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Dear Ken

Consultation on Sub-Regional Development Frameworks

I am writing to advise you of the comments of the London Assembly's Planning and Spatial Development Committee on your draft Sub-Regional Development Frameworks (SRDFs).

The Committee broadly welcomes the use of SRDFs as a means of applying the London Plan at a sub-regional level. The usefulness of the document will inevitably vary for different Boroughs, relative to the strategic planning resources already available to them.

The sub-regional partnerships and voluntary sector stakeholders have indicated that the SRDF process has been helpful and constructive, and consider that, in the main, the London Plan team has sought to engage and collaborate with them. Nevertheless, evidence submitted to the Committee suggests that in some respects the process of developing the SRDFs could have been improved, and there are lessons that should be learned from the experience (as highlighted below under the heading, 'The process of developing the SRDFs').

On another note, we would caution that the non-statutory status of the SRDFs must be properly reflected in their final form, and in the way they are utilised as planning documents. There is a risk of blurring the boundaries between elaborating on existing policy and extending the boundaries of policy without due process. Furthermore, at the same time as the production of SRDFs effectively extends the Mayor's influence downwards, Boroughs are being asked to raise their game by taking a more strategic approach to the planning process.

The SRDFs should be presented as broad guidance on implementing the London Plan, but they should not extend London Plan policy and they should not be used to micromanage the Borough planning process.

Our detailed comments on these matters are set out below.

The process of developing the SRDFs

At its meeting on 14 July 2005 the Planning and Spatial Development Committee received a presentation from representatives of the London Plan team on the processes relating to the development of the SRDFs, and also put questions to other people involved in the development of the SRDFs. A transcript can be found at <http://www.london.gov.uk/assembly/planning/index.jsp>. This discussion highlighted a number of issues which should be addressed before the SRDFs are finalised, and when future iterations of the documents are produced alongside a revised London Plan.

1. There was a general recognition that the boundaries of the sub-regions are not ideal. The Committee considers that a review of the boundaries, with the aim of creating an optimal structure for delivery, should be expedited.
2. It was noted that the sub-regional alliances and partnerships did not have the resources to take on the task of drafting the SRDFs, and this resulted in shifts between partnership and direction from the GLA over the period of producing the documents. Careful consideration needs to be given to the resourcing of the sub-regional groups to ensure that they are in a position to contribute fully to the next iteration of the SRDFs, following the review of the London Plan.
3. The ALG was concerned that contributions to the SRDFs from GLA group organisations had been a weakness of the process. It was noted that the transport contents of the SRDFs were relatively late in having real substance. The Committee emphasises the need to ensure that contributions from the Functional Bodies are timely and robust for the next iteration of the SRDFs.
4. It was acknowledged that at the start of the process of developing the SRDFs there was insufficient engagement with the voluntary sector. These links were subsequently improved. The Committee is anxious that early voluntary sector engagement should be applied across the GLA's planning work, particularly during the review of the London Plan next year and through LDFs.
5. While GLA officers were commended on their efforts to bring health and education dimensions to the documents, these were still identified as a relative weakness. It is important that these aspects are given prominence in the SRDFs and treated as integral parts of them, drawing on the findings of the integrated impact assessments that have been conducted.
6. The West London Alliance commented on the need to understand and examine the rationale for any substantial changes made to the SRDF for their area during the consultation, before its adoption by the Mayor. The Committee asks for an assurance that stakeholders will have the opportunity to review any changes to the SRDFs before their final publication.
7. Finally, disappointment was expressed that the development framework provided in the SRDFs did not seem to have influenced the recommendations of the Planning Decisions Unit in respect of a number of strategic applications. Environmentally valuable sites continue to be encroached on by development. Given that the Planning and Spatial Development Committee has been told the SRDFs are a material consideration, their guidelines and constraints should be properly taken into account in the process of deciding planning applications.

Content of the SRDFs

The Committee commissioned a review of the consistency of the SRDFs with each other and the London Plan. The full text of the report is attached to this letter. I urge that you consider its contents carefully before finally publishing the SRDFs, and as part of producing future iterations of the documents. The overall recommendations arising from the report are as follows, with more detail set out in the full report.

Consistency

1. Differences in approach to proposed actions should be resolved where not related to the particular characteristics of sub-regions.
2. Gaps should be filled wherever possible, eg possible land requirements for health and particularly the education sector.
3. Topics where actions are proposed without reference to any database should be substantiated, eg on housing mix.
4. Minor inconsistencies, eg in presentation of figure work, should be corrected.

Alignment

5. Qualification is needed on some statements within SRDF text to refer to best practice, rather than prescribing policy to be applied at the Borough level as if it were from the London Plan, eg biodiversity, waste and renewable energy.
6. Clarification is needed on what procedural route will be used to make updates or extensions to London Plan policy, eg revising guidance on the release of industrial land. Changes to the role of town centres within the network should be made through a statutory plan.

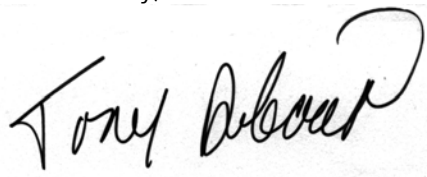
Value Added

7. Attempts should be made to make proposed actions as sub-regionally specific as possible (further work needed particularly on transport). This also applies to the strategic direction.
8. Presentational improvement could be made to Annex 5 to separate out issues for LDFs from those for the London Plan review.

Clarification of next stages

9. There is a need to ensure that finalisation process continues to receive sub-regional partnerships' support and does not introduce new elements that are more appropriately dealt with at Borough level eg Areas for Tall Buildings, or extend London Plan policy, eg implications of the new Housing Capacity Study.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Tony Abbott', is written over a light blue rectangular background.

Chairman of the Committee

Cc: Debbie McMullen, John Lett (GLA London Plan Team)