

Mayor's consultation on the London Plan - London Assembly Planning and Housing Committee Response

1 Introduction

- 1.1 On 29 April 2009 the Mayor published his proposals to revise the London Plan for initial consultation with the London Assembly.
- 1.2 The London Plan – the Spatial Development Strategy – is perhaps the most important policy document that the Mayor is required to produce. It sets out an economic, environmental, transport and social framework for the development of London over the next 20-25 years. It is an over-arching document that picks up on the “places and spaces” aspects of all the other Mayoral strategies, and provides the strategic, London-wide context within which boroughs must set their planning policies.
- 1.3 The Mayor published “Planning for a Better London” in July 2008 that set out the Mayor's approach to planning issues, and explained the key areas he wanted to address in revising the London Plan.
- 1.4 The Committee notes that the overall content and policy emphasis of this document logically follows the direction set by the Mayor's election manifesto commitments – for example greater emphasis on the quality of life for Londoners, more detailed policies for Inner and Outer London, a broader based economy, protection for green and open spaces, and protection for heritage. It also signalled a more consensual and less directive approach.

2 Background

- 2.1 The Assembly's response to the Mayor's consultation is based on a number of meetings of the Planning and Housing Committee over the previous 8 months. These include
 - A meeting with Sir Simon Milton, London Plan Team and invited experts (9 June 2009)
 - Informal meeting with invited experts to discuss the London Plan proposals (7 May 2009)
 - Meeting with the Chair of the Outer London Commission (28 April 2009)
 - Meeting on London's suburbs (17 March 2009)
 - Meetings on housing strategy related issues (October, December 2008)
- 2.2 These meetings covered various issues relating to the development of Mayoral strategies and aspects of the London Plan. Relevant themes in the past year that relate to the current London Plan review included housing issues, the state of suburban London and policy proposals for using section 106 to fund Crossrail.

3 Current stage of the London Plan review

- 3.1 The Committee welcomes the opportunity to comment on the Mayor's proposals at this stage of the development of the London Plan and notes that this consultation period ends on 30 June 2009 after which a further version of the Plan will be sent out for public consultation in September/October 2009.
- 3.2 The Committee intends to contribute to the various stages of the subsequent review process up to the Examination in Public in the summer of 2010 as policy proposals are developed in more detail.
- 3.3 The Committee notes that this is intended to be a complete replacement of the existing London Plan. It appreciates that this version of the London Plan is not a draft plan but a summary document of policy directions and the level of detail in this document is comparable to the level of detail that was produced by the previous administration when consulting on the comparable stage of the London Plan development in May 2001.
- 3.4 The Committee therefore does not wish to address each of the 190 policy proposals or the 21 questions posed in the consultation. It will however take the opportunity to make specific and more detailed comments on the policies in the London Plan as they develop.
- 3.5 The Committee believes it has engaged positively and productively with the Mayor when he consults the Assembly on detailed policies to achieve his stated objectives (such as meeting his affordable housing targets and securing section 106 funding for Crossrail) and it looks forward to contributing to the London Plan revision as and when more policies are developed.
- 3.6 Until those detailed policies are available this response will focus on some of the high level strategic issues that underpin the Plan's basic assumptions and a number of policy proposals that have been examined so far during the Committee's work.
- 3.7 The Committee was told that this is the only opportunity that the Assembly and GLA functional bodies will have to respond to the "Initial Proposals" before it goes to public consultation. It is of some concern to the Committee that the lack of detail prevents any real scrutiny and to an extent denies the Assembly the opportunity to comment on draft policies ahead of the public consultation.

4 Mayor's approach, vision and objectives

- 4.1 The Committee notes the Mayor's intention to make the new Plan shorter, more strategic and user-friendly, arranged in more topic-based chapters that should make finding policies on particular issues easier to find. It also notes the intention to provide a stronger spatial emphasis for the Plan.
- 4.2 The Committee recognises the complexity of developing a spatial development strategy for London, and the challenges of reconciling a wide range of often competing priorities. The Mayor must ensure that the next iteration of the plan is

sufficiently detailed and show how his priorities are addressed to avoid any lack of clarity.

