Panel's view, the Mayor's Waste Strategy should assist the situation and, while accepting that the value of a Borough's apportionment figure is important, we firmly believe that the Mayor deserves some degree of constancy in the figures, to encourage catch-up from the current lowly waste management position to that envisaged by other policies in the FALP. Accordingly, we support further iterations of the apportionment figure when other appraisals and reviews of the London Plan or Waste Strategy (See PPS10 paragraph 4) take place and not at any predetermined time.

**Recommendation 8.5**

Alongside endorsing the apportionment protocol and, subject to the recommendations 8.3 and 8.4 above, the resulting figures, we recommend that reviews of the apportionment figure should take place when the

London Plan is reviewed or substantial alterations made to the waste Chapter or Strategy.

**Should there be any variation in the recycling figures contained in the early alterations?**

8.70 The Mayor included a change in the recycling targets for MSW within the FALP, but this was not emphasised in the appropriate and accepted manner, by the use of heavy type. Friends of the Earth (FoE) drew attention to this and argued that this failure led to a situation where the recycling targets did not attract the level of comment that might otherwise have been expected and this has inhibited the debate about whether these updated figures should be increased even further.

8.71 When addressing the philosophy behind the production of recycling targets, the representations fall into two camps. On the one hand, there are those who submit that the figures contained in the Plan should not be aspirational, but realistic, reflecting what is likely to be achieved within any given timescale. On the other hand, there are those, including London Councils (BN73) who argued that the figures contained in such documents should assume a level above realistic expectation, in the hope of encouraging those involved in waste management to work harder to attain the stated goals.

8.72 When looking at this matter, it should be noted that there are differing definitions for MSW in the London Plan and household waste in the Government's Waste Strategy for England 2007. Consequently, there is some difficulty in a direct read-across between the two. In response to this, the Mayor pointed out that comparison could be made between MSW in the Plan and household waste as defined by the 2007 Waste Strategy. For example, a 45% recycling and composting target for MSW by 2020 would be the equivalent of a 50% household waste target by 2020. While accepting that this might serve as an approximation, the Panel can understand the position adopted by London Councils, GOL and EA. In addition, the representations make clear that, to reduce their Landfill Allowances Trading Scheme (LATS) obligations, several Boroughs will seek to divest themselves of responsibility for managing that proportion of the C&I waste stream currently falling within their remit.

8.73 For these reasons, we think this 'anomaly' should be looked at in future Plan reviews. However, change should not be for change's sake or even consistency with the other regions. The Mayor's position reflected what is happening in London at present. He set a target for something that is measurable in London and, of course having regard to the definition of MSW contained in the GLA Act. If London is different in the way it manages waste, and continues to be different, then there seems little point in setting an arbitrary target, which will not be understood in the context of London waste. At this stage, a review seems to represent a complex exercise and not one the Panel feel competent to undertake with the information in our possession.

8.74 Turning to the case for setting higher targets, FoE believed this produces innovation and movement up the waste hierarchy. From the Mayor's perspective, he was comfortable with the targets for MSW given in the EALP of 30% in 2010 and 33% in 2015. On this basis, he believed it was sensible to stretch the targets somewhat further.

8.75 The Panel take the view that there has to be a balance between aspiration and reality. As it stands at the present time, there does not seem to be any objective basis for the figures embodied in the FALP. Essentially they are entirely aspirational and this conclusion is supported by EA's figures for MSW of 18% and household waste of 21% in 2005, based on Defra figures. As London Councils contended, the uplift necessary between 2005 and 2010 to meet even the EALP target looks unachievable, having regard to the pace at which meaningful waste management facilities are coming on stream.

8.76 Having said this, the Panel recognise that there is a need to promote the extension of current management levels and encourage innovation. Thus, we agree that the figures quoted in the Plan should be above the trajectory projection to encourage new ways of thinking and promote change. As to how far they should be above is a matter of debate. On reflection, we judge that the aspirational figure should not be more than 20% above the extrapolated figure based on achievement. To insert unrealistic figures, incapable of objective justification, is likely to lead to discouragement and a failure to meet the targets could undermine other Plan policies. Although we again considered changing the figures, we decided on balance that we would not be making a wholly informed decision and that it should be left to the appropriate agencies at the time of the next review. This approach also has the benefit of allowing the Mayor's Waste Strategy to have had some time to evolve.

8.77 We turn next to the FoE's contention that even higher targets should be included, to prevent waste management moving down the hierarchy and, as a consequence, producing more residual waste. The Panel can appreciate their point. However, as indicated previously, we do not favour entirely subjective recycling targets. Having said this, three particular factors militate against FoE's fear. The first is the Government's promise to continue the escalation of landfill tax for the foreseeable future. This alone should divert an increasingly significant proportion of the waste stream from landfill. Second, there is the rapidly reducing landfill capacity itself. It is fairly clear from the East of England RSS and the South East England RSS that the landfill capacity available for London waste in these regions will diminish at a rate that will necessitate radical action within the London area. In fact, these Regions look for less landfill within their regions post 2015 than the FALP indicate. Third, there is the London Plan definition of management, which of itself should reduce residues.

8.78 Biffa proposed an entirely different approach, and suggested that rather than including unachievable recycling targets, the Plan should consider a robust assessment of carbon impacts of waste management as the target measure. The Panel have considerable sympathy with this view, bearing in mind it would be objective and could be seen in the same context as Climate Change. However, for ease of understanding we believe that the calculation and assessment will have to be much simpler before devolving ownership and responsibility of such a thesis onto Boroughs and in turn industry and the public. In addition, it seems to us that, if judged sensible and pragmatic, this approach should be initiated nationally and not regionally and, therefore, something Government might lead.

8.79 To conclude on this point, the Panel support the raised recycling targets included in the FALP, subject to a more objective assessment in the next review along the lines suggested.

8.80 Moving to consider C&I waste, the Mayor accepted that the 70% figure for recycling in 2020 is challenging, but believed that it is achievable. In 2004 the national figure was 44% but, although recognising that some C&I waste is included within the MSW figure, EA figures showed recycling of the balance of the C&I stream in London is currently a lowly 9%. From the information available, the Panel have not found it possible to deduce an accurate figure for all C&I waste, but fear the reality of the submissions that indicate that use of the word 'challenging' might be code for a significant target shortfall. In fact, the early years could see Boroughs becoming disheartened with a large deviation from the necessary trajectory. Having said this, we understand the 70% figure emerged from a discussion with stakeholders as the maximum they felt could be achieved. Importantly, if London is to catch up with the remainder of the country then it is necessary for them to move faster than anyone else during this period. Despite the doubts, for these reasons we are content to accept the figure, but again look for a more objective assessment in any review.

8.81 There are no concerns about the excavation, demolition and construction recycling and reuse figure.

**Recommendation 8.6**

We recommend that the increased targets for recycling, reuse and composting waste set by the FALP are supported, subject to reviewing the need for differing definitions of MSW and household waste and to a more objective assessment limiting the targets to a figure no more than 20% above the extrapolated figure based on current returns, when the Plan is next reviewed.

## Minor matters

8.82 Within the list of minor matters the rewording of Policy 4A.2 is now inconsistent with the wording in PPS10. On reflection, the Mayor is content to leave the wording as per the draft FALP. The Panel support consistency between the two documents.

8.83 The Riverside Waste Partnership said that Table 4A.4 concerning disaggregation needs to clarify that provision to manage the Borough apportionments for MSW and C&I waste streams need not be met separately. Considerable discussion took place around this topic, with many stating a preference for one table showing the arisings disaggregated and another showing the apportionment figure aggregated. In the Panel's view, it does need to be clear that Boroughs or waste groupings do not have to meet each of the apportionment figures in a disaggregated way.

### **Recommendation 8.7**

We recommend that the Plan makes clear that it is not necessary to meet both the MSW and C&I waste apportionment figures individually, but as an aggregate figure. In addition, it is further recommended that Table 4A.4 produced in the Plan reflects this in an understandable way. We recommend that to achieve this, both the aggregated and disaggregated figures should be included.

8.84 London Councils raised a related point requesting that there should be recognition that managing waste can be undertaken on an individual Borough basis, by groupings or in accordance with paragraph 4.10g of the FALP (introduced by the EALP) at an appropriate installation outside the London boundary. They contended that this is a direct consequence of the apportionment exercise and needs to be made clear in the text. The Mayor fully accepted that this is the intention within the Plan and the Panel support this view. Any other interpretation would undermine the positive encouragement elsewhere in the London Plan for Boroughs to work together. We recommend, therefore, that a sentence is added to Table 4A.4 making this clear. Notwithstanding, it should be made equally clear that although management of waste arisings of a particular Borough may take place at an appropriate installation outside London, this does not exempt that Borough from allocating the necessary land within the Borough boundary, or within conjunction with other London Boroughs, to manage the Borough's published apportionment figure. As we were advised, the apportionment figure has already allowed for exports of waste.

**Recommendation 8.8**

We recommend that it is made clear within the footnote to the FALP apportionment Table 4A.4 that the managing of waste can be undertaken on an individual Borough basis or by groupings within London.



## Appendix A EiP Schedule of Matters and Participants

### Timetable, Final List of Matters and Participants (as published in May 2007)

#### *Introduction*

The matters are limited to consideration of significant issues arising from the Draft Further Alterations, including the Draft Borough Level Waste Apportionment that was subject to a separate consultation. The London Plan 2004 and its Early Alterations have been previously examined and are not now subject to review. The Panel will examine the Further Alterations having regard to the provisions of GOL Circular 1/2000, the general duties and powers of the Mayor and requirements in the GLA Act with respect to the Plan: that it deals only with matters that are of strategic importance to London and takes account of the health of Londoners, equality of opportunity and contributing to sustainable development in the UK.

The matters and sub matters set out in this list are designed to enable thorough testing of key elements of the Draft Further Alterations to the London Plan (FALP) through their Examination in Public. This testing under all matters will take account of equality, diversity and equal opportunities aims, as well as other over-arching issues such as respect for human rights and importance of sustainable development.

In preparing their statements, participants should have regard to the 'Guidance Notes for Participants'. Participants submitting statements with respect to more than one Matter must submit separate statements for each Matter that they wish to address. Participants should take care to focus their statements very specifically on the questions that the Panel have set out for each Matter, and not to stray into other aspects, especially those where the Draft Further Alterations do not significantly change the London Plan 2004 or the Early Alterations.

However, so far as they can, participants should deal with any points material to the Panel questions which arise from the Sustainability Appraisal, from relevant recent Government planning policy or guidance, or from proposed Alterations to Chapter 6 (Implementing the London Plan).

Responses to the Further Alterations included numerous suggestions for minor changes or clarifications that do not go to the substance of the Further Alterations. The GLA are preparing a schedule of minor corrections, clarifications and updates in response. The Panel expects to endorse these in due course, without public examination, provided that it is satisfied that the changes are limited to matters that enhance the presentation and clarity of the Further Alterations without affecting the substance. The schedule and the Panel's comments on it will be published on the website prior to the Examination in Public.

## Summary Programme

<b>EiP Dates 2007</b>	<b>Examination in Public Sessions</b>
Duration	From Monday 18 June 2007 to Tuesday 10 July 2007 (no sessions on Wednesdays)
<b>EiP Week 1 (Monday 18 June 2007)</b>	
<b>Day 1</b>	<i>Monday 18 June 2007</i>
	<b>1.1 Climate Change – Mitigation (may run into day 2)</b>
<b>Day 2</b>	<i>Tuesday 19 June 2007</i>
	<b>1.2 Climate Change - Adaptation and related issues (commencing on completion of 1.1)</b>
<b>Day 3</b>	<i>Thursday 21 June 2007</i>
	<b>1.2 Climate Change - Adaptation and related issues</b>
	<b>2 Blue Ribbon Network</b>
<b>EiP Week 2 (Monday 25 June 2007)</b>	
<b>Day 4</b>	<i>Monday 25 June 2007</i>
	<b>3 Consistency with Adjacent Regional Spatial Strategies</b>
<b>Day 5</b>	<i>Tuesday 26 June 2007</i>
	<b>4 Sub Regional Structure</b>
<b>Day 6</b>	<i>Thursday 28 June 2007</i>
	<b>5.1 Town Centres/Central Activities Zone</b>
	<b>5.2 Opportunity Areas/Areas for Intensification/Areas for Regeneration</b>

<b>Day 7</b>	<i>Friday 29 June 2007</i>
	<b>5.3 Industrial Locations</b>

<b>EiP Week 3 (Monday 2 July 2007)</b>	
--	--

<b>Day 8</b>	<i>Monday 2 July 2007</i>
	<b>5.4 The Suburbs: supporting sustainable communities</b>

<b>Day 9</b>	<i>Tuesday 3 July 2007</i>
	<b>6 Housing</b>

<b>Day 10</b>	<i>Thursday 5 July 2007</i>
	<b>7 Transport</b>

<b>EiP Week 4 (Monday 9 July 2007)</b>	
--	--

<b>Day 11</b>	<i>Tuesday 10 July 2007</i>
09.30am	<b>8 Waste Management</b>

Timetable		Final List of Matters		Final list of Participants
Weeks	Start Time	Number	Matters <i>Relevant parts of Explanatory Text and Policies</i>	Participants
<b>EiP Week 1</b>				
<b>Monday 18 June 2007 Day 1</b>		<b>Matter 1</b>	<b>Climate Change Mitigation, Adaptation and Related Issues</b>	
<b>Start time:</b>	<b>10.00</b>	<b>1.1</b>	<b>Climate Change - Mitigation</b>	
			<b>2000 word limit for statements on 1.1/1 to 1.1/5</b>	
		<b>1.1/1</b>	Do the Further Alterations offer a robust way forward for London to mitigate climate change?	Mayor of London Government Office for London Bellway Homes British Property Federation Combined Heat and Power Association EDF Energy Network Ltd Environment Agency Friends of the Earth London Fulcrum Consulting Home Builders Federation London 21 London Assembly London Climate Change Agency London Councils (x 2 seats) London First London Forum of Amenity & Civic Societies London Sustainability Exchange RSPB
		<b>1.1/2</b>	Are the targets for reducing CO <sub>2</sub> emissions robust and consistent with national policy?	
		<b>1.1/3</b>	Is the change to Objective 5, 5 <sup>th</sup> bullet justified? (From 'Minimise the need to travel and growth of journey lengths' to 'Reduce the need to travel by car and the growth of journey lengths')	
		<b>1.1/4</b>	Is the target for on site renewable energy generation practicable and is any variation from national policy justified?	

		<b>1.1/5</b>	Are the Further Alterations robust with regard to the technologies promoted to counter climate change, including CCHP and the use of hydrogen as a fuel?	Thames Water Property Services Town & Country Planning Association Transport 2000 Westminster Property Owners Association
<b>Tuesday 19 June 2007 Day 2</b>		<b>Matter 1</b>	<b>Climate Change Mitigation, Adaptation and Related Issues</b>	
			<b>2000 word limit for statements on 1.2/1 to 1.2/3</b>	
<b>Start time:</b>	<b>10.00</b>	<b>1.2</b>	<b>Climate Change – Adaptation and Related Issues</b> ( <i>This session will commence on completion of consideration of Matter 1.1</i> )	
		<b>1.2/1</b>	Do the Further Alterations offer a robust way forward for London to adapt to the effects of climate change?	Mayor of London Government Office for London Bellway Homes
		<b>1.2/2</b>	Are the Further Alterations on flood protection consistent with national policy?	British Property Federation Combined Heat and Power Association

		<b>1.2/3</b>	<p>Are the Further Alterations effective on matters of water supply, sewerage infrastructure and air quality?</p>	<p>EDF Energy Network Ltd  Environment Agency  Friends of the Earth London  Fulcrum Consulting  Home Builders Federation  London 21  London Assembly  London Climate Change Partnership  London Councils (x 2 seats)  London First  London Forum of Amenity &amp; Civic Societies  London Sustainability Exchange  RSPB  Thames Water Property Services  Town &amp; Country Planning Assoc  Transport 2000  Westminster Property Owners Association</p>
--	--	--------------	---	---

<b>Thursday 21 June 2007 Day 3 PM</b>		<b>Matter 2</b>	<b>Blue Ribbon Network</b>	
			<i>Participants need to take account of detailed changes to the Further Alterations proposed as part of the schedule of corrections, clarifications and updates referred to in the Introduction above. To be published w/c 30<sup>th</sup> April</i>	
			<b>1500 word limit for statements</b>	
<b>Start time:</b>	<b>14.00</b>			
		<b>2.1</b>	Do the textual changes in the Further Alterations unacceptably weaken the approach to the Blue Ribbon Network?	Mayor of London Government Office for London British Waterways London Councils (x 2 seats) London Forum of Amenity & Civic Societies London Waterways Commission Regents Network River Thames Society Thamesbank The Creekside Forum West London River Group

<b>EiP Week 2</b>				
<b>Monday 25 June 2007 Day 4</b>		<b>Matter 3</b>	<b>Consistency with adjacent Regional Spatial Strategies</b>	
			<b>2000 word limit for statements</b>	
<b>Start time:</b>	<b>10.00</b>			
		<b>3.1</b>	Are the Further Alterations consistent with the East of England and South East Regional Spatial Strategies, in particular with regard to the identification of a London, Luton and Bedford growth corridor?	<p>Mayor of London  Government Office for London  Association of London Borough Planning Officers  Bedfordshire County Council  Business in the Community  Campaign to Protect Rural England  East of England Regional Assembly  Hertfordshire County Council  Highways Agency  London Councils (x 2 seats)  London First  North London Strategic Alliance  South East England Regional Assembly  South London Partnership  Surrey County Council  Town &amp; Country Planning Association  Thames Gateway London Partnership  Watford Borough Council  West London Partnership</p>



<b>Tuesday 26 June 2007 Day 5</b>		<b>Matter 4</b>	<b>Sub Regional Structure</b>	
			<b>2000 word limit for statements</b>	
<b>Start time:</b>	<b>10.00</b>			
		<b>4.1</b>	Does the intended sub regional structure better support the underlying aims and implementation of the Plan?	Mayor of London Government Office for London Association Of London Borough Planning Officers Central London Partnership Gateway to London London Councils (x 2 seats) London First London Forum of Amenity & Civic Societies North London Strategic Alliance South London Partnership Thames Gateway London Partnership West London Alliance West London Partnership

<b>Thursday 28 June 2007 Day 6</b>		<b>Matter 5</b>	<b>Designated Locations</b> <i>These matters to be examined by topic rather than sub region.</i>	
			<b>2000 word limit for statements on 5.1 or 5.2 combined. Participants in only one of these matters - statements should not exceed 1500 words.</b>	
<b>Start time:</b>	<b>10.00</b>	<b>5.1</b>	<b>Town Centres/CAZ</b>	
		<b>5.1/1</b>	Do the Further Alterations strike the right emphasis between the CAZ and the town centres?	Mayor of London Government Office for London Association Of London Borough Planning Officers Ballymore Properties & Hammerson UK Properties Canary Wharf Group plc Central London Partnership City Property Association Covent Garden Community Association English Heritage Friends of the Earth London Highways Agency London Assembly London Civic Forum London Councils (x 2 seats) London Development Agency London First London Forum of Amenity & Civic Societies London Tenants Federation North London Strategic Alliance South London Partnership West London Partnership Westminster Property Owners Association
		<b>5.1/2</b>	Is the extent of the CAZ the optimum one; should it take in Canary Wharf and part of the Isle of Dogs?	
		<b>5.1/3</b>	Do the Further Alterations provide adequate guidance for Boroughs in the preparation of LDDs?	
		<b>5.1/4</b>	Are the Further Alterations consistent with PPS6 or otherwise justified by the London context?	
		<b>5.1/5</b>	Are the changes in individual Town Centre designations robust with particular regard to Uxbridge and Canary Wharf?	
		<b>5.1/6</b>	Does the proposed hierarchy allow for sufficient local flexibility to reflect future town centre changes and local circumstances and priorities?	

Thursday 28 June 2007 Day 6 contd		Matter 5	Designated Locations	
			<b>2000 word limit for statements on 5.1 or 5.2 combined. Participants in only one of these matters - statements should not exceed 1500 words.</b>	
		<b>5.2</b>	<b>Opportunity Areas/Areas for Intensification/Areas for Regeneration</b>	
		<b>5.2/1</b>	Are the changes to individual OA/AI/AfR designations robust? Is there the right emphasis between central and outer London?	Mayor of London Government Office for London Association Of London Borough Planning Officers Central London Partnership Covent Garden Community Association Covent Garden Market Authority English Heritage Friends of the Earth London Highways Agency London Assembly London Civic Forum London Councils (x 2 seats) London Development Agency London First London Forum of Amenity & Civic Societies London Tenants Federation London Thames Gateway Development Corporation North London Strategic Alliance Sainsburys Supermarkets Ltd Tesco Stores Ltd West London Partnership
		<b>5.2/2</b>	Do the Further Alterations strike the right balance between quality in new development and safeguarding existing special character and distinctiveness?	
		<b>5.2/3</b>	Do the Further Alterations maximise legacy opportunities raised by the Olympic/Paralympic Games in 2012?	

<b>Friday 29 June 2007 Day 7</b>		<b>Matter 5</b>	<b>Designated Locations</b>	
			<b>1500 word limit for statements on 5.3/1 to 5.3/3</b>	
<b>Start time:</b>	<b>9.30</b>	<b>5.3</b>	<b>Industrial Locations</b>	
		<b>5.3/1</b>	Are the individual changes to Strategic Industrial Locations robust?	Mayor of London Government Office for London Association Of London Borough Planning Officers Brixton plc English Heritage Highways Agency London Assembly London Civic Forum London Councils (x 2 seats) London Development Agency London First London Forum of Amenity & Civic Societies London Tenants Federation Neptune Wharf Ltd Thames Gateway London Partnerships
		<b>5.3/2</b>	What evidence is there for the release of, specifically, 39 ha of industrial land annually? Has this been coordinated with the needs for waste management?	
		<b>5.3/3</b>	Do the Further Alterations adequately address the possibility of rationalising industrial land for mixed-use redevelopment rather than total release to other priority uses?	

EiP Week 3				
Monday 2 July 2007 Day 8		Matter 5	Designated Locations	
			<b>2000 word limit for statements on 5.4/1 to 5.4/4</b>	
<b>Start time:</b>	<b>10.00</b>	<b>5.4</b>	<b>The Suburbs</b>	
		<b>5.4/1</b>	Do the Further Alterations provide a robust approach to safeguarding and increasing accessible employment for Londoners living in the suburbs? Is the right balance struck between residential related employment and other forms of accessible employment?	Mayor of London Government Office for London Association Of London Borough Planning Officers Brixton plc Consortium Registered Social Landlords English Heritage Friends of the Earth Groundwork London Highways Agency Housing Corporation London Assembly London Civic Forum London Councils (x 2 seats) London Development Agency London First London Forum of Amenity & Civic Societies London Tenants Federation London Thames Gateway Forum North London Strategic Alliance
		<b>5.4/2</b>	Are the Further Alterations robust in aims to safeguard and improve social and transport services for the suburbs?	
		<b>5.4/3</b>	Do the Further Alterations strike the right balance between facilitating change and environmental quality in the suburbs?	
		<b>5.4/4</b>	Is the definition of London's suburbs sufficiently clear? Does it adequately recognise the difference between inner and outer suburban areas in London?	

<b>Tuesday 3 July 2007 Day 9</b>		<b>Matter 6</b>	<b>Housing</b>	
			<b>2000 word limit for statements on 6/1 to 6/4</b>	
<b>Start time:</b>	<b>10.00</b>			
		<b>6/1</b>	Does the density maxtrix strike the right balance between guidance and flexibility? Will it deliver the required housing while safeguarding local character?	Mayor of London Government Office for London Association Of London Borough Planning Officers Bellway Homes Consortium Registered Social Landlords
		<b>6/2</b>	Does density and design strike the right balance between sustainability and need?	Home Builders Federation Housing Corporation London Assembly
		<b>6/3</b>	Are the Further Alterations on affordable housing consistent with national policy; is the threshold of 10 dwellings for affordable provision an optimum number?	London Civic Forum London Councils (x 2 seats) London First London Forum of Amenity & Civic Societies London Tenants Federation
		<b>6/4</b>	Are the Further Alterations consistent with PPS3, particularly having regard to growth and housing provision post 2016?	Neptune Wharf Ltd Planning Aid for London Town & Country Planning Association

<b>Thursday 5 July 2007 Day 10</b>		<b>Matter 7</b>	<b>Transport</b>	
			<b>2000 word limit for statements on 7/1 to 7/2</b>	
<b>Start time:</b>	<b>10.00</b>	<b>7.1</b>	<b>Aviation</b>	
		<b>7/1</b>	Are the Further Alterations consistent with the Aviation White Paper and December 2006 Progress Statement?	Mayor of London Government Office for London Aviation Environment Forum BAA British Waterways
<b>Start time:</b>	<b>14.00</b>	<b>7.2</b>	<b>Freight</b>	Campaign for the Protection of Rural England
		<b>7/2</b>	Are the freight strategy/intermodal facilities policies robust and consistent with other aims of the Plan including protection of the Green Belt?	East of England Regional Assembly Environment Agency Essex County Council Freight on Rail Friends of the Earth London Helioslough Ltd Hertfordshire County Council Highways Agency London Councils (x 2 seats) London First London Forum of Amenity & Civic Societies Port of London Authority South East of England Regional Assembly Transport 2000 Transport for London

<b>EiP Week 4</b>				
<b>Tuesday 10 July 2007 Day 11</b>		<b>Matter 8</b>	<b>Waste Management</b>	
			<b>2000 word limit for statements on 8.1 and 8.2</b>	
<b>Start time:</b>	<b>09.30</b>			
		<b>8.1</b>	Is the Further Alteration Borough apportionment for waste management a robust assessment?	Mayor of London Government Office for London Association Of London Borough Planning Officers Biffa
		<b>8.2</b>	Should there be any variation in recycling targets contained in the Early Alterations?	Cory Environmental Ltd East London Waste Authorities Environment Agency Friends of the Earth London Borough of Bexley London Borough of Greenwich London Councils (1 seat) North London Waste Planning Group Riverside Waste Partnership South West London Boroughs Joint Waste Group West London Waste Authority
<b>Tuesday 10 July 2007</b>			<b>Close of Examination</b>	



**Appendix B Minor Corrections, Clarifications and Updates****Based on BN72**

Section	Policy	Published in	Action	Panel Response
Intro/Preambl	Preamble	List of Minor Corrections, et al	In Objective 2 the reference to 'housing mix policies' will be amended to 'overall housing mix'	Endorse
	I.1	BN66	Amend the wording in the fourth bullet point, Objective 1 as follows: · 'Make the Thames Gateway parts of North East and South East London the priority area for new development, regeneration and investment, including the prime location for the 2012 Olympic and Paralympic Games, introducing a new scale and quality of development (see also Chapter 5, Parts C and D).'	Endorse
Chapter 1	New Policy	BN54	Amendments to Paras 1.15 and 1.19 include reference to 'logistics'.	Endorse
	New Policy 1.3	BN25	Alter policy title from: "New Policy 1.3 Growth Areas" to: "New Policy 1.3 Growth Areas and Development Corridors" Paragraph 1.23, last bullet point (on London, Luton, Bedford regeneration corridor of city regional importance, page 9): delete: "which need strategic coordination" replace with: "The regional and local authorities will jointly examine timescales and mechanisms for the strategic co-ordination of these areas."	Partly endorse - see Recommendation 3.2
	Para 1.58	List of Minor Corrections, et al	The wording "the Association of London Government" will be replaced with "London Councils".	Endorse
Chapter 2	2A.1	List of Minor Corrections, et al	8th bullet replace 'green networks' with 'green infrastructure.'	Endorse
	2A.1i	List of Minor Corrections, et al	3rd bullet of policy will be amended to read: "...North East and South East London..."	Endorse
	2A.1iii	List of Minor Corrections, et al	Text will indicate that the final boundary for CAZ should be for borough definition in LDFs. Proposal for CAZ framework will be expanded to include process, status and timescale as appropriate. Text will be amended to read 'the CAZ framework will be prepared to inform the relevant DPDs'.	Endorse - see also Chapter 4
	2A.4	BN66	Para 2.11, second to last sentence a reference to the LDA will be added. Para 2.12 the following will be added to the end of the Para: '...(see also Chapter 3B and the Mayor's Economic Development Strategy).'	Endorse as referring to 3rd to last sentence Endorse
	Para 2.18i	BN22	As referred to in the Mayor's statement on Matter 5.4/4 the Mayor proposes to amend paragraph 2.18i and references/footnotes	Endorse - see Recommendation 5.12
	Para 2.25	BN22	As referred to in the Mayor's statement on Matter 5.3/2 (paragraph 10) the Mayor proposes to amend paragraph 2.25.	Endorse - see Recommendation 5.15
Chapter 3A	3A.2i	List of Minor Corrections, et al	The wording 'and commercial' will be deleted from policy text Para 3.15v, 2nd bullet insert into urban definition 'and mansion blocks' Para 3.15vi insert 'existing or planned' in reference to areas where good public transport is planned	Endorse - see paragraphs 6.43 - 6.45 Endorse Endorse
	3A.2i	BN67	Delete at end of policy '(see section 6 of the Mayor's housing SPG)'. Para 3.15v, 1st bullet, amend text as follows: Central – areas with very dense development, a mix of different uses, large building footprints and typically buildings of four to six stories, located within 800 metres walking distance of a metropolitan or major town centre. Para 3.15v, 2nd bullet, delete ' 10 minutes walking distance' and insert ' 800 metres walking distance.'	Endorse - see Recommendation 6.2
	3A.3	List of Minor Corrections, et al	Para 3.16add 'long term vacant properties (empty for more than 6 months)' 'there is a need to invest in maintaining and refurbishing housing stock so it does not become vacant' will be reinstated	Endorse
	3A.5	List of Minor Corrections, et al	Para 3.23 add 'and social care' to end of para. The threshold will be revised to '...5 hectares or more, or that are capable of accommodating more than 500 dwellings'.	Endorse
	3A.6	List of Minor Corrections, et al	Para 3.33 insert 'comprising 20,800 social housing units and 2,500 intermediate units'	Endorse
	3A.6	BN67	Para 3.26, add the following text: Intermediate Housing – Sub-market housing which is above target rents. But is substantially below open market levels and is affordable by households on incomes of between £16,900 pa and £52,500 pa, with a monitoring midpoint of £35,600 pa (as at February 2007 to be reviewed annually to reflect changes in lower quartile house prices).	Endorse - see Recommendation 6.3
	3A.8i	List of Minor Corrections, et al	After Policy 3A.2i insert '...and Table 3A.2'	Endorse
	3A.10	List of Minor Corrections, et al	Para 3.54i will be amended to list 'extra care homes, residential care homes, nursing care homes, or other appropriate specialist housing for older persons'	Endorse
	3A.14	List of Minor Corrections, et al	2nd sentence will be amended to include 'including healthcare and social care'. A reference to 'Access to employment/skills development opportunities' will also be made. References to playspace and open space (Policy 3D.10 and 3D.11 respectively) will be added. A reference will be made to 'policing facilities' Para 3.62i - will include reference to 'environments that encourage walking and cycling' Para 3.65 - will include reference to: 'increasing diversity of older people and living alone'. Para 3.67ii - will include reference to 'The provision of affordable youth, sports and leisure facilities has been shown statistically to be effective in reducing antisocial behaviour'.	Endorse - but see paragraph 5.4. Enlarge to include reference to "policing facilities" in other Policies referred to below (not just Policy 3A.14)  Endorse Endorse Endorse
	3A.15	List of Minor Corrections, et al	The 1st sentence will have a reference to 'cycling' and a para will be added about 'convenience shops, banking facilities and post offices' (including a cross-reference to 3D)	Endorse with an additional reference to "policing facilities"
	3A.17	List of Minor Corrections, et al	Policy will be amended to include 'DPDs should include policies for the improvements of health of local population and reduction of health inequalities as set out in objectives...'	Endorse
3A.19	List of Minor Corrections, et al	The following will be deleted from the policy 'by protecting facilities that exist and'	Endorse	

Section	Policy	Published in	Action	Panel Response
	3A.20	List of Minor Corrections, et al	Para 3.87 - will be amended to read 'a high quality environment that encourages active travel'  Para 3.87 - will include a reference to the Health Issues BPG and the information it contains on Health Impact Assessment	Endorse with addition of "such as walking and cycling" after "active travel" Endorse
	3A.23	List of Minor Corrections, et al	The 8th bullet point will be split into two	Endorse with an additional reference to "policing facilities"
<b>Chapter 3B</b>	3B.1	List of Minor Corrections, et al	Para 3.118 - footnote (viii) will be moved to after '2026' to make clear how 6.6-8.9m has been arrived at	Endorse
	3B.2	List of Minor Corrections, et al	A cross reference will be added to the second half of policy, 3rd bullet, to strategically specified locations identified in Para 3.123 The 6th bullet will be amended to reflect additional office growth areas	Endorse - see also Recommendation 5.10  Not endorsed - how would this assist?
	3B.4	List of Minor Corrections, et al	Para 3.123 a cross reference will be added to the <u>strategically specified locations</u>	Endorsed - see also Recommendation 5.10
	3B.5	List of Minor Corrections, et al	A cross reference to Policy 2A.7 will be added	Endorse
	3B.5	BN22	As referred to in the Mayor's statement on Matter 5.3/3 (paragraph 11) the Mayor proposes to amend Policy 3B.5 by adding the following bullet point: <u>the potential for surplus industrial land (as defined in assessments) to help meet strategic and local requirements for a mix of other uses such as housing and social infrastructure and where appropriate, contribute to town centre renewal.</u>	Endorse - see Recommendation 5.15
	3B.10	List of Minor Corrections, et al	The 2nd bullet point will be amended to state "...in town centres and other locations <u>across London</u> with good public transport access"	Endorse
	3B.12	List of Minor Corrections, et al	Amend to read 'Increase the productivity of London's businesses by tailoring supply side skills to employer led demand through the Mayor's London and Employment and skills board and sub-regional development implementation plans.' 3.151 - update to include 'London Skills and Employment Board' 3.151 - Additional comments relating to skill system, including reference to availability/requirement mismatches, funding disparities between FE colleges and private training, and the Leitch Review of Skills Para 3.156 will be amended to read "...and other barriers such as inter-generational underachievement, which prevent..."	Endorse - see also paragraphs 5.107, 5.136, 5.137 & 5.185
	Para 3.129iii	BN22 (also referred to in BN28)	As referred to in the Mayor's statement on Matter 5.3/2 (paragraph 9) Paragraph 3.129iii will be amended to refer to the results of feasibility studies on developing a sustainable food hub.	Endorse - see Recommendation 5.13
<b>Chapter 3C</b>	3C.2	List of Minor Corrections, et al	1st sentence of 2nd para replace 'Borough should take a strategic lead in exploring opportunities for development in areas where there is appropriate transport...' replace with 'Boroughs should take a strategic lead in <u>exploiting</u> opportunities for development in areas where appropriate transport accessibility and capacity <u>exists or is being introduced.</u> '	Endorse
	3C.4	List of Minor Corrections, et al	Para 3.166 - 5th bullet - replace 'national rail' with ' <u>rail</u> '	Endorse
	3C.5	List of Minor Corrections, et al	Para 3.169 1st bullet point include reference to Airtrack after 'to Heathrow airport' add ' <u>, such as Airtrack.</u> '	Endorse - see also paragraph 7.44
	3C.6	BN62	Amend paragraph 3.174 (additions underlined): "Policy 3C.6, <u>which applies to all airports in London</u> , will be reviewed in the light of the outcomes of current government studies on airport development, including the Project for the Sustainable Development of Heathrow (PSDH) upon which consultation is expected to take place later in 2007." Delete the following sentence from paragraph 3.175: "The proposed expansion at Stansted (and potentially later at Gatwick) is therefore supported, provided that the environmental effects are satisfactorily mitigated and that sufficient additional transport capacity, particularly by public transport is provided."	Endorse - see Recommendation 7.2  Endorse - see Recommendation 7.3
	3C.9	List of Minor Corrections, et al	Para 3.181i - in 3rd sentence clarify: 'the proposed transport schemes described in tables 3C.1 and 6A.2 will increase public transport capacity up to 50% compared to 2001' with 'the proposed transport schemes described in tables 3C.1 and 6A.2 will increase public transport capacity up to 50% <u>in year 2022</u> compared to 2001'	Endorse - see also paragraph 5.21 et seq
	3C.11	BN66	Para 3.186 the following text will be added to the end of the Para: ' <u>Under proposed legislation the south east London part of the line goes to Abbey Wood. The Mayor also supports the safeguarding of the route further east to Ebbsfleet</u> ' along with the following footnote: ' <u>Crossrail. Crossrail Safeguarding Direction Abbey Wood to Hoo Junction. Department of Transport, 2005</u> '	Endorse - though the Panel suggest "of the route within London further east towards Ebbsfleet" ie limiting the reference to the line within the London boundary
	3C.12	List of Minor Corrections, et al	Para 3.191 - After 1st sentence '...moving high volumes of people.' add new sentence ' <u>The line upgrades will be supported by other investments, in particular station capacity works, to enable full benefit of train service capacity increases. The upgrades will improve journey times and provide additional capacity enhancements across the network.</u> '. In 1st bullet Jubilee Line - replace 'an increase of about 48 per cent...' with 'an increase of about <u>45</u> per cent'	Endorse
	3C.12	List of Minor Corrections, et al	Para 3.192 amend 2nd sentence replace 'TfL is progressing this further following four major DLR projects in east London...' with ' <u>TfL is progressing four further major DLR projects in East London.</u> ' In 2nd Bullet replace 'Powers will be sought for phase 2...' with ' <u>Powers were sought in 2006 for phase 2,...</u> '	Endorse
	3C.13	List of Minor Corrections, et al	Amend 1st bullet after 'transit schemes successful' add ' <u>and acknowledge their associated regeneration benefits and urban realm improvement opportunities</u> '	Endorse
	3C.18	List of Minor Corrections, et al	Para 3.199, 2nd sentence include reference to trams replace 'travelling by foot, cycle, bus or car...' with 'travelling by foot, cycle, bus, <u>tram</u> or car...' At end of para replace 'and Streetscape Guidance' with ' <u>and draft Streetscape Guidance.</u> ' Para 3.201, 1st sentence replace 'The central London congestion charging scheme and its planned western extension...' with ' <u>The central London congestion charging scheme and its western extension...</u> '	Endorse
	3C.20	List of Minor Corrections, et al	In first bullet point replace '...and using the TFL guidance Improving Walkability' with ' <u>...and based on the TfL guidance...</u> '	Endorse
	3C.24	BN62	Para 3.215, last sentence include word ' <u>rail</u> ' in two places to ensure clarity that the Plan is discussing rail issues.	Endorse - see Recommendation 7.8
	3C.25	List of Minor Corrections, et al	Replace 'strategic rail intermodal freight' with ' <u>Strategic Rail Freight Interchange</u> '	Endorse - see Recommendation 7.9