- 4.3 The Committee welcomes the Mayor's approach [as set out in 4.1 above] but would wish to see that the benefits of the existing document in terms of dealing with the complex inter-relationships of the cross cutting themes is not lost. The Mayor should ensure that the policies that contribute to all six objectives of his plan are identified and that they are dealt with and co-ordinated across all topic based chapters. This should include cross-referencing where appropriate and should indicate more clearly how the plan brings together and integrates the following strategies: housing, transport, economic development, climate change mitigation and energy, and climate change adaptation, among others.
- 4.4 The Committee welcomes the strong steer the Mayor gives in his foreword as to what his vision might be:
- "We have sought to place environmental sustainability at the heart of our approach because job security, energy security and climate security are all interlinked and must inform our policies on housing, transport and quality of life" (page 7)*
- 4.5 The Committee welcomes this statement that aligns sustainable growth with tackling climate change, integrating economic, social, and environmental priorities and giving a strong vision, which should be reflected in the objectives and the rest of the document.
- 4.6 Further to support for the Mayor's foreword, the Committee suggests that these underlying or cross cutting themes need to be more clearly identified and brought out in the plan itself. The Committee suggests the following themes should be also be reflected in the Mayor's objectives:
- Tackling/addressing climate change.
 - Managing London's population and economic growth sustainably.
 - Tackling poverty and inequality and promoting inclusion.
 - Ensuring a high and improved quality of life.
- 4.7 Overall the Committee welcomes the Mayor's intention for a more strategic approach to planning decisions and this is reflected in his desire not to intervene in local planning decisions unless it is to intervene effectively and where strictly necessary to promote his strategic planning goals.
- 4.8 But in order to ensure boroughs have the clear direction that a strategic plan should provide the Mayor needs to provide greater detail in the draft Plan in order to demonstrate how his vision will be delivered and how his expectations for the future development of London can be translated into local decisions by boroughs.

Mayor's vision and objectives

- 4.9 The Mayor's vision is to ensure that over the years to 2031, London excels among global cities – expanding opportunities for all its people and enterprises, achieving the highest environmental standards and quality of life and leading the world in its approach to tackling the urban challenges of the 21st century.

- 4.10 The Committee welcomes the Mayor's vision for London and his 6 associated objectives and notes that this provides a degree of continuity in terms of endorsing the existing Plan's emphasis on managing London's economic and demographic growth; protecting and enhancing London's world city role; addressing climate change and environmental quality.
- 4.11 In many respects the degree of continuity is appropriate for a strategic plan that shapes the long-term development of London. However, the Mayor's foreword recognises that London 'needs to set a new course for [its] development over the next twenty years'. The Mayor's new plan must show how it will achieve this and deliver a sustainable London where all of us living here now can meet our needs without compromising the ability of future generations to meet theirs; a London with fewer emissions, less waste, less poverty, and less inequality.
- 4.12 It is important that the Committee can see what proposals are developed that set out how the Mayor intends to move from the current situation to the realisation of his vision by 2031. The Committee suggests that the full draft Plan sets out the likely effects of the London Plan's policies up to 2031, and some of the changes it expects to see in London during this period.
- 4.13 The Committee therefore suggests that the Mayor make explicit in the public consultation version of the Plan the following:
- What needs to change in London?
 - Where will it change? and;
 - How will it change?
- 4.14 This vision is reflected in the Mayor's 6 objectives for London:
1. A city that meets the challenges of economic and population growth
 2. An internationally competitive and successful city with a strong and diverse economy - at the leading edge of innovation and research
 3. A city of diverse, strong, secure and accessible neighbourhoods and a high quality environment for individuals to enjoy, live together and thrive.
 4. A city that delights the eye
 5. A world leader in improving the environment locally and globally, taking the lead in tackling climate change, reducing pollution, developing a low carbon economy
 6. A city where it is easy, safe and convenient for everyone to access jobs, opportunities and facilities with an efficient and effective transport system
- 4.15 The Committee believes that the Mayor's objectives would be strengthened by amending objective 1 to read: "A city that meets the challenges of economic and population growth whilst maintaining and enhancing London's open space."
- 4.16 The Committee also notes the Mayor's duties on housing, health inequalities, and social development. As these are not specifically mentioned in the proposed objectives, the Committee suggests that the final plan should clearly show how they will be taken into account in any planning decisions taken by the Mayor.

Sustainability Appraisal

- 4.17 One criticism of previous Plan revisions was the absence of a sustainability appraisal and so the Committee welcomes the publication of the Integrated Impact Assessment (IIA) Scoping Report (May 2009) and that it is synchronous with the drafting of the London Plan is a positive step.
- 4.18 As this is will be the second London Plan the Committee would expect the IIA to include a progress report on how far the first Plan is achieving its objectives and targets.
- 4.19 Monitoring progress will be critical if things are not happening soon enough, particularly important when tackling climate change.
- 4.20 However the Committee notes that at this stage in the review process the underlying assumptions for growth are still being finalised and modelling work on different options to assess their impacts (principally environmental and transport impacts) is still underway. A final set of options and the results of the modelling work will be feed into the IIA process, which will then explore any wider sustainability impacts.
- 4.21 As part of this work the Committee suggests that the Mayor needs to consider the challenges that some of the emerging trends such as accelerating climate change, persistent poverty and inequality, the need to diversify London's economy to ensure resilience and the potential for reduced availability of funding for London's transport and social infrastructure, especially from Section 106 contributions, in the short, medium and longer term.