Section	Policy	Published in	Action	Panel Response
	3C.25	BN62	Delete all but the first sentence of paragraph 3.218, and replace the deleted sentences with a new sentence, as follows (addition underlined): "The former Strategic Rail Authority (SRA) identified a requirement for three or four large multi-modal freight facilities on or close to the periphery of London. <u>Additional guidance on the characteristics and requirements of strategic freight interchanges is set out in the Land for Transport SPG</u> ".	Partly endorsed - see Recommendation 7.10
<b>Chapter 3D</b>	3D.1	List of Minor Corrections, et al	Add sentence to end of paragraph 3.223ii to read: "Strategic and local assessments of need and capacity, informed by each other, will be part of the process for DPD preparation."	Endorse
	3D.4	List of Minor Corrections, et al	Change reference in Para 3.233 to read: "...the Barbican, the South Bank/Bankside, West End/Soho/Covent Garden...".	Endorse
	3D.6	List of Minor Corrections, et al	Clarify gross/net additional hotel bedroom requirement: Change Policy text 3D.6 to read: "...and to achieve <u>40,000 net</u> additional hotel bedrooms by 2026...". Change Para 3.240 to clarify "To accommodate potential growth a further <u>40,000 net</u> additional hotel bedrooms should be provided in the period up to 2026, in a range of suitable locations throughout London. <u>With the loss of some small scale low quality hotels, this is estimated to total an additional 50,000 gross total bedrooms. Loss of strategically important hotel capacity in appropriate locations should be resisted.</u> Addition to 4th bullet point of Policy 3D.6: "support the provision of a wide range of tourist accommodation, such as aparthotels... and <del>caravan sites, and resist the loss of strategically important hotel capacity.</del> "	Endorse
	3D.7	List of Minor Corrections, et al	Amend the title to read " <u>Realising the value of open space and green infrastructure</u> " 2nd para to replace 'green network' with 'green infrastructure.' Final sentence of policy add "... <u>a positive contribution to and is integrated with the wider network.</u> " Para 3.246 delete 'major' from the first sentence.	Endorse
	3D.8	List of Minor Corrections, et al	Amend 3D.8 to read "... <u>to improve environmental and landscape quality</u> " Amend the last sentence to refer to improving " <u>landscape quality</u> "	Endorse Duplicates element of previous change
	3D.12	List of Minor Corrections, et al	Para 3.255, 2nd sentence replace 'English Nature' with 'Natural England' A map will be added showing the broad areas described in Table 3D.2	Endorse
	3D.12	BN16d	In reference to the RSPB's written statement, the following sentence will be added to the end of Para 3.256 under Policy 3D.12 Biodiversity and nature conservation: <u>Priority should be given to connecting fragmented habitat and increasing the size of habitat areas with a view to increasing species' resilience to climate change.</u>	Endorse - see Recommendation 1.15
	3D.13	List of Minor Corrections, et al	Add a reference to Green Arc to sub-regions: (North 5B.1, South West 5E.1, West 5F.1) " <u>develop and support the Green Arc concept to improve the landscape quality and access to the open countryside in the urban fringe, working across local and regional boundaries</u> ".	Endorse but with reservations regarding desirability to avoid duplication between generic and sub regional policies
	3D.14	List of Minor Corrections, et al	Amend the 2nd sentence of para 3.263 to read: "...wildlife habitat, <u>natural resources</u> , ... improving air, soil and water quality..."	Endorse
	3D.15	List of Minor Corrections, et al	Amend the 3rd sentence of para 3.265 to read as follows: " <u>The 9th London Local Authorities Bill would enable Boroughs to re-use burial grounds in accordance with the scheme and provisions set out in the Bill.</u> "	Endorse
	Para 3.243	BN22	As referred to in the Mayor's statement on Matter 5.1/2 (paragraph 4), Paragraph 3.234 will be amended to reflect the latest position on the ICC.	Endorse - see Recommendations 5.5, 5.6 & 5.7
	Para 3.243i	BN66	A reference to ' <u>The Economic Development Strategy</u> ' will be added at the beginning of the para.	Endorse
<b>Chapter 4A</b>	4A.1	List of Minor Corrections, et al	Combine bullets 4 and 6 to read: " <u>Minimise the amount of energy used, and transport impacts from, the collection, treatment and disposal of waste in line with the Mayor's targets of reducing carbon emissions</u> ". Replace 'management of waste' with ' <u>treatment and disposal of waste</u> ' Revise penultimate para, replace 'especially where it enable the generation of hydrogen' with ' <u>especially where the products of waste treatment could be used as fuels e.g. Biofuels and hydrogen</u> '	Endorse
	4A.1	BN71	At the end of the 1st supporting paragraph, after policy bullet points, inset the following the text: <u>'The recycling and composting target for commercial and industrial waste arises from consultation on the modeling figure used for the Early Alterations to the London Plan (December 2006). The target is challenging but achievable, and reflects the current relatively high level of commercial and industrial recycling, which in 2003 was estimated to be 44 per cent.'</u>	Endorse
	4A.2	List of Minor Corrections, et al (also referred to BN71)	Amend first paragraph to read "In support of the Mayor's Municipal Waste Management Strategy, the aim of driving waste management up the waste hierarchy, the objectives of communities taking more responsibility for their own waste and <u>disposing of waste in one of the nearest appropriate installations</u> and the need to plan for all waste streams, the Mayor will, <u>where appropriate</u> , and DPD policies should:" Amend third bullet to read " <u>Identify new sites in suitable locations for new recycling and waste treatment facilities, such as MRFs, waste reuse and recycling centres (Civic Amenity sites), construction and demolition waste recycling plants and closed vessel composting</u> "	Endorse
	4A.2i	List of Minor Corrections, et al	4th bullet point: 'manage overheating' will be replaced with ' <u>avoid internal overheating and excessive heat generation</u> ' 9th bullet point ' <u>using local suppliers wherever possible</u> ' will be added 12th bullet point: after 'through' 'SUDS' will be added, and at end of the bullet 'for infrastructure and property' will be added	Endorse
	4A.2i	BN10	Addition of text to the supporting text of Policy 4A.2i: <u>In the light of the Government's Code for Sustainable Homes (December 2006), the relevant standards in the SPG will be reviewed at the earliest opportunity. The Mayor's Strategic Housing Investment Plan will set out the timetable for moving from Code level 3 to higher levels in the Code for publicly funded residential developments.</u>	Endorse - see Recommendation 1.1

Section	Policy	Published in	Action	Panel Response
	4A.2i	BN16d	The following wording will be added to the end of Paragraph 4.4ii: <u>The standards in the SPG on sustainable design and construction will be revised at the earliest opportunity to reflect both the FALP and to clarify any the issues in relation to the Code for Sustainable Homes. The Code and the SPG complement each other but affect development at different stages in the development process. There is a small overlap on specific issues between the documents but there are also considerable issues where only one of the documents provides advice. It is clear that the policies in the London Plan guide development at the beginning of the development process (particularly at the early design stages) and that the provisions of the Code are applied later on.</u>	Not endorsed - see paragraph 1.22
	4A.2ii	List of Minor Corrections, et al	A reference will be added to the recently published 'Climate Change Action Plan' Para 4.13ii the following new sentence will be added: 'the Mayor will work with partnerships by committing to work with London Energy Partnership, London Climate Change Agency, London Hydrogen Partnership and Local Authorities'	Endorse - see paragraph 1.39
	4A.3	BN71	Amend paragraph 4.8 as follows: "...The proximity principle requires that waste be treated in <u>one of the</u> nearest appropriate installations."	Endorse
	4A.5i	List of Minor Corrections, et al	4th bullet point ' <u>communal heating and cooling fuelled by renewable sources of energy</u> ' will be added	Endorse
	4A.5i	BN10	Para 4.23ii add sentence: <u>CCHP and CHP will need to be sized to minimise carbon emissions.</u>	Endorse - see Recommendation 1.12
	4A.5i	BN16	Para 23ii, end of 4th sentence in, a cross reference will be added to the <u>Mayor's Air Quality strategy.</u>	No comment - see paragraph 1.85
	4A.5ii	List of Minor Corrections, et al	Para 4.23iii will be amended in reference to water by saying 'generate water as a by product'	Endorse
	4A.5iii	BN10	Additional bullet point: · - <u>minimising water use (Policy 4A.11)</u>	Endorse - see Recommendation 1.14
	4A.5iii	BN16d	An additional bullet point will be added to Policy 4A.5iii: · <u>Green infrastructure</u>	Partly endorse - see Recommendation 1.14
	4A.5iv	List of Minor Corrections, et al	Para 4.30ii the following text will be added 'Expanding green networks to create 'breathing spaces' A reference to the 'role of building materials in reducing heat absorption' will be added A reference to the London Climate Change Partnership will be added along with their 'adapting to climate change: a checklist for development'	Endorse
	4A.5v, 4A.5vi, 4.30iii, 4.30iv, 4.88	List of Minor Corrections, et al	We will re write 4A.5v, 4A.5vi, 4.30iii, 4.30iv, 4.88 to be compliant with recently published PPS25 and acknowledge the role of the Regional Flood Risk Assessment, currently in preparation.	Endorse in principle - see paragraph 1.121 and Recommendations 1.17 to 1.20
	4A.5vi	BN16d	Add text after bullet points: <u>Opportunities should also be taken to identify and create new floodplain and restore all, or part of, natural floodplains to fulfil a flood risk management function.</u> Add text to supporting paras: 4.30iii: <u>Boroughs, either individually or collectively, will produce Strategic Flood Risk Assessments.</u> 4.30iv: <u>Our understanding of flood risk is increasing. The Mayor is undertaking a Regional Flood Risk Appraisal and the Environment Agency is undertaking the Thames Estuary 2100 project and the Thames Catchment Flood Management Plan. These will all be important tools in managing flood risk and will need to be reflected in future spatial planning documents and decisions. Creating additional areas for flood storage will be an important flood risk management tool and the Environment Agency, Mayor and boroughs should work together to identify and safeguard such areas. These areas may have multiple uses.</u>	Partly endorse - see Recommendation 1.17  Partly endorse - see Recommendation 1.18 Endorse - see Recommendation 1.17
	4A.5vii	BN16d	The following text will be added to the end of Paragraph 4.90 in Policy 4A.5vii Sustainable drainage: ... <u>(see also Policy 4A.5v Living roofs and walls).</u>	Endorse
	4A.5vii, 4.90	List of Minor Corrections, et al	We will add references to <u>Living Roofs</u> and importance of retaining soft landscaping.	Endorse - see Recommendation 1.22
	4A.8	BN10	Para 4.19 addition of text: <u>Part L of the Building Regulations (2006) will be used as the minimum benchmark and the starting point for the assessment.</u>	Endorse - see Recommendation 1.11
	4A.11	List of Minor Corrections, et al	A reference will be added that reflects 'work with <u>adjoining Local Planning Authorities</u> ' Para 4.22i the reference to 'Action Framework,' will be replaced with ' <u>strategy</u> '	Endorse
	4A.11	BN10	An amendment to Policy 4A.11 to align the water use targets: <u>105 litres per person per day</u> Further information is also provided in the support text: <u>The water use target for residential development reflects the requirements of level 3 in the Government's Code for Sustainable Homes. The standards in the Sustainable Design and Construction SPG will be revised at the earliest opportunity to set out a timetable for moving to the Code levels 4 to 6 as essential standards. Future reviews of the London Plan will reflect this timetable and also look to set targets for non residential uses.</u>	Endorse - see Recommendation 1.23
	4A.12, 4A.13 4.27, 4.27i	List of Minor Corrections, et al	We will update 4A.12 and supporting paragraphs 4.27, 4.27i to support the Government's recently announced intention to build a large relief sewer under the Thames and to the Lower Lee Valley, this will recognise the planning issues involved and the need for sewage treatment capacity and sewage sludge handling as well as on going works to major sewage work.	Endorse - see Recommendation 1.24
	4A.14	List of Minor Corrections, et al	Para 4.28 the date of the EU legislation referenced will be added Text will also be added regarding ' <u>areas of relative tranquillity</u> ' showing how areas will be protected or enhanced	Endorse
	4A.15	BN10	Clarification of the Energy Hierarchy is proposed	Endorse - see Recommendation 1.4
	4A.15	List of Minor Corrections, et al	In the list of 'other bodies' the following text will be added ' <u>and other appropriate organisations</u> '	Endorse

Section	Policy	Published in	Action	Panel Response
	4A.15	BN16e	GOL's Change to 4A.15 at the end of the policy: <u>Integration of adaptation measures with mitigation to tackle climate change will be sought through the approach set out in Policy 4A.5iii.</u>	Endorse - see Recommendation 1.4
	4A.15	BN16d	Add in third para of policy text: particularly to address the problems of the most vulnerable. Para 4.4i Add at end: <u>He will participate in efforts to redress the effects of environmental inequality such as the impacts of higher summer temperatures on the elderly and the problems of fuel poverty.</u>	Endorse - see Recommendation 1.9
	General	BN16d	In the following parts of the plan the references to 'carbon' will be replaced by 'carbon dioxide': · Paragraph 4.13ii · Paragraph 4.13 · Policy 4A.2i – second bullet	Endorse - see Recommendation 1.9
	New Policy	BN10	New <u>Living Roofs</u> policy to follow FALP paragraph 4.30ii and will include suggested change that appears in BN16d	Endorse - see Recommendation 1.16
	New Policy	BN10	New policy for <u>Heating and Cooling Networks</u> , to follow FALP paragraph 4.19 and will include GoL's suggested change that appears in	Endorse - see Recommendation 1.12
	Para 4.1	BN71	Amend Paragraph 4.1 as follows: "...It will also enable the application of the 'proximity principle' – which states that waste should be disposed of one of the nearest appropriate installations."	Endorse - see also entry under Policy 4A.3 above
	Para 4.1ii	BN16d	4.1ii Add to penultimate sentence: <u>health and social and economic welfare</u> of vulnerable people.	Endorse - see Recommendation 1.6
<b>Chapter 4B</b>	4B.1	List of Minor Corrections, et al	A bullet point will be added to "address health inequalities and security issues and provide safe, secure and sustainable environments (see policies 3A.20 and 4B.5i)" 4th bullet point will be amended to read "respect local context, history, built heritage, character and communities." 11th bullet point will be amended to read: "respect the natural environment, and biodiversity and enhance green networks..." Last bullet will be deleted	Endorse
	4B.4	List of Minor Corrections, et al	The following will be added to the end of the 5th sentence of para 4.49: "...young people, disabled people and older people."	Endorse
	4B.13	List of Minor Corrections, et al	Policy will be amended to state the Mayor will 'agree' management plans rather than just 'prepare' them The following will be added at the end of the policy - "In considering planning applications the Mayor will, and Boroughs must, take account of, and give appropriate weight to, the provisions of World Heritage Site Management Plans"	Endorse - see Recommendation 5.8
<b>Chapter 4C</b>	Intro	List of Minor Corrections, et al	para 4.75 - we will reinstate ' <u>Annex 5 sets out an action plan for implementation</u> '	Endorse - see paragraph 2.17
	4C.3	List of Minor Corrections, et al	We will update paras 4.84i and 4.84ii to give accurate and up to date information on the Water Framework Directive and River Basin Management Plans.	Endorse - see Recommendation 2.2
	4C.12	List of Minor Corrections, et al	We will update OAs and AIs in accordance with revised list at Policy 2A.2	Endorse - see Recommendation 2.6
	4C.14 4C.28	BN 11 & List of Minor Corrections, et al	We will add "Development close to navigable waterways should seek to maximise water transport for bulk materials and waste." to policy 4C.14 and remove similar text from para 4.103, in policy 4C.28 we will change the FALP to "Development close to canals should seek to maximise water transport for bulk materials and waste. Opportunities should be taken to improve the biodiversity of canals." this is to be consistent between Policies 4C.12, 4C.14, 4C.28 and 3C.24.	Endorse as per BN11 Endorse - see paragraph 2.44
	4C.15	List of Minor Corrections, et al	We will amend the last sentence of para 4.104 to 'the safeguarding of wharves on the BRN will continue to be reviewed periodically in the future'	Endorse
	4C.26	BN55	The following text will be added to Para 4.131: <u>They should also be used to identify important riverside sites and determine the river related expectations for them.</u>	Endorse - see Recommendation 2.8
	4C.28	BN 11 & List of Minor Corrections, et al	Re-instate para 4.137 in Chapter 4B - following the relocation of design related policies from Chapter 4C.	Endorse
	4C.30	List of Minor Corrections, et al	Re-instate phrase ' <u>including former canal links and basins</u> ' in policy 4C.30	Endorse
	General	BN11	Re-instate <u>areas for intensification</u> .	Endorse - see Recommendation 2.6
	General	List of Minor Corrections, et al	Cross references will be added to other water related policies in Chapters 4A and 4B	Endorse
	General	List of Minor Corrections, et al	Sub sections of Chapter 4C will be retitled following removal of some policies to 4A and 4B	Endorse
<b>Chapter 5</b>	5A.1	List of Minor Corrections, et al	Clarification of relationship between SRDF and CAZ framework to be inserted	Endorse - see Recommendation 4.1 and paragraph 5.26
	5A.1	BN66	Amend 2nd Para as follows: 'Boroughs should <del>incorporate</del> <u>use</u> the Implementation Points from these Frameworks and Plans <del>to</del> <u>to inform</u> their DPDs and <del>in</del> development control decisions.'	Endorse - see Recommendation 4.2
	5B.1 5C.1	List of Minor Corrections, et al	Add a new bullet to 5B.1 North and 5C.1 North East sub-regions to read "... <u>improve public access for local communities to Lee Valley Regional Park.</u> "	Endorse
	5D.2	List of Minor Corrections, et al	Concept of London South Central Framework will be clarified.	Endorse
	5E.1	List of Minor Corrections, et al	Add a new bullet point to 5E.1 (South West): " <u>create a new regional park that integrates and contributes to the regeneration of the Wandle Valley Development Corridor.</u> "	Endorse
	5E.1	BN25	Last bullet point of policy 5E: replace: "support the strategic development of the growth corridor from Croydon through Gatwick to Brighton and collaborate..." with: " <u>support the strategic co-ordination of the development corridor from Croydon to Gatwick and</u>	Partly endorse - see Recommendation 3.5
	5E.3	List of Minor Corrections, et al	Add after the 2nd sentence in para 5.145: " <u>There is potential to improve the quality of the environment through the creation of a regional park as an integrated part of the wider regeneration of the valley. A new regional park has the potential to provide improved access to a linked network of open space, including parkland, wildlife areas, riverside walks, and facilities for children and young people, increasing the quality of the environment and contributing to the identity of the valley as place to live, work and visit (see policy 3D.10).</u> "	Endorse
	5F.1	List of Minor Corrections, et al	The word 'potentially' is to be deleted from the 8th bullet of Policy 5F.1 to read "manage the re-use of surplus industrial land..."	Endorse

Section	Policy	Published in	Action	Panel Response
	5G	List of Minor Corrections, et al	References to the River Thames including potential for transportation will be strengthened in the CAZ section of the plan.	Endorse
	5G.4	BN66	2nd bullet, the reference to the sequential test will be deleted.	Endorse - see Recommendation 5.3
	All Sub regions	List of Minor Corrections, et al	Explicit reference to health issues in all sub-regional sections to be incorporated where appropriate	Endorse
	5H.1 Para 5.96 Para 5.128 Para 5.170	BN54	Amendments to include references to ' <u>port capacity and logistics</u> '.	Endorse - see also paragraphs 3.4, 3.16 and 5.176
	Para 5.70	BN66	Add to the end of the Para: ' <u>The Legacy Masterplan Framework should reflect London Plan policy and also be coordinated with the Lower Lea Valley Opportunity Area Planning Framework.</u> '	Endorse - see paragraph 5.142
	Para 5.109	List of Minor Corrections, et al	Correct spelling 'Blackfriars' to be amended	Endorse
	Para 5.138	List of Minor Corrections, et al	Delete reference to 'Bromley' as not in the South West sub-region.	Endorse
	Para 5.141	BN22	As referred to in the Mayor's statement on Matter 5.3/2 (paragraph 9) the Mayor proposes to amend paragraph 5.141 to reflect that research into wholesale markets has been done.	Endorse - see Recommendation 5.13
	Para 5.146, 5.162	List of Minor Corrections, et al	Reference to planning frameworks in paragraphs 5.146 and 5.162 clarified.	Endorse
	Para 5.150	List of Minor Corrections, et al	Delete reference to 'Orpington' as not in the South West sub-region.	Endorse
	Para 5.183	BN22	As referred to in the Mayor's statement on Matter 5.1/2 (paragraph 4), the Mayor proposes to amend paragraph 5.183.	Endorse - see Recommendations 5.5, 5.6 & 5.7
	Para 5.193	List of Minor Corrections, et al	Reference to potential of river transportation along Thames to be considered in paragraph 5.193.	Endorse
	Para 5.200	BN31	A further clarification to Para. 5.200 will be added so that the first sentence reads " The Mayor is working with a broad range of partners to develop and pursue a 'joined up' approach to the Thames Gateway <u>as a whole.</u> " As a matter of updating, "due to be published in 2006" will be deleted from the last two lines of Para 5.200. The reference to 'London Thames Gateway Partnership' will also be corrected to ' <u>Thames Gateway London Partnership</u> ' in lines 3 and 4 of Para 5.200.	Endorse - as set out in Recommendation 4.4
	Para 5.36	BN22	As referred to in the Mayor's statement on Matter 5.1/2 (paragraph 4), Paragraph 5.36 will be amended by deleting the following text: 'This could be an appropriate location for a major convention centre as part of wider mixed use re-development'.	Endorse - see Recommendations 5.5, 5.6 & 5.7
	Para 5.67	List of Minor Corrections, et al	6th bullet in para 5.67 to be amended to read: " <u>Underground train service capacity improvements on central, district, Victoria and jubilee lines will be implemented in the sub-region.</u> "	Endorse
	Para 5.75	List of Minor Corrections, et al	Correct spelling 'Crossharbour' to be amended	Endorse
<b>Chapter 6</b>	6A.9	List of Minor Corrections, et al	<u>Primary Health Trusts</u> will be added to the health bullet	Endorse
	6A.10	List of Minor Corrections, et al	Para 6.70 add <u>Regional Flood Risk Assessment, Water Resources Plans, Periodic Reviews and Change Water Action Framework to Water Strategy</u>	Endorse
	Para 6.55	List of Minor Corrections, et al	The description of the Environment Agency will be expanded as advised in consultation.	Endorse
	Para 6.89	BN16	Para 6.89 should say 2026 not 2020	Endorse
	Para 6.91	BN16	Insert new Paragraph after Para 6.91 in Chapter 6C: <u>There will continue to be rapid and escalating global, European and national requirements to increase the immediacy and scale of climate change mitigation and adaptation as scientific evidence identifies the ever accelerating immensity of the challenge. There will be correspondingly fast and substantial changes in the quality, cost and effectiveness of technologies to address climate change. There will also be enormous shifts in behaviours: these will include the greater awareness of and responsiveness to the need for urgent action amongst stakeholders in spatial development, including developers, property interests and planners themselves. The Mayor has set out in his Climate Change Action Plan the many ways in which he will work with others to promote and support changes in policy, implementation and behaviour.</u>  <u>By the year 2026, in significant part as a result of climate change, Londoners will lead their lives in fundamentally different ways, including their forms of consumption, housing, working and travel. Spatial planning will need to anticipate, understand, lead and facilitate these chan</u>	Endorse - see Recommendation 1.9
	Para 6.94	BN16	Last sentence of Para 6.94 should say: <u>The Mayor will keep under review and consider...</u>	Endorse
	Para 6.98	BN16	Include a new first bullet point under Para 6.98: <u>changes in the policies on and funding for climate change mitigation and adaptation by Government and other stakeholders as identified in the Mayor's Climate Change Action Plan.</u>	Endorse
<b>Appendices</b>	Annex 1	List of Minor Corrections, et al	Isle of dogs' to be renamed ' <u>Crossharbour district centre</u> '  'Christ street' to be replaced as ' <u>Crisp Street</u> ' <u>Whitechapel</u> to be removed from CAZ frontage <u>Wentworth Street</u> to be added as CAZ frontage	Endorse - but see Recommendation 5.11 with respect to Canary Wharf  Endorse Endorse Endorse subject to Recommendation 5.2
	Annex 1	BN23 and BN66	A number of further changes in addition to those outlined above have been proposed to this Annex in BN23. Please note <u>Canary Wharf</u> will be maintained as a Major Center title.	Endorse - see Recommendation 5.11
	Annex 2	List of Minor Corrections, et al	East Lane to be redesignated from Industrial ' <u>Business Park</u> ' to ' <u>Preferred Industrial Location</u> '	Endorse

Section	Policy	Published in	Action	Panel Response
	Annex 4	List of Minor Corrections, et al	An additional sentence will be added to Para 37: 'The Mayor will use/apply these standards in considering applications for strategic developments'	Endorse
	Annex 5	List of Minor Corrections, et al	Bullet 10. We will change 3rd column "Further review of wharf safeguarding on BRN should be undertaken by 2010"	No comment
	Map 1.1 Map 1.2 Figure 1.1 Figure 1.2 Figure 1.3 Figure 1.4	List of Minor Corrections, et al	Maps and Figures updated to reflect the latest demographic and economic projections (shown in 'marked up' version of the plan used by the Panel).	Endorse and taken into account at paragraphs 5.7 to 5.20
	Map 4A.1	List of Minor Corrections, et al	The red triangle that presently lies in the south of Havering (just above the Thames) will be moved slightly west so that it lies on the border between Havering and Barking and Dagenham.	Endorse - Panel assumes that that this is Coldharbour Lane - see also paragraphs 5.155 to 5.164 and in particular 5.163
	Map 5A.1	List of Minor Corrections, et al	The Thames will be added for reference purposes	Endorse
	Map 5D.1	List of Minor Corrections, et al	Kidbrook 'to be replaced with 'Kidbrooke'	Endorse
	Map 5G.1	BN22 and BN66	Proposed re-casting of CAZ Diagram. Please note: On the version attached to BN22 there is a minor formatting error in that a 'layer' was left on the layout which left a gap in the area of the Thames in some other layers. This meant that the Opportunity Areas in the East and West of the CAZ were not represented as an arc spanning the river but were separated by it, and also that the Strategic Cultural Area did not extend to the borough boundary in the middle of the Thames in one place. It was also agreed that this would be renamed as per the 2004 London Plan as ' <u>Mixed uses with a strong arts, cultural or entertainment character</u> '.	Endorse - see Recommendations 5.1 & 5.4
	Table 3A.3	List of Minor Corrections, et al	Table will be amended to show Croydon has one authorised gypsy and traveller site (at Latham's Place)	Endorse
	Table 3C.1	List of Minor Corrections, et al	The indicative phasing for Bakerloo line Watford Junction scheme to be amended to "2012-17" instead of " 2006-2012"	Endorse
	Table 3D.1	List of Minor Corrections, et al	We will add 'Pocket Park' line to Table 3D.1 for open spaces of less than 0.4ha in size. Description: <u>Small areas of open space that provide natural surfaces and shaded areas for informal play and passive recreation that sometimes have seating and play equipment.</u>	Endorse
	Table 3D.2	List of Minor Corrections, et al	Amend Table 3D.2 Wasteland habitat line with: <u>Conserve extent - 185ha (conserved and/or created)*; Increase by 2015 - 0.</u> We will add note to explain no net loss: <u>"*The target for the Wasteland habitat differs from the others in Table 3D.2 as it is the Mayor's target, not that of the London Biodiversity Partnership, and it does not seek to protect the whole of the existing habitat resource. 185ha is the area of Wasteland habitat estimated within the framework of strategic importance for biodiversity set out in paragraph 3.256. This target should be used to inform the redevelopment of brownfield land so that important elements of Wasteland habitat are incorporated in development proposals as well as recreating the characteristics of the habitat within the design of new developments and public spaces, for example on green roofs."</u>	Endorse
	Table 4A.1	BN16	The Renewables Capacity Table will be expressed in terms of the percentage of electricity consumed or supplied.	Endorse - see Recommendation 1.8
	Table 6A.2	List of Minor Corrections, et al	Are references to 'North West' in Table 6A.2 will be changed to ' <u>West London</u> '	Endorse - see Recommendation 4.4
<b>Glossary</b>		BN16	Amendment to the definition of 'Major Development'	Endorse - see Recommendation 1.2
		BN66	Amendment to the definition of 'Sustainable Suburb'	Endorse - but assumed to refer to insertion of definition of "Sustainable Communities" Panel notes exchange of views in BN64 from LTF and BN66 from the Mayor. We consider that the definition suggested by LTF go beyond the scope of our remit with regard to the FALP and accept that the Mayor should use the Government definition.
<b>General</b>	General	List of Minor Corrections, et al	Replace the term 'flood defence' with ' <u>flood risk management</u> ' The status of London Plan SPGs and SRDFs will be made clearer. An index will be provided at the beginning of the Plan. All references to 'ALG' will be replaced with ' <u>London Councils</u> '	Endorse
	General	BN66	References to North West London sub-region will be amended to read ' <u>West London</u> ' sub-region throughout the Plan.	Endorse as Table 6A.2 item above.

**Appendix B Minor Corrections, Clarifications and Updates****Based on BN72**

Section	Policy	Published in	Action	Panel Response
<b>Intro/Preambl</b>	Preamble	List of Minor Corrections, et al	In Objective 2 the reference to 'housing mix policies' will be amended to 'overall housing mix'	Endorse
	I.1	BN66	Amend the wording in the fourth bullet point, Objective 1 as follows: · 'Make <u>the Thames Gateway parts</u> of North East and South East London the priority area for new development, regeneration and investment, including the prime location for the 2012 Olympic and Paralympic Games, introducing a new scale and quality of development (see also Chapter 5, Parts C and D).'	Endorse
<b>Chapter 1</b>	New Policy	BN54	Amendments to Paras 1.15 and 1.19 include reference to 'logistics'.	Endorse
	New Policy 1.3	BN25	Alter policy title from: "New Policy 1.3 Growth Areas" to: " <u>New Policy 1.3 Growth Areas and Development Corridors</u> " Paragraph 1.23, last bullet point (on London, Luton, Bedford regeneration corridor of city regional importance, page 9): delete: "which need strategic coordination" replace with: "The regional and local authorities will jointly examine timescales and mechanisms for the strategic co-ordination of these areas."	Partly endorse - see Recommendation 3.2
	Para 1.58	List of Minor Corrections, et al	The wording " <u>the Association of London Government</u> " will be replaced with " <u>London Councils</u> ".	Endorse
<b>Chapter 2</b>	2A.1	List of Minor Corrections, et al	8th bullet replace 'green networks' with ' <u>green infrastructure</u> .'	Endorse
	2A.1i	List of Minor Corrections, et al	3rd bullet of policy will be amended to read: "...North <u>East</u> and South East London..."	Endorse
	2A.1iii	List of Minor Corrections, et al	Text will indicate that the final boundary for CAZ should be for borough definition in LDFs. Proposal for CAZ framework will be expanded to include process, status and timescale as appropriate. Text will be amended to read ' <u>the CAZ framework will be prepared to inform the relevant DPDs</u> '.	Endorse - see also Chapter 4
	2A.4	BN66	Para 2.11, second to last sentence a reference to <u>the LDA</u> will be added. Para 2.12 the following will be added to the end of the Para: ' <u>...(see also Chapter 3B and the Mayor's Economic Development Strategy)</u> '.	Endorse as referring to 3rd to last sentence Endorse
	Para 2.18i	BN22	As referred to in the Mayor's statement on Matter 5.4/4 the Mayor proposes to amend paragraph 2.18i and references/footnotes	Endorse - see Recommendation 5.12
	Para 2.25	BN22	As referred to in the Mayor's statement on Matter 5.3/2 (paragraph 10) the Mayor proposes to amend paragraph 2.25.	Endorse - see Recommendation 5.15
<b>Chapter 3A</b>	3A.2i	List of Minor Corrections, et al	The wording ' <u>and commercial</u> ' will be deleted from policy text Para 3.15v, 2nd bullet insert into urban definition ' <u>and mansion blocks</u> ' Para 3.15vi insert 'existing or planned' in reference to areas where good public transport is planned	Endorse - see paragraphs 6.43 - 6.45 Endorse Endorse
	3A.2i	BN67	Delete at end of policy ' <u>(see section 6 of the Mayor's housing SPG)</u> '. Para 3.15v, 1st bullet, amend text as follows: Central – areas with very dense development, a mix of different uses, large building footprints and typically buildings of four to six stories, located within <u>800 metres</u> walking distance of a <u>metropolitan or major town centre</u> . Para 3.15v, 2nd bullet, delete '10 minutes walking distance' and insert ' <u>800 metres walking distance</u> '.	Endorse - see Recommendation 6.2
	3A.3	List of Minor Corrections, et al	Para 3.16add ' <u>long term vacant properties (empty for more than 6 months)</u> ' ' <u>there is a need to invest in maintaining and refurbishing housing stock so it does not become vacant</u> ' will be reinstated	Endorse
	3A.5	List of Minor Corrections, et al	Para 3.23 add ' <u>and social care</u> ' to end of para. The threshold will be revised to ' <u>...5 hectares or more, or that are capable of accommodating more than 500 dwellings</u> '.	Endorse
	3A.6	List of Minor Corrections, et al	Para 3.33 insert ' <u>comprising 20,800 social housing units and 2,500 intermediate units</u> '	Endorse
	3A.6	BN67	Para 3.26, add the following text: Intermediate Housing – Sub-market housing which is above target rents. But is substantially below open market levels and is affordable by households on incomes of <u>between £16,900 pa and £52,500 pa, with a monitoring midpoint of £35,600 pa (as at February 2007 to be reviewed annually to reflect changes in lower quartile house prices)</u> .	Endorse - see Recommendation 6.3
	3A.8i	List of Minor Corrections, et al	After Policy 3A.2i insert ' <u>... and Table 3A.2</u> '	Endorse
	3A.10	List of Minor Corrections, et al	Para 3.54i will be amended to list ' <u>extra care homes, residential care homes, nursing care homes, or other appropriate specialist housing for older persons</u> '	Endorse
	3A.14	List of Minor Corrections, et al	2nd sentence will be amended to include ' <u>including healthcare and social care</u> '. A reference to ' <u>Access to employment/skills development opportunities</u> ' will also be made. References to <u>playspace</u> and <u>open space</u> (Policy 3D.10 and 3D.11 respectively) will be added. A reference will be made to ' <u>policing facilities</u> ' Para 3.62i - will include reference to ' <u>environments that encourage walking and cycling</u> ' Para 3.65 - will include reference to: ' <u>increasing diversity of older people and living alone</u> '. Para 3.67ii - will include reference to ' <u>The provision of affordable youth, sports and leisure facilities has been shown statistically to be effective in reducing antisocial behaviour</u> '.	Endorse - but see paragraph 5.4. Enlarge to include reference to "policing facilities" in other Policies referred to below (not just Policy 3A.14)  Endorse Endorse Endorse
	3A.15	List of Minor Corrections, et al	The 1st sentence will have a reference to 'cycling' and a para will be added about 'convenience shops, banking facilities and post offices' (including a cross-reference to 3D)	Endorse with an additional reference to " <u>policing facilities</u> "
	3A.17	List of Minor Corrections, et al	Policy will be amended to include 'DPDs should include policies for the improvements of health of local population and reduction of health inequalities as set out in objectives...'	Endorse
	3A.19	List of Minor Corrections, et al	The following will be deleted from the policy ' <u>by protecting facilities that exist and</u> '	Endorse