5 A Resilient Plan - Choices and contingencies

- 5.1 This draft of the Plan is underpinned by a set of projections that show:
- That the period up until 2031, London's population is likely to increase from 7.56 million to between 8.79 and 9.11 million.
 - There will be household growth of between 720,000 and 860,000 by 2031.
 - The total number of jobs in London could increase from 4.7 million in 2008 to 4.9 million by 2016 and 5.3 million by 2031.
- 5.2 However, projections from the past are not always the most reliable guide to the future and it is important that the Mayor commits himself to continuous monitoring of the underlying assumptions.
- 5.3 A resilient, sustainable economy, one that is underpinned by improved quality of life going forward, requires flourishing local economies and an economy that is more diversified both spatially and sectorally. London should be low carbon, with greater access to employment opportunities for people the Mayor himself describes as "those facing the greatest disadvantage"¹. The plan needs to show the stages of this journey over the next twenty years and how the spatial development of London will need to change.

¹ Mayor's Foreword, p.7

- 5.4 The fundamental basis of the original Plan, and the research that underpinned it, was developed almost 10 years ago. The Mayor's London Plan must take into account climate change, growing inequality, and the threats to London's economy that reliance on banking and finance services have shown. The Committee is concerned that the Mayor should demonstrate that he has taken into account the latest evidence to underpin his assumptions on economic growth and the challenges to the environment.
- 5.5 The Committee received an assurance that there is a comprehensive and ongoing research programme to support the evidence base for the overall population and economic projections and that work was progressing on the implications of those for demand for transport infrastructure and associated investment, and the impact of economic trends on the demand for floor space and what is happening to London's town centres. The Committee would welcome the opportunity to examine this research programme and looks forward to the Mayor giving it access to the data.
- 5.6 The research programme needs to be communicated as widely as possible and must be a part of the sustainability appraisal so that potential options/scenarios can be tested prior to more detailed policies being developed and consulted on publicly.

6 London's Places

- 6.1 This Chapter brings together the policies that on the broad development strategy and the sub-regions, central activities zone and growth areas of London. It also incorporates the more spatially-specific aspects of town centres, offices and industrial locations and the open and natural environment.
- 6.2 The initial proposals document refers to the work being undertaken by the Outer London Commission to consider whether Outer London has the capacity to accommodate more economic growth. The Commission is due to report to the Mayor in July and the Mayor will consider which of its recommendations will be incorporated into the London Plan.
- 6.3 The Committee strongly supports the concept of a polycentric London. A long standing criticism of the current London Plan is that despite enabling Croydon and planning for two growth hubs, Brent Cross/Cricklewood and Stratford, and identifying opportunity areas, it is excessively primarily focussed on promoting employment growth in Central London, leaving Outer London in the short term to serve the role of providing homes to workers who must travel to jobs in the centre. The Committee welcomes the Mayor's intention to give a stronger policy focus and support for Outer London and emphasises that it must concentrate on developing local economies.
- 6.4 The Committee notes the early proposals of the Outer London Commission to promote a series of "super growth hubs" over and above those that currently exist or are planned for. Whilst growth hubs are certainly appropriate for some areas, especially Croydon, this model may not universally apply across London. The

Mayor should ensure that any proposals for new growth hubs take account of the local economic context and the potential effect on neighbouring town centres.

- 6.5 In addition to growth hubs the Mayor may wish to consider options such as growth corridors:
- Linking central London through outer parts of the capital to growth zones in the wider south east, to revive Outer London through its centres and other development nodes, located on or linked to key rail investment corridors
 - Designate growth poles in growth corridors Instead of three or four super-hubs, with improved transport investment to support development
 - Outer London growth needs to be considered in the light of the links to the rest of the South East beyond London. These economic links all require improvements in connectivity and the Mayor may wish to consider a concept of “super growth corridors” rather than super hubs, but links with the rest of the South East will need machinery and resources to make them effective.
- 6.6 Suburbs need new economic drivers to increase their sustainability and for them to become more self-sufficient centres, which make a greater contribution to the polycentric London region.
- 6.7 Maintaining and enhancing a range of employment uses in suburban areas is important to support sustainable communities. As employment uses become increasingly compatible with residential environments, there may be growing opportunities for local employment activities, including home-working and live/work spaces.
- 6.8 Many of the economic sectors in which London currently excels in are, and will continue to be, located in central London because of the tendency to agglomerate. Policies to improve the economic environment in Outer London should be focused on businesses that do not naturally agglomerate. These could include, for example, urban agriculture and street markets.
- 6.9 The Mayor should set out in his London Plan what support the planning system could give to boroughs to promote new ways of working, including exploiting information and communications technology, in a way that makes suburban areas and town centres more appropriate places to work from.
- 6.10 In adding the spatial dimension to the London Plan, in terms of where growth takes place there must be linkages between transport investment and development policies. The Mayor needs to decide how growth should be informed by decisions on the availability of funding for transport or social infrastructure. This does not mean that investment is predicated on existing need but that place making, especially new housing developments, need infrastructure investment to make them viable.
- 6.11 The London Plan should do more to minimise the additional travel demand that new homes and jobs will generate and this means that ways of encouraging job growth where people live will be important. The Mayor should make greater use of land use policy as a travel demand management tool as polycentric patterns of

development offer more opportunities for much shorter trips that could be made by cycling or on foot.