Section	Policy	Published in	Action	Panel Response
	3A.20	List of Minor Corrections, et al	Para 3.87 - will be amended to read 'a high quality environment that encourages active travel'  Para 3.87 - will include a reference to the Health Issues BPG and the information it contains on Health Impact Assessment	Endorse with addition of "such as walking and cycling" after "active travel" Endorse
	3A.23	List of Minor Corrections, et al	The 8th bullet point will be split into two	Endorse with an additional reference to "policing facilities"
<b>Chapter 3B</b>	3B.1	List of Minor Corrections, et al	Para 3.118 - footnote (viii) will be moved to after '2026' to make clear how 6.6-8.9m has been arrived at	Endorse
	3B.2	List of Minor Corrections, et al	A cross reference will be added to the second half of policy, 3rd bullet, to strategically specified locations identified in Para 3.123 The 6th bullet will be amended to reflect additional office growth areas	Endorse - see also Recommendation 5.10  Not endorsed - how would this assist?
	3B.4	List of Minor Corrections, et al	Para 3.123 a cross reference will be added to the <u>strategically specified locations</u>	Endorsed - see also Recommendation 5.10
	3B.5	List of Minor Corrections, et al	A cross reference to Policy 2A.7 will be added	Endorse
	3B.5	BN22	As referred to in the Mayor's statement on Matter 5.3/3 (paragraph 11) the Mayor proposes to amend Policy 3B.5 by adding the following bullet point: - <u>the potential for surplus industrial land (as defined in assessments) to help meet strategic and local requirements for a mix of other uses such as housing and social infrastructure and where appropriate, contribute to town centre renewal.</u>	Endorse - see Recommendation 5.15
	3B.10	List of Minor Corrections, et al	The 2nd bullet point will be amended to state "...in town centres and other locations <u>across London</u> with good public transport access"	Endorse
	3B.12	List of Minor Corrections, et al	Amend to read 'Increase the productivity of London's businesses by tailoring supply side skills to employer led demand through the Mayor's London and Employment and skills board and sub-regional development implementation plans.' 3.151 - update to include 'London Skills and Employment Board' 3.151 - Additional comments relating to skill system, including reference to availability/requirement mismatches, funding disparities between FE colleges and private training, and the Leitch Review of Skills Para 3.156 will be amended to read "...and other barriers such as inter-generational underachievement, which prevent..."	Endorse - see also paragraphs 5.107, 5.136, 5.137 & 5.185
	Para 3.129iii	BN22 (also referred to in BN28)	As referred to in the Mayor's statement on Matter 5.3/2 (paragraph 9) Paragraph 3.129iii will be amended to refer to the results of feasibility studies on developing a sustainable food hub.	Endorse - see Recommendation 5.13
<b>Chapter 3C</b>	3C.2	List of Minor Corrections, et al	1st sentence of 2nd para replace 'Borough should take a strategic lead in exploring opportunities for development in areas where there is appropriate transport...' replace with 'Boroughs should take a strategic lead in <u>exploiting</u> opportunities for development in areas where appropriate transport accessibility and capacity <u>exists or is being introduced.</u> '	Endorse
	3C.4	List of Minor Corrections, et al	Para 3.166 - 5th bullet - replace 'national rail' with 'rail'	Endorse
	3C.5	List of Minor Corrections, et al	Para 3.169 1st bullet point include reference to Airtrack after 'to Heathrow airport' add ', <u>such as Airtrack</u> '	Endorse - see also paragraph 7.44
	3C.6	BN62	Amend paragraph 3.174 (additions underlined): "Policy 3C.6, <u>which applies to all airports in London</u> , will be reviewed in the light of the outcomes of current government studies on airport development, including the Project for the Sustainable Development of Heathrow (PSDH) upon which consultation is expected to take place later in 2007." Delete the following sentence from paragraph 3.175: "The proposed expansion at Stansted (and potentially later at Gatwick) is therefore supported, provided that the environmental effects are satisfactorily mitigated and that sufficient additional transport capacity, particularly by public transport is provided."	Endorse - see Recommendation 7.2  Endorse - see Recommendation 7.3
	3C.9	List of Minor Corrections, et al	Para 3.181i - in 3rd sentence clarify: 'the proposed transport schemes described in tables 3C.1 and 6A.2 will increase public transport capacity up to 50% compared to 2001' with 'the proposed transport schemes described in tables 3C.1 and 6A.2 will increase public transport capacity up to 50% <u>in year 2022</u> compared to 2001'	Endorse - see also paragraph 5.21 et seq
	3C.11	BN66	Para 3.186 the following text will be added to the end of the Para: ' <u>Under proposed legislation the south east London part of the line goes to Abbey Wood. The Mayor also supports the safeguarding of the route further east to Ebbfleet</u> ' along with the following footnote: ' <u>Crossrail. Crossrail Safeguarding Direction Abbey Wood to Hoo Junction. Department of Transport, 2005</u> '	Endorse - though the Panel suggest "of the route within London further east towards Ebbfleet" ie limiting the reference to the line within the London boundary
	3C.12	List of Minor Corrections, et al	Para 3.191 - After 1st sentence '...moving high volumes of people.' add new sentence ' <u>The line upgrades will be supported by other investments, in particular station capacity works, to enable full benefit of train service capacity increases. The upgrades will improve journey times and provide additional capacity enhancements across the network.</u> '. In 1st bullet Jubilee Line - replace 'an increase of about 48 per cent...' with 'an increase of about <u>45</u> per cent'	Endorse
	3C.12	List of Minor Corrections, et al	Para 3.192 amend 2nd sentence replace 'TfL is progressing this further following four major DLR projects in east London...' with ' <u>TfL is progressing four further major DLR projects in East London.</u> ' In 2nd Bullet replace 'Powers will be sought for phase 2...' with ' <u>Powers were sought in 2006 for phase 2....</u> '	Endorse
	3C.13	List of Minor Corrections, et al	Amend 1st bullet after 'transit schemes successful' add ' <u>and acknowledge their associated regeneration benefits and urban realm improvement opportunities</u> '	Endorse
	3C.18	List of Minor Corrections, et al	Para 3.199, 2nd sentence include reference to trams replace 'travelling by foot, cycle, bus or car...' with 'travelling by foot, cycle, bus, tram or car...' At end of para replace 'and Streetscape Guidance' with ' <u>and draft Streetscape Guidance.</u> ' Para 3.201, 1st sentence replace 'The central London congestion charging scheme and its planned western extension...' with ' <u>The central London congestion charging scheme and its western extension...</u> '	Endorse
	3C.20	List of Minor Corrections, et al	In first bullet point replace '...and using the TFL guidance Improving Walkability' with ' <u>...and based on the TFL guidance...</u> '	Endorse
	3C.24	BN62	Para 3.215, last sentence include word ' <u>rail</u> ' in two places to ensure clarity that the Plan is discussing rail issues.	Endorse - see Recommendation 7.8
	3C.25	List of Minor Corrections, et al	Replace 'strategic rail intermodal freight' with ' <u>Strategic Rail Freight Interchange</u> '	Endorse - see Recommendation 7.9

Section	Policy	Published in	Action	Panel Response
	3C.25	BN62	Delete all but the first sentence of paragraph 3.218, and replace the deleted sentences with a new sentence, as follows (addition underlined): "The former Strategic Rail Authority (SRA) identified a requirement for three or four large multi-modal freight facilities on or close to the periphery of London. <u>Additional guidance on the characteristics and requirements of strategic freight interchanges is set out in the Land for Transport SPG</u> ".	Partly endorsed - see Recommendation 7.10
<b>Chapter 3D</b>	3D.1	List of Minor Corrections, et al	Add sentence to end of paragraph 3.223ii to read: "Strategic and local assessments of need and capacity, informed by each other, will be part of the process for DPD preparation."	Endorse
	3D.4	List of Minor Corrections, et al	Change reference in Para 3.233 to read: "...the Barbican, the South Bank/Bankside, West End/Soho/Covent Garden..."	Endorse
	3D.6	List of Minor Corrections, et al	Clarify gross/net additional hotel bedroom requirement: Change Policy text 3D.6 to read: "...and to achieve <u>40,000 net</u> additional hotel bedrooms by 2026...". Change Para 3.240 to clarify "To accommodate potential growth a further <u>40,000 net</u> additional hotel bedrooms should be provided in the period up to 2026, in a range of suitable locations throughout London. <u>With the loss of some small scale low quality hotels, this is estimated to total an additional 50,000 gross total bedrooms. Loss of strategically important hotel capacity in appropriate locations should be resisted.</u> Addition to 4th bullet point of Policy 3D.6: "support the provision of a wide range of tourist accommodation, such as aparthotels... and <del>caravan sites, and resist the loss of strategically important hotel capacity.</del> "	Endorse
	3D.7	List of Minor Corrections, et al	Amend the title to read " <u>Realising the value of open space and green infrastructure</u> " 2nd para to replace 'green network' with 'green infrastructure.' Final sentence of policy add "...a positive contribution to and is integrated with the wider network." Para 3.246 delete 'major' from the first sentence.	Endorse
	3D.8	List of Minor Corrections, et al	Amend 3D.8 to read "...to improve environmental and landscape quality" Amend the last sentence to refer to improving " <u>landscape quality</u> "	Endorse Duplicates element of previous change
	3D.12	List of Minor Corrections, et al	Para 3.255, 2nd sentence replace 'English Nature' with ' <u>Natural England</u> ' A map will be added showing the broad areas described in Table 3D.2	Endorse
	3D.12	BN16d	In reference to the RSPB's written statement, the following sentence will be added to the end of Para 3.256 under Policy 3D.12 Biodiversity and nature conservation: <u>Priority should be given to connecting fragmented habitat and increasing the size of habitat areas with a view to increasing species' resilience to climate change.</u>	Endorse - see Recommendation 1.15
	3D.13	List of Minor Corrections, et al	Add a reference to Green Arc to sub-regions: (North 5B.1, South West 5E.1, West 5F.1) " <u>develop and support the Green Arc concept to improve the landscape quality and access to the open countryside in the urban fringe, working across local and regional boundaries</u> ".	Endorse but with reservations regarding desirability to avoid duplication between generic and sub regional policies
	3D.14	List of Minor Corrections, et al	Amend the 2nd sentence of para 3.263 to read: "...wildlife habitat, <u>natural resources</u> , ... improving air, soil and water quality..."	Endorse
	3D.15	List of Minor Corrections, et al	Amend the 3rd sentence of para 3.265 to read as follows: " <u>The 9th London Local Authorities Bill would enable Boroughs to re-use burial grounds in accordance with the scheme and provisions set out in the Bill.</u> "	Endorse
	Para 3.243	BN22	As referred to in the Mayor's statement on Matter 5.1/2 (paragraph 4), Paragraph 3.234 will be amended to reflect the latest position on the ICC.	Endorse - see Recommendations 5.5, 5.6 & 5.7
	Para 3.243i	BN66	A reference to ' <u>The Economic Development Strategy</u> ' will be added at the beginning of the para.	Endorse
<b>Chapter 4A</b>	4A.1	List of Minor Corrections, et al	Combine bullets 4 and 6 to read: " <u>Minimise the amount of energy used, and transport impacts from, the collection, treatment and disposal of waste in line with the Mayor's targets of reducing carbon emissions</u> ". Replace 'management of waste' with ' <u>treatment and disposal of waste</u> ' Revise penultimate para, replace 'especially where it enable the generation of hydrogen' with ' <u>especially where the products of waste treatment could be used as fuels e.g. Biofuels and hydrogen</u> '	Endorse
	4A.1	BN71	At the end of the 1st supporting paragraph, after policy bullet points, inset the following the text: <u>'The recycling and composting target for commercial and industrial waste arises from consultation on the modeling figure used for the Early Alterations to the London Plan (December 2006). The target is challenging but achievable, and reflects the current relatively high level of commercial and industrial recycling, which in 2003 was estimated to be 44 per cent.'</u>	Endorse
	4A.2	List of Minor Corrections, et al (also referred to BN71)	Amend first paragraph to read "In support of the Mayor's Municipal Waste Management Strategy, the aim of driving waste management up the waste hierarchy, the objectives of communities taking more responsibility for their own waste and <u>disposing of waste in one of the nearest appropriate installations</u> and the need to plan for all waste streams, the Mayor will, <u>where appropriate</u> , and DPD policies should:" Amend third bullet to read " <u>Identify new sites in suitable locations for new recycling and waste treatment facilities, such as MRFs, waste reuse and recycling centres (Civic Amenity sites), construction and demolition waste recycling plants and closed vessel composting.</u> "	Endorse
	4A.2i	List of Minor Corrections, et al	4th bullet point: 'manage overheating' will be replaced with ' <u>avoid internal overheating and excessive heat generation</u> ' 9th bullet point ' <u>using local suppliers wherever possible</u> ' will be added 12th bullet point: after 'through' ' <u>SUDS</u> ' will be added, and at end of the bullet 'for infrastructure and property' will be added	Endorse
	4A.2i	BN10	Addition of text to the supporting text of Policy 4A.2i: <u>In the light of the Government's Code for Sustainable Homes (December 2006), the relevant standards in the SPG will be reviewed at the earliest opportunity. The Mayor's Strategic Housing Investment Plan will set out the timetable for moving from Code level 3 to higher levels in the Code for publicly funded residential developments.</u>	Endorse - see Recommendation 1.1

Section	Policy	Published in	Action	Panel Response
	4A.2i	BN16d	The following wording will be added to the end of Paragraph 4.4ii: <u>The standards in the SPG on sustainable design and construction will be revised at the earliest opportunity to reflect both the FALP and to clarify any the issues in relation to the Code for Sustainable Homes. The Code and the SPG complement each other but affect development at different stages in the development process. There is a small overlap on specific issues between the documents but there are also considerable issues where only one of the documents provides advice. It is clear that the policies in the London Plan guide development at the beginning of the development process (particularly at the early design stages) and that the provisions of the Code are applied later on.</u>	Not endorsed - see paragraph 1.22
	4A.2ii	List of Minor Corrections, et al	A reference will be added to the recently published 'Climate Change Action Plan' Para 4.13ii the following new sentence will be added: <u>'the Mayor will work with partnerships by committing to work with London Energy Partnership, London Climate Change Agency, London Hydrogen Partnership and Local Authorities'</u>	Endorse - see paragraph 1.39
	4A.3	BN71	Amend paragraph 4.8 as follows: "...The proximity principle requires that waste be treated in <u>one of the</u> nearest appropriate installations."	Endorse
	4A.5i	List of Minor Corrections, et al	4th bullet point <u>'communal heating and cooling fuelled by renewable sources of energy'</u> will be added	Endorse
	4A.5i	BN10	Para 4.23ii add sentence: <u>CCHP and CHP will need to be sized to minimise carbon emissions.</u>	Endorse - see Recommendation 1.12
	4A.5i	BN16	Para 23ii, end of 4th sentence in, a cross reference will be added to the <u>Mayor's Air Quality strategy.</u>	No comment - see paragraph 1.85
	4A.5ii	List of Minor Corrections, et al	Para 4.23iii will be amended in reference to water by saying <u>'generate water as a by product'</u>	Endorse
	4A.5iii	BN10	Additional bullet point: <u>' - minimising water use (Policy 4A.11)</u>	Endorse - see Recommendation 1.14
	4A.5iii	BN16d	An additional bullet point will be added to Policy 4A.5iii: <u>' Green infrastructure</u>	Partly endorse - see Recommendation 1.14
	4A.5iv	List of Minor Corrections, et al	Para 4.30ii the following text will be added 'Expanding green networks to create 'breathing spaces' A reference to the 'role of building materials in reducing heat absorption' will be added A reference to the London Climate Change Partnership will be added along with their 'adapting to climate change: a checklist for development'	Endorse
	4A.5v, 4A.5vi, 4.30iii, 4.30iv, 4.88	List of Minor Corrections, et al	We will re write 4A.5v, 4A.5vi, 4.30iii, 4.30iv, 4.88 to be compliant with recently published PPS25 and acknowledge the role of the Regional Flood Risk Assessment, currently in preparation.	Endorse in principle - see paragraph 1.121 and Recommendations 1.17 to 1.20
	4A.5vi	BN16d	Add text after bullet points: <u>Opportunities should also be taken to identify and create new floodplain and restore all, or part of, natural floodplains to fulfil a flood risk management function.</u> Add text to supporting paras: 4.30iii: <u>Boroughs, either individually or collectively, will produce Strategic Flood Risk Assessments.</u> 4.30iv: <u>Our understanding of flood risk is increasing. The Mayor is undertaking a Regional Flood Risk Appraisal and the Environment Agency is undertaking the Thames Estuary 2100 project and the Thames Catchment Flood Management Plan. These will all be important tools in managing flood risk and will need to be reflected in future spatial planning documents and decisions. Creating additional areas for flood storage will be an important flood risk management tool and the Environment Agency, Mayor and boroughs should work together to identify and safeguard such areas. These areas may have multiple uses.</u>	Partly endorse - see Recommendation 1.17  Partly endorse - see Recommendation 1.18 Endorse - see Recommendation 1.17
	4A.5vii	BN16d	The following text will be added to the end of Paragraph 4.90 in Policy 4A.5vii Sustainable drainage: <u>... (see also Policy 4A.5v Living roofs and walls).</u>	Endorse
	4A.5vii, 4.90	List of Minor Corrections, et al	We will add references to <u>Living Roofs</u> and importance of retaining soft landscaping.	Endorse - see Recommendation 1.22
	4A.8	BN10	Para 4.19 addition of text: <u>Part L of the Building Regulations (2006) will be used as the minimum benchmark and the starting point for the assessment.</u>	Endorse - see Recommendation 1.11
	4A.11	List of Minor Corrections, et al	A reference will be added that reflects <u>'work with adjoining Local Planning Authorities'</u> Para 4.22i the reference to 'Action Framework,' will be replaced with <u>'strategy'</u>	Endorse
	4A.11	BN10	An amendment to Policy 4A.11 to align the water use targets: <u>105 litres per person per day</u> Further information is also provided in the support text: <u>The water use target for residential development reflects the requirements of level 3 in the Government's Code for Sustainable Homes. The standards in the Sustainable Design and Construction SPG will be revised at the earliest opportunity to set out a timetable for moving to the Code levels 4 to 6 as essential standards. Future reviews of the London Plan will reflect this timetable and also look to set targets for non residential uses.</u>	Endorse - see Recommendation 1.23
	4A.12, 4A.13 4.27, 4.27i	List of Minor Corrections, et al	We will update 4A.12 and supporting paragraphs 4.27, 4.27i to support the Government's recently announced intention to build a large relief sewer under the Thames and to the Lower Lee Valley, this will recognise the planning issues involved and the need for sewage treatment capacity and sewage sludge handling as well as on going works to major sewage work.	Endorse - see Recommendation 1.24
	4A.14	List of Minor Corrections, et al	Para 4.28 the date of the EU legislation referenced will be added Text will also be added regarding <u>'areas of relative tranquillity'</u> showing how areas will be protected or enhanced	Endorse
	4A.15	BN10	Clarification of the Energy Hierarchy is proposed	Endorse - see Recommendation 1.4
	4A.15	List of Minor Corrections, et al	In the list of 'other bodies' the following text will be added <u>'and other appropriate organisations'</u>	Endorse

Section	Policy	Published in	Action	Panel Response
	4A.15	BN16e	GOL's Change to 4A.15 at the end of the policy: <u>Integration of adaptation measures with mitigation to tackle climate change will be sought through the approach set out in Policy 4A.5iii.</u>	Endorse - see Recommendation 1.4
	4A.15	BN16d	Add in third para of policy text: particularly to address the problems of the most vulnerable. Para 4.4i Add at end: <u>He will participate in efforts to redress the effects of environmental inequality such as the impacts of higher summer temperatures on the elderly and the problems of fuel poverty.</u>	Endorse - see Recommendation 1.9
	General	BN16d	In the following parts of the plan the references to 'carbon' will be replaced by 'carbon dioxide': · Paragraph 4.13ii · Paragraph 4.13 · Policy 4A.2i – second bullet	Endorse - see Recommendation 1.9
	New Policy	BN10	New <u>Living Roofs</u> policy to follow FALP paragraph 4.30ii and will include suggested change that appears in BN16d	Endorse - see Recommendation 1.16
	New Policy	BN10	New policy for <u>Heating and Cooling Networks</u> , to follow FALP paragraph 4.19 and will include GoL's suggested change that appears in	Endorse - see Recommendation 1.12
	Para 4.1	BN71	Amend Paragraph 4.1 as follows: "...It will also enable the application of the 'proximity principle' – which states that waste should be disposed of <u>one of the nearest appropriate installations.</u> "	Endorse - see also entry under Policy 4A.3 above
	Para 4.1ii	BN16d	4.1ii Add to penultimate sentence: <u>health and social and economic welfare</u> of vulnerable people.	Endorse - see Recommendation 1.6
<b>Chapter 4B</b>	4B.1	List of Minor Corrections, et al	A bullet point will be added to " <u>address health inequalities and security issues and provide safe, secure and sustainable environments (see policies 3A.20 and 4B.5i)</u> " 4th bullet point will be amended to read " <u>respect local context, history, built heritage, character and communities.</u> " 11th bullet point will be amended to read: " <u>respect the natural environment, and biodiversity and enhance green networks...</u> " Last bullet will be deleted	Endorse
	4B.4	List of Minor Corrections, et al	The following will be added to the end of the 5th sentence of para 4.49: " <u>...young people, disabled people and older people.</u> "	Endorse
	4B.13	List of Minor Corrections, et al	Policy will be amended to state the Mayor will 'agree' management plans rather than just 'prepare' them The following will be added at the end of the policy - " <u>In considering planning applications the Mayor will, and Boroughs must, take account of, and give appropriate weight to, the provisions of World Heritage Site Management Plans</u> "	Endorse - see Recommendation 5.8
<b>Chapter 4C</b>	Intro	List of Minor Corrections, et al	para 4.75 - we will reinstate ' <u>Annex 5 sets out an action plan for implementation</u> '	Endorse - see paragraph 2.17
	4C.3	List of Minor Corrections, et al	We will update paras 4.84i and 4.84ii to give accurate and up to date information on the Water Framework Directive and River Basin Management Plans.	Endorse - see Recommendation 2.2
	4C.12	List of Minor Corrections, et al	We will update OAs and AIs in accordance with revised list at Policy 2A.2	Endorse - see Recommendation 2.6
	4C.14 4C.28	BN 11 & List of Minor Corrections, et al	We will add " <u>Development close to navigable waterways should seek to maximise water transport for bulk materials and waste.</u> " to policy 4C.14 and remove similar text from para 4.103, in policy 4C.28 we will change the FALP to " <u>Development close to canals should seek to maximise water transport for bulk materials and waste. Opportunities should be taken to improve the biodiversity of canals.</u> " this is to be consistent between Policies 4C.12, 4C.14, 4C.28 and 3C.24.	Endorse as per BN11 Endorse - see paragraph 2.44
	4C.15	List of Minor Corrections, et al	We will amend the last sentence of para 4.104 to ' <u>the safeguarding of wharves on the BRN will continue to be reviewed periodically in the future</u> '	Endorse
	4C.26	BN55	The following text will be added to Para 4.131: <u>They should also be used to identify important riverside sites and determine the river related expectations for them.</u>	Endorse - see Recommendation 2.8
	4C.28	BN 11 & List of Minor Corrections, et al	Re-instate para 4.137 in Chapter 4B - following the relocation of design related policies from Chapter 4C.	Endorse
	4C.30	List of Minor Corrections, et al	Re-instate phrase ' <u>including former canal links and basins</u> ' in policy 4C.30	Endorse
	General	BN11	Re-instate <u>areas for intensification</u> .	Endorse - see Recommendation 2.6
	General	List of Minor Corrections, et al	Cross references will be added to other water related policies in Chapters 4A and 4B	Endorse
	General	List of Minor Corrections, et al	Sub sections of Chapter 4C will be retitled following removal of some policies to 4A and 4B	Endorse
<b>Chapter 5</b>	5A.1	List of Minor Corrections, et al	Clarification of relationship between SRDF and CAZ framework to be inserted	Endorse - see Recommendation 4.1 and paragraph 5.26
	5A.1	BN66	Amend 2nd Para as follows: 'Boroughs should <del>incorporate</del> <u>use</u> the Implementation Points from these Frameworks and Plans <del>in</del> <u>to inform</u> their DPDs and <del>in</del> development control decisions.'	Endorse - see Recommendation 4.2
	5B.1 5C.1	List of Minor Corrections, et al	Add a new bullet to 5B.1 North and 5C.1 North East sub-regions to read " <u>..improve public access for local communities to Lee Valley Regional Park.</u> "	Endorse
	5D.2	List of Minor Corrections, et al	Concept of London South Central Framework will be clarified.	Endorse
	5E.1	List of Minor Corrections, et al	Add a new bullet point to 5E.1 (South West): " <u>create a new regional park that integrates and contributes to the regeneration of the Wandle Valley Development Corridor.</u> "	Endorse
	5E.1	BN25	Last bullet point of policy 5E: replace: "support the strategic development of the growth corridor from Croydon through Gatwick to Brighton and collaborate..." with: " <u>support the strategic co-ordination of the development corridor from Croydon to Gatwick and</u>	Partly endorse - see Recommendation 3.5
	5E.3	List of Minor Corrections, et al	Add after the 2nd sentence in para 5.145: " <u>There is potential to improve the quality of the environment through the creation of a regional park as an integrated part of the wider regeneration of the valley. A new regional park has the potential to provide improved access to a linked network of open space, including parkland, wildlife areas, riverside walks, and facilities for children and young people, increasing the quality of the environment and contributing to the identity of the valley as place to live, work and visit (see policy 3D.10).</u> "	Endorse
	5F.1	List of Minor Corrections, et al	The word 'potentially' is to be deleted from the 8th bullet of Policy 5F.1 to read "manage the re-use of surplus industrial land..."	Endorse

Section	Policy	Published in	Action	Panel Response
	5G	List of Minor Corrections, et al	References to the River Thames including potential for transportation will be strengthened in the CAZ section of the plan.	Endorse
	5G.4	BN66	2nd bullet, the reference to the sequential test will be deleted.	Endorse - see Recommendation 5.3
	All Sub regions	List of Minor Corrections, et al	Explicit reference to health issues in all sub-regional sections to be incorporated where appropriate	Endorse
	5H.1 Para 5.96 Para 5.128 Para 5.170	BN54	Amendments to include references to ' <u>port capacity and logistics</u> '.	Endorse - see also paragraphs 3.4, 3.16 and 5.176
	Para 5.70	BN66	Add to the end of the Para: ' <u>The Legacy Masterplan Framework should reflect London Plan policy and also be coordinated with the Lower Lea Valley Opportunity Area Planning Framework.</u> '	Endorse - see paragraph 5.142
	Para 5.109	List of Minor Corrections, et al	Correct spelling 'Blackfriars' to be amended	Endorse
	Para 5.138	List of Minor Corrections, et al	Delete reference to 'Bromley' as not in the South West sub-region.	Endorse
	Para 5.141	BN22	As referred to in the Mayor's statement on Matter 5.3/2 (paragraph 9) the Mayor proposes to amend paragraph 5.141 to reflect that research into wholesale markets has been done.	Endorse - see Recommendation 5.13
	Para 5.146, 5.162	List of Minor Corrections, et al	Reference to planning frameworks in paragraphs 5.146 and 5.162 clarified.	Endorse
	Para 5.150	List of Minor Corrections, et al	Delete reference to 'Orpington' as not in the South West sub-region.	Endorse
	Para 5.183	BN22	As referred to in the Mayor's statement on Matter 5.1/2 (paragraph 4), the Mayor proposes to amend paragraph 5.183.	Endorse - see Recommendations 5.5, 5.6 & 5.7
	Para 5.193	List of Minor Corrections, et al	Reference to potential of river transportation along Thames to be considered in paragraph 5.193.	Endorse
	Para 5.200	BN31	A further clarification to Para. 5.200 will be added so that the first sentence reads " The Mayor is working with a broad range of partners to develop and pursue a 'joined up' approach to the Thames Gateway <u>as a whole.</u> " As a matter of updating, "due to be published in 2006" will be deleted from the last two lines of Para 5.200. The reference to 'London Thames Gateway Partnership' will also be corrected to ' <u>Thames Gateway London Partnership</u> ' in lines 3 and 4 of Para 5.200.	Endorse - as set out in Recommendation 4.4
	Para 5.36	BN22	As referred to in the Mayor's statement on Matter 5.1/2 (paragraph 4), Paragraph 5.36 will be amended by deleting the following text: 'This could be an appropriate location for a major convention centre as part of wider mixed use re-development'.	Endorse - see Recommendations 5.5, 5.6 & 5.7
	Para 5.67	List of Minor Corrections, et al	6th bullet in para 5.67 to be amended to read: " <u>Underground train service capacity improvements on central, district, Victoria and jubilee lines will be implemented in the sub-region.</u> "	Endorse
	Para 5.75	List of Minor Corrections, et al	Correct spelling 'Crossharbour' to be amended	Endorse
<b>Chapter 6</b>	6A.9	List of Minor Corrections, et al	<u>Primary Health Trusts</u> will be added to the health bullet	Endorse
	6A.10	List of Minor Corrections, et al	Para 6.70 add <u>Regional Flood Risk Assessment, Water Resources Plans, Periodic Reviews and Change Water Action Framework to Water Strategy</u> .	Endorse
	Para 6.55	List of Minor Corrections, et al	The description of the Environment Agency will be expanded as advised in consultation.	Endorse
	Para 6.89	BN16	Para 6.89 should say 2026 not 2020	Endorse
	Para 6.91	BN16	Insert new Paragraph after Para 6.91 in Chapter 6C: <u>There will continue to be rapid and escalating global, European and national requirements to increase the immediacy and scale of climate change mitigation and adaptation as scientific evidence identifies the ever accelerating immensity of the challenge. There will be correspondingly fast and substantial changes in the quality, cost and effectiveness of technologies to address climate change. There will also be enormous shifts in behaviours: these will include the greater awareness of and responsiveness to the need for urgent action amongst stakeholders in spatial development, including developers, property interests and planners themselves. The Mayor has set out in his Climate Change Action Plan the many ways in which he will work with others to promote and support changes in policy, implementation and behaviour.</u>  <u>By the year 2026, in significant part as a result of climate change, Londoners will lead their lives in fundamentally different ways, including their forms of consumption, housing, working and travel. Spatial planning will need to anticipate, understand, lead and facilitate these chan</u>	Endorse - see Recommendation 1.9
	Para 6.94	BN16	Last sentence of Para 6.94 should say: <u>The Mayor will keep under review and consider...</u>	Endorse
	Para 6.98	BN16	Include a new first bullet point under Para 6.98: <u>: changes in the policies on and funding for climate change mitigation and adaptation by Government and other stakeholders as identified in the Mayor's Climate Change Action Plan.</u>	Endorse
<b>Appendices</b>	Annex 1	List of Minor Corrections, et al	'Isle of dogs' to be renamed ' <u>Crossharbour district centre</u> '  'Christ street' to be replaced as ' <u>Crisp Street</u> ' <u>Whitechapel</u> to be removed from CAZ frontage <u>Wentworth Street</u> to be added as CAZ frontage	Endorse - but see Recommendation 5.11 with respect to Canary Wharf  Endorse Endorse Endorse subject to Recommendation 5.2
	Annex 1	BN23 and BN66	A number of further changes in addition to those outlined above have been proposed to this Annex in BN23. Please note <u>Canary Wharf</u> will be maintained as a Major Center title.	Endorse - see Recommendation 5.11
	Annex 2	List of Minor Corrections, et al	East Lane to be redesignated from Industrial 'Business Park' to 'Preferred Industrial Location'	Endorse

Section	Policy	Published in	Action	Panel Response
	Annex 4	List of Minor Corrections, et al	An additional sentence will be added to Para 37: 'The Mayor will use/apply these standards in considering applications for strategic developments'	Endorse
	Annex 5	List of Minor Corrections, et al	Bullet 10. We will change 3rd column "Further review of wharf safeguarding on BRN should be undertaken by 2010"	No comment
	Map 1.1 Map 1.2 Figure 1.1 Figure 1.2 Figure 1.3 Figure 1.4	List of Minor Corrections, et al	Maps and Figures updated to reflect the latest demographic and economic projections (shown in 'marked up' version of the plan used by the Panel).	Endorse and taken into account at paragraphs 5.7 to 5.20
	Map 4A.1	List of Minor Corrections, et al	The red triangle that presently lies in the south of Havering (just above the Thames) will be moved slightly west so that it lies on the border between Havering and Barking and Dagenham.	Endorse - Panel assumes that that this is Coldharbour Lane - see also paragraphs 5.155 to 5.164 and in particular 5.163
	Map 5A.1	List of Minor Corrections, et al	The Thames will be added for reference purposes	Endorse
	Map 5D.1	List of Minor Corrections, et al	Kidbrook 'to be replaced with 'Kidbrooke'	Endorse
	Map 5G.1	BN22 and BN66	Proposed re-casting of CAZ Diagram. Please note: On the version attached to BN22 there is a minor formatting error in that a 'layer' was left on the layout which left a gap in the area of the Thames in some other layers. This meant that the Opportunity Areas in the East and West of the CAZ were not represented as an arc spanning the river but were separated by it, and also that the Strategic Cultural Area did not extend to the borough boundary in the middle of the Thames in one place. It was also agreed that this would be renamed as per the 2004 London Plan as 'Mixed uses with a strong arts, cultural or entertainment character'.	Endorse - see Recommendations 5.1 & 5.4
	Table 3A.3	List of Minor Corrections, et al	Table will be amended to show Croydon has one authorised gypsy and traveller site (at Latham's Place)	Endorse
	Table 3C.1	List of Minor Corrections, et al	The indicative phasing for Bakerloo line Watford Junction scheme to be amended to "2012-17" instead of " 2006-2012"	Endorse
	Table 3D.1	List of Minor Corrections, et al	We will add 'Pocket Park' line to Table 3D.1 for open spaces of less than 0.4ha in size. Description: Small areas of open space that provide natural surfaces and shaded areas for informal play and passive recreation that sometimes have seating and play equipment.	Endorse
	Table 3D.2	List of Minor Corrections, et al	Amend Table 3D.2 Wasteland habitat line with: <u>Conserve extent - 185ha (conserved and/or created)*; Increase by 2015 - 0.</u> We will add note to explain no net loss: " <u>*The target for the Wasteland habitat differs from the others in Table 3D.2 as it is the Mayor's target, not that of the London Biodiversity Partnership, and it does not seek to protect the whole of the existing habitat resource. 185ha is the area of Wasteland habitat estimated within the framework of strategic importance for biodiversity set out in paragraph 3.256. This target should be used to inform the redevelopment of brownfield land so that important elements of Wasteland habitat are incorporated in development proposals as well as recreating the characteristics of the habitat within the design of new developments and public spaces, for example on green roofs.</u> "	Endorse
	Table 4A.1	BN16	The Renewables Capacity Table will be expressed in terms of the percentage of electricity consumed or supplied.	Endorse - see Recommendation 1.8
	Table 6A.2	List of Minor Corrections, et al	Are references to 'North West' in Table 6A.2 will be changed to 'West London'	Endorse - see Recommendation 4.4
<b>Glossary</b>		BN16	Amendment to the definition of 'Major Development'	Endorse - see Recommendation 1.2
		BN66	Amendment to the definition of 'Sustainable Suburb'	Endorse - but assumed to refer to insertion of definition of "Sustainable Communities" Panel notes exchange of views in BN64 from LTF and BN66 from the Mayor. We consider that the definition suggested by LTF go beyond the scope of our remit with regard to the FALP and accept that the Mayor should use the Government definition.
<b>General</b>	General	List of Minor Corrections, et al	Replace the term 'flood defence' with 'flood risk management' The status of London Plan SPGs and SRDFs will be made clearer. An index will be provided at the beginning of the Plan. All references to 'ALG' will be replaced with 'London Councils'	Endorse
	General	BN66	References to North West London sub-region will be amended to read 'West London' sub-region throughout the Plan.	Endorse as Table 6A.2 item above.

## CORE DOCUMENT LIBRARY

### EU Documents

Library ref. no.	Title	Date	Source
EU001	<a href="#">Water Framework Directive</a>	2000	European Commission

### Central Government Documents

Library ref. no.	Title	Date	Source	Website
CG001	<a href="#">The Eddington Transport Study</a>	2006	DfT	www.dft.gov.uk
CG002	<a href="#">Wind Energy and Aviation Interests Interim Report</a>	2002	BWEA	www.bwea.com
CG003	<a href="#">Air Transport White Paper Progress Report</a>	2006	DfT	www.dft.gov.uk
CG004	<a href="#">Thames Gateway Interim Plan</a>	2006	DCLG	www.communities.gov.uk
CG005	<a href="#">Code for Sustainable Homes</a>	2006	DCLG	www.communities.gov.uk
CG006	<a href="#">Climate Change Supplement to PPS1</a>	2006	DCLG	www.communities.gov.uk
CG007	<a href="#">Building a Greener Future</a>	2006	DCLG	www.communities.gov.uk

CG008	<a href="#">Changes to Planning Obligations: a Planning-gain Supplement consultation</a>	2006	DCLG	www.communities.gov.uk
CG009	<a href="#">Circular 05/05: Planning Obligations</a>	2005	DCLG	www.communities.gov.uk
CG010	<a href="#">Energy Efficiency Guide 19</a>	2000	Energy Efficiency	www.cibse.org
CG011	<a href="#">Barker Review of Land Use Planning</a>	2006	DCLG	www.communities.gov.uk
CG012	<a href="#">Draft Climate Change Bill</a>	2007	Defra	www.defra.gov.uk
CG013	<a href="#">Strategic Planning in London. GOL Circular 1/2000</a>	2000	GOL	www.gos.gov.uk/gol
CG014	<a href="#">Guidance on Tall Buildings. Consultation 2007</a>	2007	EH/CABE	www.english-heritage.org.uk
CG015	<a href="#">Creating Sustainable Communities: Greening the Gateway</a>	2004	ODPM	www.communities.gov.uk
CG016	<a href="#">Thames Catchment Flood Management Plan</a>	2007	EA	www.environment-agency.gov.uk
CG017	<a href="#">Assessing the Costs of Compliance with the Code for Sustainable Homes</a>	2007	EA	www.environment-agency.gov.uk
CG018	<a href="#">Review of England's Waste Strategy</a>	2006	Defra	www.defra.gov.uk
CG019	<a href="#">Sustainable Communities: building for the future</a>	2003	ODPM	www.communities.gov.uk
CG020	<a href="#">Capital Homes: London Housing Strategy 2005 - 2016</a>	2005	DCLG	www.communities.gov.uk
CG021	<a href="#">Secretary of State's Proposed Changes to the Draft Revision to the Regional Spatial Strategy for the East of England and Statement of Reasons</a>	2006	GO-EE	www.go-east.gov.uk
CG022	<a href="#">East of England Plan</a>	2004	EERA	www.eera.gov.uk



CG023	<a href="#">Changes to Waste Management Decision Making Principles</a>	2005	DEFRA	www.defra.gov.uk
CG024	<a href="#">Guidance on background information to accompany notifications under the Energy Act</a>	2006	DTI	www.dti.gov.uk
CG025	<a href="#">Statutory Instrument 2000 No 1491 The Town and Country Planning (London Spatial Development Strategy) Regulations 2000</a>	2000	HM Govt	www.opsi.gov.uk
CG026	<a href="#">Statutory Instrument 2000 No 1493</a>	2000	HM Govt	www.opsi.gov.uk
CG027	<a href="#">Planning Policy Statement 1 - Delivering Sustainable Development</a>	2005	DCLG	www.communities.gov.uk
CG028	<a href="#">Planning Policy Statement 3 –Housing</a>	2006	DCLG	www.communities.gov.uk
CG029	<a href="#">Planning Policy Statement 6 – Planning for Town Centres</a>	2005	DCLG	www.communities.gov.uk
CG030	<a href="#">Planning Policy Statement 7 – Sustainable Development in Rural Areas</a>	2004	ODPM	www.communities.gov.uk
CG031	<a href="#">Planning Policy Statement 9 – Biodiversity and Geological Conservation</a>	2005	ODPM	www.communities.gov.uk
CG032	<a href="#">Planning Policy Statement 10 – Planning for Sustainable Waste Management</a>	2005	ODPM	www.communities.gov.uk
CG033	<a href="#">Planning Policy Statement 12 – Local Development Frameworks</a>	2004	ODPM	www.communities.gov.uk
CG034	<a href="#">Planning Policy Statement 22 – Renewable Energy</a>	2004	ODPM	www.communities.gov.uk
CG035	<a href="#">Planning Policy Statement 23 – Planning &amp; Pollution Control</a>	2004	ODPM	www.communities.gov.uk
CG036	<a href="#">Planning Policy Statement 25 – Development and Flood Risk</a>	2006	DCLG	www.communities.gov.uk
CG037	<a href="#">The Future of Air Transport – Aviation White Paper</a>	2003	DfT	www.dft.gov.uk

CG038	<a href="#">GLA Act 1999 Section 41</a>	1999	HM Govt	www.opsi.gov.uk
CG039	<a href="#">Planning Policy Statement 11 – Regional Spatial Strategies</a>	2004	ODPM	www.communities.gov.uk
CG040	<a href="#">Planning for a Sustainable Future – white paper</a>	2007	DCLG	www.communities.gov.uk
CG041	<a href="#">Meeting the Energy Challenge – White Paper</a>	2007	DTI	www.dti.gov.uk
CG042	<a href="#">Growth and regeneration in the Thames Gateway</a>	2004	Mayor of London / EERA / SEERA	www.london.gov.uk
CG043	<a href="#">Planning Policy Guidance 2: Green Belts</a>	2001	ODPM	www.communities.gov.uk
CG044	<a href="#">Planning Policy Guidance 4: Industrial, Commercial development and small firms</a>	1992	ODPM	www.communities.gov.uk
CG045	<a href="#">Planning Policy Guidance 5: Simplified Planning Zones</a>	1992	DOE	www.communities.gov.uk
CG046	<a href="#">Planning Policy Guidance 8: Telecommunications</a>	2001	ODPM	www.communities.gov.uk
CG047	<a href="#">Planning Policy Guidance 13: Transport</a>	2001	ODPM	www.communities.gov.uk
CG048	<a href="#">Planning Policy Guidance 14: Development on unstable land</a>	1990	DOE	www.communities.gov.uk
CG049	<a href="#">Planning Policy Guidance 15: Planning &amp; the historic environment</a>	1994	DOE	www.communities.gov.uk
CG050	<a href="#">Planning Policy Guidance 16: Archaeology</a>	1990	ODPM	www.communities.gov.uk
CG051	<a href="#">Planning Policy Guidance 17: Planning for open space, sport and recreation</a>	2002	ODPM	www.communities.gov.uk
CG052	<a href="#">Planning Policy Guidance 18: Enforcing planning control</a>	1991	DOE	www.communities.gov.uk

CG053	<a href="#">Planning Policy Guidance 19: Outdoor advertisement control</a>	1992	DOE	www.communities.gov.uk
CG054	<a href="#">Planning Policy Guidance 20: Coastal Planning</a>	1992	DOE	www.communities.gov.uk
CG055	<a href="#">Planning Policy Guidance 24: Planning &amp; Noise</a>	1994	ODPM	www.communities.gov.uk
CG056	<a href="#">Waste Strategy for England 2007</a>	2007	DEFRA	www.defra.gov.uk
CG057	<a href="#">Strategic Housing Market Assessments</a>	2007	DCLG	www.communities.gov.uk
CG058	<a href="#">East of England Plan – Report of the Panel</a>	2006	GOEE	www.go-east.gov.uk
CG059	<a href="#">Stern Review – The Economics of Climate Change</a>	2007	HM Treasury	www.hm-treasury.gov.uk
CG060	A clear vision for the south east. <a href="#">The South East Plan</a>	2006	SEERA	www.southeast-ra.gov.uk

### London-wide Documents

Library ref. no.	Title	Date	Source
LW001	<a href="#">The Draft Further Alterations to the London Plan (Spatial Development Strategy for Greater London)</a>	2006	Mayor of London
LW002	<a href="#">The London Plan</a>	2004	Mayor of London
LW003	<a href="#">Reviewing the London Plan. Statement of Intent from the Mayor</a>	2005	Mayor of London
LW004	<a href="#">The London Plan Monitoring Report 2007</a>	2007	Mayor of London

LW005	<a href="#">The London Plan Monitoring Report 2006</a>	2006	Mayor of London
LW006	<a href="#">The London Plan Monitoring Report 2005</a>	2005	Mayor of London
LW007	<a href="#">Report of the West End Central Retail Area Planning and Development Commission</a>	2006	Mayor of London
LW008	<a href="#">Transport 2025: transport vision for a growing world city</a>	2006	TfL
LW009	<a href="#">The Economic Contribution of the Aviation Industry in the UK</a>	1999	Oxford Economic Forecasting
LW010	<a href="#">Future Growth in the Outer London Economy</a>	2006	LSE
LW011	<a href="#">London Plan Density Matrix Review</a>	2006	Mayor of London
LW012	<a href="#">Integrating renewable energy into new developments toolkit</a>	2004	Mayor of London
LW013	<a href="#">London Carbon Scenarios to 2026</a>	2006	Mayor of London
LW014	<a href="#">Mayors Living Roofs Statement</a>	2006	Mayor of London
LW015	<a href="#">London Freight Plan</a>	2006	TfL
LW016	<a href="#">The Mayors Energy Strategy</a>	2004	Mayor of London
LW017	<a href="#">Community Heating Development Study</a>	2005	Mayor of London
LW018	<a href="#">London's Wholesale Markets Review</a>	2007	Mayor of London
LW019	<a href="#">Draft Early Alterations to the London Plan</a>	2005	Mayor of London

LW020	<a href="#">City Limits: a resource flow and ecological footprint analysis of Greater London</a>	2002	City Limits London
LW021	<a href="#">London's Warming: the impacts of climate change</a>	2002	LCCP
LW022	<a href="#">Adapting to Climate Change: Lessons for London</a>	2002	LCCP
LW023	<a href="#">Interim Household Projections: Data Management and Analysis Group</a>	2006	Mayor of London
LW024	<a href="#">The Mayors Transport Strategy</a>	2001	Mayor of London
LW025	<a href="#">Greater London Housing Requirements Study</a>	2004	Mayor of London
LW026	<a href="#">2004 London Housing Capacity Study</a>	2005	Mayor of London
LW027	<a href="#">Housing – The London Plan Supplementary Planning Guidance</a>	2005	Mayor of London
LW028	<a href="#">Sustainable Design and Construction: Supplementary Guidance</a>	2006	Mayor of London
LW029	<a href="#">London Divided</a>	2002	Mayor of London
LW030	<a href="#">Connecting with London's nature – Mayors Biodiversity Strategy</a>	2002	Mayor of London
LW031	<a href="#">Cleaning London's Air – The Mayors Air Quality Strategy</a>	2002	Mayor of London
LW032	<a href="#">Mayor's Municipal Waste Management Strategy</a>	2003	Mayor of London
LW033	<a href="#">Mayors Draft London Ambient Noise Strategy</a>	2005	Mayor of London
LW034	<a href="#">Safeguarded Wharves on the River Thames</a>	2005	Mayor of London

LW035	<a href="#">Thresholds for Application of Affordable Housing Requirements</a>	2003	GLA
LW036	<a href="#">Analysis of the Transport Programme to Support the Draft London Plan</a>	2003	TfL
LW037	<a href="#">Size Matters – the need for more family homes in London</a>	2006	London Assembly
LW038	<a href="#">Environmental Justice in London</a>	2004	LSx
LW039	<a href="#">Supporting People Strategy</a>	2005	ALG
LW040	<a href="#">Draft SPG: Planning for Equality &amp; Diversity in London</a>	2006	Mayor of London
LW041	<a href="#">The Mayors Ambient Noise Strategy Progress Report</a>	2005	Mayor of London
LW042	<a href="#">SPG: Land for Transport Functions</a>	2007	Mayor of London
LW043	<a href="#">Improving Walkability</a>	2005	TfL
LW044	<a href="#">Cycling Action Plan</a>	2004	TfL
LW045	<a href="#">TfL Five Year Investment Programme – 2005/6 – 2009/10</a>	2005	TfL
LW046	<a href="#">BPG: The Control of dust and emissions during demolition</a>	2006	Mayor of London
LW047	<a href="#">Principles of Inclusive Design</a>	2006	CABE
LW048	<a href="#">London Waste Apportionment Study Update &amp; Further Sensitivity Testing</a>	2007	Mayor of London
LW049	<a href="#">Mayors Climate Change Action Plan</a>	2007	Mayor of London

LW050	<a href="#">London Plan: Housing Provision Targets, Waste &amp; Mineral Alterations</a>	2006	Mayor of London
LW051	<a href="#">Water Matters: The Mayors Draft Water Strategy</a>	2007	Mayor of London
LW052	<a href="#">Sustainability Appraisal of the Draft Further Alterations to the London Plan</a>	2006 (reissued 2007)	Mayor of London
LW053	<a href="#">Sub-Regional Development Framework – Central London</a>	2006	Mayor of London
LW054	<a href="#">Sub-Regional Development Framework – West London</a>	2006	Mayor of London
LW055	<a href="#">Sub-Regional Development Framework – South London</a>	2006	Mayor of London
LW056	<a href="#">Sub-Regional Development Framework – North London</a>	2006	Mayor of London
LW057	<a href="#">Sub-Regional Development Framework – East London</a>	2006	Mayor of London
LW058	<a href="#">London Waste Apportionment Study</a>	2006	Mayor of London
LW059	<a href="#">Borough Level Waste Apportionment – Revised draft minor alteration</a>	2006	Mayor of London
LW060	<a href="#">North East and South East London Industrial Land Baseline</a>	2007	Mayor of London
LW061	<a href="#">Evidence Base: Climate Change in the FALP</a>	2007	Mayor of London
LW062	<a href="#">London Industrial Land Release Benchmarks</a>	2007	Mayor of London
LW063	<a href="#">London-wide Town Centre Health Checks 2006 analysis</a>	2007	Mayor of London
LW064	<a href="#">Demand and Supply of Land for Logistics in London</a>	2007	Mayor of London

LW065	<a href="#">Draft Early Alterations to the London Plan. Examination in Public 2006. Panel Report</a>	2006	Mayor of London
LW066	<a href="#">Climate Change and London's Transport systems summary</a>	2005	LCCP
LW067	<a href="#">Adapting to Climate Change: Business as Usual?</a>	2006	LCCP
LW068	<a href="#">Adapting to Climate Change Impacts – good practice guide for sustainable communities</a>	2006	LCCP
LW069	<a href="#">Adapting to Climate Change: a checklist for development</a>	2005	LCCP
LW070	<a href="#">Adapting to Climate Change: a case study companion</a>	2007	LCCP
LW071	<a href="#">Investing in London's Low Carbon Future summary</a>	2007	LCCA
LW072	<a href="#">London Wind &amp; Biomass Study Summary Report</a>	2007	LCCA
LW073	<a href="#">Towards Zero Carbon Developments</a>	2006	LCCA
LW074	<a href="#">Making ESCO's Work</a>	2007	LCCA
LW075	<a href="#">Sustainable Energy Training &amp; Pilot Support Programme</a>	2005	LCCA
LW076	<a href="#">Planning Policy: making it happen</a>	2007	LCCA
LW077	<a href="#">Thames Gateway Evidence Review</a>	2006	DCLG
LW078	<a href="#">Keeping the UK Competitive</a>	2006	London First
LW079	<a href="#">Children and Young People's views on the London Plan: climate change – GLA report</a>	2007	NCB



LW080	<a href="#">Children and Young People's views on the London: climate change – NCB report</a>	2007	NCB
LW081	<a href="#">What works in preventing and re-engaging young people NEET in London – research paper</a>	2007	Mayor of London
LW082	<a href="#">Outer London: Issues for the London Plan</a>	2007	Mayor of London
LW083	<a href="#">London Office Policy Review 2007</a>	2007	Mayor of London
LW084	<a href="#">Employment projections for London by sector and borough</a>	2007	Mayor of London
LW085	<a href="#">Valuing older People – Mayors Older People Strategy</a>	2006	Mayor of London
LW086	<a href="#">Valuing older People - Highlights</a>	2006	Mayor of London
LW087	<a href="#">Providing for Children &amp; Young People's Play &amp; Recreation – Draft SPG</a>	2006	Mayor of London
LW088	<a href="#">Review of London's Sub Regional Boundaries</a>	2006	Mayor of London
LW089	<a href="#">Making London Better for all children and young people</a>	2004	Mayor of London
LW090	<a href="#">Sustainability Appraisal of the London Plan</a>	2004	Mayor of London
LW091	<a href="#">Sustaining success – developing London's economy</a>	2005	Mayor of London
LW092	<a href="#">Industrial &amp; Warehousing Land Demand in London</a>	2004	Mayor of London
LW093	Draft Regional Flood Risk Appraisal	2007	Mayor of London
LW094	<a href="#">Draft London Plan. Examination in Public. Panel Report.</a>	2003	Mayor of London

LW095	<a href="#">Convenience Goods Floorspace Needs</a>	2005	Mayor of London
LW096	<a href="#">Comparison Goods Floorspace Needs</a>	2004	Mayor of London
LW097	<a href="#">Suburbs and the Historic Environment</a>	2007	EA
LW098	<a href="#">Industrial and Warehousing Land Demand in London</a>	2004	Mayor of London

### Borough Documents

Library ref. no.	Title	Date	Source
B001	<a href="#">Hammersmith &amp; Fulham Local Development Framework</a>	2007	LB Hammersmith & Fulham
B002	VOID		
B003	<a href="#">Destination Wembley – A framework for development</a>	2003	LB Brent

### Referenced Documents – Documents referenced in submitted written statements.

Library ref. no.	Title	Date	Source	Submitted by
WS001	<a href="#">Howbury Marshes Planning Application</a>	2006	Mayor of London	CPRE
WS002	<a href="#">SEERAS Appraisal</a>	2002	SEERA	SEERA

WS003	<a href="#">Implications of the Aviation White Paper for South East EnMayor of Londonnd</a>	2005	SEERA	SEERA
WS004	<a href="#">Implications of the Progress Report on the Future of Air Transport White Paper for South East England</a>	2007	SEERA	SEERA,
WS005	<a href="#">Intergovernmental Panel of Climate Change, Working Group three</a>	2007	IPCC	EA
WS006	<a href="#">Consultation on Identifying Areas of Water Stress</a>	2007	EA	EA
WS007	<a href="#">Water Efficiency in the South East of EnMayor of Londonnd</a>	2007	EA	EA
WS008	<a href="#">Hidden Infrastructure: The Pressures on Environmental Infrastructure</a>	2007	EA	EA
WS009	Image of multi-story industrial development	2007	Brixton plc	DTZ
WS010	<a href="#">Urban Waste Water Treatment Directive (91/27/EEC)</a>	1991	EC	EA
WS011	<a href="#">The Blue Ribbon Network – Heart of London</a>	2006	London Assembly	London Forum
WS012	<a href="#">EC Council Directive 1999/30/EC</a>	1999	EC 1999	EA
WS013	<a href="#">Project for the Sustainable Development of Heathrow (website only)</a>	N/a	DfT	EA
WS014	<a href="#">FCDPAG3 Economic Appraisal Supplementary Note to Operating Authorities</a>	2006	Defra	EA
WS015	<a href="#">Impact Assessment Report Inclusion of Aviation in the EU Greenhouse Gas Emissions Trading Scheme since December 2006</a>	2006	EC 2006	EA
WS016	<a href="#">IEA District Heating and Cooling</a>	2007	IEA Website	WPA
WS017	<a href="#">Water Efficiency in New Buildings</a>	2006	DCLG	WPA

WS018	<a href="#">Carbon Emission Factors for UK Energy Use</a>	2007	Market Transformation Programme	WPA
WS019	<a href="#">Capital Gains: Making Density Housing Work in London</a>	2002	London Housing Federation	CRSL
WS020	<a href="#">Higher Density Housing for Families</a>	2002	London Housing Federation	CRSL
WS021	<a href="#">Middle of our street</a>	2005	London Housing Federation	CRSL
WS022	<a href="#">Appeal Decision – Duelguide Property Investment Ltd v London Borough of Southwark</a>	2007	Inspectors Summary	CRSL
WS023	<a href="#">Planning for Future Police Estate Development</a>	2005	MPA 2005	MPA
WS024	<a href="#">Property for Policing</a>	2007	MPA 2007	MPA
WS025	<a href="#">Making the Connections: Final Report on Transport and Social Exclusion - summary</a>	2003	ODPM 2003	Transport 2000
WS026	<a href="#">Foodstores in London: The Potential for Providing Housing</a>	2002	Tesco/HC	Tesco
WS027	<a href="#">Green Alchemy: Turning Green to Gold</a>	2004	LDA	LCCA
WS028	<a href="#">Decentralising Power: An energy revolution for the 21<sup>st</sup> Century</a>	2005	Greenpeace	LCCA
WS030	<a href="#">Evidence Base: Climate Change in FALP (Duplicate of LW061)</a>	2007	Bellway Homes	Bellway Homes
WS031	<a href="#">White City Opportunity Area: Framework for Development</a>	2004	Hammersmith & Fulham	Hammersmith & Fulham
WS032	<a href="#">Hammersmith &amp; Fulham sites allocation – draft preferred options</a>	N.d.	Hammersmith & Fulham	Hammersmith & Fulham
WS033	<a href="#">Oxford, Regent St, Bond Street Action Plan</a>	2007	WCC	WCC

WS034	<a href="#">ICC Commission Report</a>	2005	London ICC	LDA and Mayor of London
WS035	<a href="#">Tomorrow's Suburbs – Piloting the Sustainable Suburbs Toolkit</a>	N.d.	Groundwork London	Groundwork London
WS036	<a href="#">When does green mean go?</a>	2007	CBRE	London First
WS037	<a href="#">Milton Keynes Local Plan 2001-11</a> (extract)	2005	MK Council	London First
WS038	<a href="#">Kings Cross Central Energy Assessment</a>	2005	Arup	London First
WS039	Typical Dwelling Energy Demand and Baseline CO <sup>2</sup> emissions	2007	Fulcrum	Fulcrum Consulting
WS040	<a href="#">The EU's Contribution to shaping a future global change regime</a>	2007	Europa	FoE
WS041	<a href="#">High Stakes – Designing emissions pathways to reduce the risk of dangerous climate change</a>	2006	IPPR	FoE
WS042	<a href="#">Growth Scenarios for EU and UK aviation</a>	N.d.	Tyndall Centre	FoE
WS043	<a href="#">The impacts of air transport on London</a>	2004	LSD	FoE
WS044	<a href="#">SEERA March 2007 Bulletin</a>	2007	SEERA	FoE
WS045	<a href="#">The Urban Environment</a>	2007	RCEP	FoE
WS046	Table- estimated emissions of carbon dioxide 1970-2005	N.d.	IPCC	FoE
WS047	<a href="#">The UK Government Sustainable Development Strategy</a>	2005	DEFRA	FoE
WS048	<a href="#">Air Quality in London 2005 – 2006 – provisional analysis</a>	2006	London Air	FoE

WS049	<a href="#">Primary PM10 in London is increasing</a>	2006	London Air	FoE
WS050	<a href="#">Low Carbon Transport for London</a>	2006	Transport 2000	FoE
WS051	<a href="#">Guidance on the Appraisal of walking and cycling schemes</a>	2007	DTI	FoE
WS052	<a href="#">Projected Air Quality Impacts Summary</a>	2006	TfL	FoE
WS053	<a href="#">Thames Gateway Bridge Decision Due</a>	2007	FoE	FoE
WS054	<a href="#">Making the Connections: Final report on transport and social exclusion</a>	2003	ODPM	FoE
WS055	<a href="#">London Economic Development Snapshot</a>	2007	LDA	FoE
WS056	<a href="#">The Future Starts Here: The route to a low-carbon economy</a>	2006	Co-op/FOE	FoE
WS057	<a href="#">Pie in the Sky – why the costs of airport expansion outweigh the benefits</a>	2006	FoE	FoE
WS058	<a href="#">Employment opportunity for all: tackling worklessness in London - summary</a>	2007	HM Treasury	?
WS059	<a href="#">Thames Gateway RDA Economic Statement</a>	2006	EEDA/SEEDA/LDA	?
WS060	<a href="#">A cost review of the Code for Sustainable Homes</a>	2007	Housing Corporation/English Partnerships	HBF
WS061	<a href="#">Policy Paper on Aviation and Airport Development in London and the South East</a>	2007	Atkins	NLSA
WS062	<a href="#">Water Efficiency in London</a>	2007	EA	EA
WS063	<a href="#">Effect of exposure to traffic on lung development from 10 to 18 years of age</a>	2007	The Lancet	FoE

WS064	<a href="#">Building Houses or creating communities?</a>	2007	SDC	FoE
WS065	<a href="#">North-West London to Luton corridor</a>	2007	NLSA	NLSA

## List of Briefing Notes

Ref	Title	Tabled By <sup>1</sup>	Matter	Date
BN1	Early Alterations Panel Recommendations for FALP	Mayor		
BN2	Housing Provision after 2016/17	Mayor		
BN3	Provision of accommodation for gypsies and travellers	Mayor		
BN4	Amendments to the SA report	Mayor		
BN5	GLA list of minor corrections, clarifications and updates	Mayor		
BN6	Implications of the Building a Greener Future package	Mayor		
BN7	Employment Projections	Mayor		
BN8	GLA's response to the Panel on minor matters	Mayor		
BN9	Review of the impact of energy policies in the London Plan	LSBU		
BN10	Proposed wording change to Chapter 4A	Mayor		
BN11	Blue Ribbon Network minor corrections response	Mayor		
BN12	Panel's response to the GLA list of minor corrections, clarifications and updates	Panel		
BN13	Waste apportionment seminar notes	Mayor		
BN14	Thames Estuary 2100 Report	EA		
BN15	Limiting Global Warming to 2 degrees	FOE	1.1/1.2	18/6/07
BN16A	Proposed wording changes to policy 4A.2i	GOL	1.1/1.2	19/6/07
BN16/Bi	Building Services Journal article by James Thonger	Mayor	1.1/1.2	20/06/07
BN16/Bii	Response to Thonger article by Mayors office	Mayor	1.1/1.2	20/6/07
BN16/Biii	Response to Thonger article by LCCA	LCCA	1.1/1.2	20/6/07
B16/C	London First summary of changes requested	London First	1.1/1.2	21/6/07
BN16/D	Text changes arising from EIP on Matter 1	Mayor	1	21/6/07
BN16/E	Proposed wording changes to Chapter 4A	Mayor	1.2	22/6/07
BN16/F	GLA response to London First paper	Mayor	1.1/1.2	25/6/07
BN16/G	Response to Thonger article LCCA	Mayor	1.1/1.2	25/6/07
BN16/H	Addendum to BN16	Mayor	1.1/1.2	25/6/07

<sup>1</sup> BN1-14 received and published prior to the EiP.



BN17	EA response to the TE2100 Executive Summary	EA	1.2	19/6/07
BN18	Draft Regional Flood Risk appraisal	Mayor	1	19/6/07
BN19	HM v Lady Berkeley transcription	Thamesbank	2	21/6/07
BN20	Thamesbank opening statement	Thamesbank	2	21/6/07
BN21	NHPAU work programme 2007-08	GOL	3	22/06/07
BN22	Matter 5 proposed wording changes by GLA	Mayor	5	22/06/07
BN23	GLA Note to Panel of 5.1/3	Mayor	5	22/06/07
BN24A	Draft minutes of Inter Regional Forum	IRF	3	25/06/07
BN24B	Agenda item 5 of Inter Regional Forum minutes	IRF	3	25/06/07
BN25	Proposed changes to policy 1.3 and 5E.1 from GLA	Mayor	3	25/06/07
BN26	Note to Panel on relationship between CAZ/SRDFs/proposals for growth areas	Mayor	4	26/06/07
BN27	Document produced for EIP Hearing 28.6.07	Haringey Fed	5.1/1	28/06/07
BN28	Note to the Panel on Matter 5	Mayor	5.2.1	28/6/07
BN29	Mayor's opening statement	Mayor	-	28/6/06
BN30	Deputy Mayor's statement	Mayor	-	28/6/07
BN31	GLA Response to Gateway to London	Mayor	4	29/6/07
BN32	GLA additional note on Matter 6.4	Mayor	6.4	3/7/07
BN33	GLA response to BN27	Mayor	5.1	3/7/07
BN34	Fulcrum response to BN16/D and BN10	Fulcrum	1	4/7/07
BN35	GOL proposed wording changes	GOL	1	4/7/07
BN36	GOL text changes arising from discussions	GOL	1	4/7/07
BN37	Gateway to London response to BN26	Gateway to London	5	5/7/07
BN38	GOL comments on BN22	GOL	5.1	5/7/07
BN39	GOL comments on BN23	GOL	5.1	5/7/07
BN40	NLSA response to BN27	NLSA	5.1	5/7/07
BN41	Canary Wharf comments on BN22 and BN23	CWG	5.1	5/7/07
BN42	Greenwich Council response to BN23	Greenwich	5.1	5/7/07
BN43	Central London Partnership response to BN26	CLP	5.1	5/7/07
BN44	GOL comments on BN26	GOL	5.2	4/7/07

BN45	Hammersmith & Fulham response to BN28 and BN23	H&F	5.2	5/7/07
BN46	Covent Garden Market Authority response to BN28	CGMA	5.2	5/7/07
BN47	London Civic Forum proposed amendment to 2.23v	LCF	5.4	5/7/07
BN48	London Forum proposed changes Matter 6	The Forum	6/1 & 6/2	5/7/07
BN49	London Forum proposed changes to Matter 6	The Forum	6/3 & 6/4	5/7/07
BN50	Email from English Heritage to London Forum re Matter 6	EH	6	5/7/07
BN51	Highways Agency response to BN7	HA	7	5/7/07
BN52	CGCA response to BN28	CGCA	5.1	9/7/07
BN53	Tesco comments on BN23	Tesco	5.1	9/7/07
BN54	Logistics provision across wider South East	Mayor	5.3	10/7/07
BN55	Proposed revised text 4.131	Mayor	2	10/7/07
BN56	LFACS comments on briefing notes	The Forum	5	10/7/07
BN57	John Lewis comments on BN23	John Lewis	5.1	11/07/07
BN58	NLSA comments on briefing notes	NLSA	5	11/07/07
BN59	Email from Hammersmith & Fulham Historic Buildings Group	HFHBG	NA	11/07/07
BN60	Email from Hammersmith Society	Hammersmith Soc.	NA	11/07/07
BN61	Text of evidence from London Tenants Federation	LTF	6	11/07/07
BN62	Matter 7 Transport – proposed changes from Mayor	Mayor	7	13/07/07
BN63	Comments on BN32 from LTF	LTF	6.4	13/07/07
BN64	Notes on Matter 5.4/2 by LTF	LTF	5.4/2	20/07/07
BN65	GOL supplementary note on recycling	GOL	8.2	19/07/07
BN66	GLA further wording changes matters 4 and 5	Mayor	4 and 5	20/07/07
BN67	Proposed changes to Housing chapter	Mayor	6	20/07/07
BN68	Proposed changes freight policies	GOL	7	23/07/07
BN69	Response to BN51 by Mayor	Mayor	7	23/07/07
BN70	Briefing on waste issues by Mayor	Mayor	8	23/07/07
BN71	Proposed changes on waste	Mayor	8	23/07/07
BN72	Complete list of FALP amendments submitted in EIP	Mayor	All	23/07/07
BN73	Recycling Targets in the Further Alterations to the London Plan	London Councils	8	24/07/07

## List of Abbreviations

### Participants

AEF	Aviation Environment Forum
ALBPO	Association of London Borough Planning Officers
BAA	British Airports Association
BPF	British Property Federation
BW	British Waterways
CLP	Central London Partnership
CGCA	Covent Garden Community Association
CGMA	Covent Garden Market Authority
CHPA	Combined Heat and Power Association
CPA	City Property Association
CPRE	Council for the Protection of Rural England
CRSL	Consortium of Registered Social Landlords
CWG	Canary Wharf Group plc
EA	Environment Agency
EERA	East of England Regional Assembly
EH	English Heritage
ELWA	East London Waste Authorities
FoR	Freight on Rail
FC	Fulcrum Consulting
FoE	Friends of the Earth
GLA	Greater London Authority
GOL	Government Office for London
GtL	Gateway to London
HA	Highways Agency
HBF	Homebuilders Federation
HCC	Hertfordshire County Council
HFRA	Haringey Federation of Residents Associations
The/the Assembly	London Assembly
LC	London Councils
LCF	London Civic Forum
LCCP	London Climate Change Partnership
LDA	London Development Agency
The/the Forum	London Forum of Amenity and Civic Societies
LSx	London Sustainability Exchange
LTF	London Tenants Federation
LTGDC	London Thames Gateway Development Corporation

---

LWC	London Waterways Commission
NLP	Nathanial Lichfield Partners
NLSA	North London Strategic Alliance
NWL	Neptunes Wharf Limited
NT	National Trust
PAFL	Planning Aid for London
RN	Regents Network
RSPB	Royal Society for the Protection of Birds
RTS	River Thames Society
SEERA	South East of England Regional Assembly
SLP	South London Partnersip
SPG	Supplementary Planning Guidance
TB	Thamesbank
TCPA	Town & Country Planning Association
TfL	Transport for London
TGLP	Thames Gateway London Partnership
Thames Water	Thames Water Property Services
WLP	West London Partnership
WPOA	Westminster Property Owners Association

**Other Abbreviations used in the Report**

AAP	Area Action Plan
AfR	Area for Regeneration
AfI	Area for Intensification
AMR	Annual Monitoring Report
BME	Black and Minority Ethnic
BN	Briefing Note
BPG	Best Practice Guide
BREEAM	Building Research Establishment's Environmental Assessment Method
BRN	Blue Ribbon Network
CAA	Civil Aviation Authority
CAZ	Central Activities Zone
CCAP	Climate Change Action Plan
CCHP	Combined Cooling Heat and Power
CE	Cambridge Econometrics
CEBR	Centre for Economic and Business Research
CHP	Combined Heat and Power
C&IW	Commercial and Industrial Waste
CSH	Code for Sustainable Homes
DCLG	Department for Communities and Local Government
Defra	Department for Food and Rural Affairs

---

DfT	Department for Transport
DPD	Development Plan Documents
DTI	Department of Trade and Industry
EALP	Early Alterations to the London Plan
EBS	Experian Business Strategies
EiP	Examination in Public
ERN	English Regions Network
ESCO	Energy Services Company
FALP	Further Alterations to the London Plan
FRA	Flood Risk Assessment
FZM	Flood Zone Map
HGV	Heavy Goods Vehicle
Hr/ha	Habitable room per hectare
IBP	Industrial Business Park
IDM	Integrated Demand Management
IRF	Inter-Regional Forum
LATS	Landfill Allowances Trading Scheme
LDD	Local Development Documents
LDF	Local Development Framework
LEP	London Energy Partnership
LLB	London-Luton-Bedford Corridor
MMS	Multi Modal Study
MOL	Metropolitan Open Land
MSW	Municipal Solid Waste
nd	Not dated
OA	Opportunity Area
ODPM	Office of the Deputy Prime Minister
OE	Oxford Economics
OMA	Outer Metropolitan Area
ONS	Office of National Statistics
PDL	Previously Developed Land
PIL	Preferred Industrial Location
PINS	Planning Inspectorate
PPG	Planning Policy Guidance Note
PPS	Planning Policy Statement
PSC	Principal Service Centre
PSDH	Project for the Sustainable Development of Heathrow
RFRA	Regional Flood Risk Appraisal
RFI	Rail Freight Interchange
RPG	Regional Planning Guidance
RPB	Regional Planning Body
RSS	Regional Spatial Strategy

RTAB	Regional Technical Advisory Body
RTS	Regional Transport Strategy
SA	Sustainability Appraisal
SDS	Spatial Development Strategy
SEA	Strategic Environmental Assessment
SEL	Strategic Employment Location
SFRA	Strategic Flood Risk Assessment
SHN	Strategic Highway Network
SIL	Strategic Industrial Location
SME	Small and medium sized enterprises
SRA	Strategic Rail Authority
SPG	Supplementary Planning Guidance
SRC	Sub-Regional Centre(s)
SRDF	Sub Regional Development Framework
SRIF	Sub Regional Implementation Framework
UDC	Unitary Development Corporation
UDP	Unitary Development Plan
WESRPA	West End Special Retail Area

## Plan Reviews

Appendix F relates to the Overview in this Report. It consists of two sections. The first reproduces the issues raised by the Panel Chair at the end of the EiP. The second contains the Mayor's response.

### F. 1 Issues raised by the Panel Chair (5/7/07)

#### Scope of Reviews and Alterations

The purpose of this question is not to debate or criticise the FALP but to see whether there are lessons which can be learned not just for London but for other Regions when Alterations or Partial Reviews will be taking place.

The Panel, and some of the parties, have had some difficulty in defining the scope of the EiP. We think we have done this successfully and are content with the process. But, the difficulties are these.

First, the FALP contain some major changes (ie the Climate Change or the Sub regions) but also a whole range of other changes throughout the Plan. Most of these are minor but some are significant and we have felt the need to include them in the EiP – leading at times to a somewhat fragmented debate. As an example, the Transport and Housing chapters have not been substantially changed but there are issues we needed to pick up; similarly the changes to the BRN – though the Mayor saw them as minor – were controversial and led to substantial debate.

Second, parties have found it hard to confine themselves to the Alterations. This is understandable because in some cases the FALP could be seen to have implications for parts of the Plan which remain unchanged and which are beyond our remit. Some quite profound points have been made by participants which the Panel will be unable to advise upon because they are beyond the scope of the EiP.

The Panel would welcome the views of the GLA on these points. (We have no intention of opening them up for general debate). Obviously the GLA are aware of the problems. They know that the Panel had some difficulty in defining the list of matters (and expanded it in response to comments); and that debate at the EiP has tended to range beyond the FALP.

Have the GLA any thoughts on how future reviews or alterations – in London or elsewhere – might avoid these problems. Should, for example future Alterations be more clearly defined – avoiding changes throughout the Plan and concentrating on specific parts of it which need review? Are there ways in which the parties might be helped at an early stage to appreciate and comment on the scope of changes in future cases? Are there any other thoughts which the GLA can offer?

## **F.2 The Mayor's Response (9/7/07)**

### **Scope of Reviews and Alterations**

The Panel has asked us to respond to how EiPs can handle RSSs that are being altered or partially reviewed. They appreciate that in London we have more experience having been through one alterations EiP and being in the middle of a second. They wish to hear from us on our thoughts about how EiPs can deal with some of the difficulties.

Chris Shepley has shared with us what he sees to be the difficulties:

1. The FALP contain some major changes (ie the Climate Change or the Sub regions) but also a whole range of other changes throughout the Plan. Most of these are minor but some are significant and we have felt the need to include them in the EiP – leading at times to a somewhat fragmented debate. As an example, the Transport and Housing chapters have not been substantially changed but there are issues we needed to pick up; similarly the changes to the BRN – though the Mayor saw them as minor – were controversial and lead to substantial debate.
2. Parties have found it hard to confine themselves to the Alterations. This is understandable because in some cases the FALP could be seen to have implications for parts of the Plan that remain unchanged and beyond our remit. Some quite profound points have been made by participants which the Panel will be unable to advise upon because they are beyond the scope of the EiP.

The Panel is interested in knowing our thoughts on how these problems might be dealt with or avoided in future. In response we suggest the following:

1. We recognise the difficulties identified by the Panel and welcome the Panel's invitation to comment. RSS alterations are not adequately covered by PPS11. Most of that guidance is based on preparing new RSSs or full reviews. The difficulties of dealing with alterations cover not just the EiP stage but the whole process, eg. Scoping, SA, consultation. The objective of speeding up planning assumes that there will be partial reviews. The process however is the same for a partial review as it is for an EiP into a new RSS. However plans are increasingly integrated so making it difficult to carry out partial reviews or alterations. (These issues are as relevant for DPDs as for RSSs.) The difficulty is essentially in the nature of the beast, however there are improvements that could be made to help clarify the situation.



## Scoping

1. We approached this through identifying a select list of issues that needed reviewing. Some of these were mayoral priorities: climate change and revision to the sub regional boundaries. Others were updates, such as the Olympics and Paralympics. Others were the result of changes to government policy and others were responses to clarify or refine policy, eg suburbs, density matrix. **The Statement of Intent helped identify what we wanted to change and to justify it. This was an essential stage in the process to consult informally on the scope of changes and then refine the scope.**

## Sustainability Appraisal

1. The Sustainability Appraisal process was difficult as it also was assessing only the proposed alterations but there were no clear lines between the extant plan and the FALP. **Further guidance on carrying out SAs into alterations is needed.** This might take the form of a discussion between the LPA and the Appraisal drafters to identify any key areas of the Plan that were not proposed to be altered but where there were clearly identifiable reasons as to why there may be implications for 'knock on' changes. These could be highlighted and made available to the Panel to assist them in allowing, or not, debate on any unchanged areas.

## Examination in Public

1. The EiP into the FALP has distinguished between minor changes and substantive changes to policy. This distinction has allowed the Mayor to propose a range of textual changes that update the plan but do not change its policy direction significantly. These changes will be reviewed by the Panel but have not been the subject of examination. **This approach seems to us to be appropriate, proportionate and has saved inquiry time.**
2. Is further clarification needed to confirm that any alterations that have been objected to, but not considered at the EiP, will be covered in the Panel's report?

## Seminars

1. Seminars. These were generally felt to be effective in understanding the technical aspects and setting the context of the EiP and some of the evidence base. It has been noticeable that attendance by boroughs at the EiP has been low; this may be a positive reflection that they have been closely involved in the preparation of the research reports and many of their potential issues have been addressed through seminars and

stakeholder meetings. **A lesson for the GLA is the need for more engagement with the community and voluntary sector.** They seem to be the group most frustrated by the plan's implementation and lack of recognition of some of their issues. **As part of the seminars or even a part of the preliminary meeting, it might be instructive for the GLA or Regional Planning Body to set out the scope of the alterations and their justification to set the context. This might be through an update of the Scoping Report.**

### **Draft Matters, EiP and Panel Recommendations**

1. The GLA felt that the list of draft matters was in some cases too long and detailed. The consultation on the list resulted in the changes to the Blue Ribbon Network policies being added. The Panel probably could not avoid including this as a matter. They have to balance the substance of proposed alterations with the weight of consultation responses. Matter 5 was too long with too many participants. It created problems of timetable management. **Probably if more time had been allocated to the draft matters stage, some of the resulting problems could have been avoided. We have in mind the need to limit the number of questions to be considered on any one day and to ensure that questions are not duplicated – although the problem of legitimate overlap is acknowledged.**
2. The Panel have repeatedly clarified what their remit is. This has been more successful than the previous EiP where the Panel cast a wider net. This led to much time spent on interesting issues but ones of little relevance. **We feel that this Panel has been focussed and strategic in their approach, which has been appreciated.** Participants have tried to introduce issues outside the remit and this has required firm but sensitive direction from the chair. **The Supplementary Questions were useful in helping to clarify the demarcation points – but see above concerning duplication and length of sessions**
3. The panel report into the early alterations made three types of recommendations: those in relation to the early recommendations; those for the intended further alterations and other recommendations. We found this approach problematic as we were dealing with the early alterations and did not know to what extent we were constrained by the two other types. **We suggest that the Panel make recommendations on the proposed alterations; this is their remit. They can make comments on other matters but not frame these as recommendations. However it is helpful for the Panel to recommend what should be considered within the scope of the next set of alterations.**

## **Conclusion**

**We suggest DCLG, with ERN and PINS, should investigate the scope of reviews and alterations, possibly commission research, and publish further guidance. At the very least we suggest a workshop with DCLG, ERN and PINS and relevant GOs. The GLA, as a member of ERN, would be happy to participate.**

Debbie McMullen  
9 July 2007

Cover photograph: Aerial view of London by night  
Courtesy of NASA