- 6.12 The use of planning policy to help manage travel demand should include consideration of what modal shift from private car journeys to more sustainable alternatives will be needed in order to meet the Mayor's objective of tackling climate change and reducing pollution.
- 6.13 Outer London town centres need to act as radial transport hubs so that commuters can travel in and out from the surrounding suburbs. However, to support sustainable economic development the Mayor must also encourage greater investment in Outer London transport improvements, particularly orbital links wherever this is financially possible.

7 London's People

- 7.1 The Committee has already made its comments to the Mayor on his proposals contained in his housing strategy. In his response the Mayor accepted some of the Committee's recommendations but declined to revise his strategy for others.
- 7.2 The Mayor is working with boroughs and other partners on a Strategic Housing Land Availability Assessment (SHLAA). This will provide a key part of the evidence base for new housing targets for London on a collaborative basis with boroughs. The results of the SHLAA will be published in Autumn 2009. The Committee will comment when this is available and implications are known.
- 7.3 The Committee recognises that some estate renewal schemes will inevitably be at lower densities in order to accommodate larger affordable housing and this will mean net losses on individual schemes. However, overall the Mayor should encourage the net addition to London's affordable housing stock.
- 7.4 The Committee notes the Mayor's intention to develop local housing targets collaboratively with boroughs. However, if boroughs fail to agree affordable housing targets, the Mayor will need to outline what steps he will take to ensure his targets for the strategic supply of affordable housing in London can be met.
- 7.5 The Committee supports the Mayor's intention that the new London Plan should strongly promote high quality urban environments contributing to a high and improving quality of life. The Plan must make clear the expectation that the highest design and quality standards will guide all new developments and this should reflect the highest possible standards –of design, internal space standards/room size, play and recreation space, energy efficiency or water conservation.
- 7.6 The Committee welcomes the Mayor's intention to "optimise" rather than "maximise" housing density, and looks forward to seeing how this will be put into practice. However, any optimisation should also take into account the need for new homes in London that do not encroach on open space.

- 7.7 The Mayor's final Housing Design Guide must set out the essential requirements for all new build housing that contains affordable units or has public sector funding.
- 7.8 The Committee also recommends that the Plan allows Local Authorities to respond in a way that is sensitive to the local context in terms of the size mix and densities of new housing developments. The Mayor should also work towards improving space standards in the private sector to establish a 'level playing-field' across tenures and to tackle the identified poor space standards that have characterised new homes in London.
- 7.9 The Committee awaits the Mayor's detailed proposals for looking at new ways of delivering services, unlocking new resources, better aligning public sector investment programmes and making existing resources work more effectively.
- 7.10 The Mayor needs to emphasise the importance of planning for social infrastructure, so that it supports London's growth and regeneration.

8 London's Economy

- 8.1 The key objective of Chapter Four – London's Economy is to ensure that London meets the challenges of economic and population growth and is an internationally competitive and successful city, and to provide the planning basis for the continued growth and economic development of all parts of London.
- 8.2 It is expected that the Economic Development, Culture, Sport and Tourism Committee will be making contributions to the Mayor's economic development strategy as is developed over time.
- 8.3 The Committee strongly supports the Mayor's intention that the Plan should provide a planning basis for managing growth and economic development of all parts of London. It especially welcomes the recognition that London's economy needs to diversify away from a reliance on financial services to one that provides support for sectors such as the universities, medical services and research, science, the creative and cultural industries.
- 8.4 The land/workspace requirements of manufacturing, accommodating existing sectors like logistics and the growing "services for the service sector", sites for essential services such as waste, and making provision for emerging essential new sectors such as green industries must be safeguarded. This should be a priority; in particular land is absolutely necessary for the jobs growth predicted in climate change related industries and must be protected for this.
- 8.5 The Committee has already commented on the need to encourage employment sectors in Outer London that do not need to agglomerate to thrive (paragraph 6.8 above). As part of the move to diversify London's economy the Plan should encourage the development of these types of companies and sectors across London.
- 8.6 In terms of Strategic Industrial Locations the Committee welcomes the intention to take a more rigorous approach to the release of industrial land but the detail

will be in how this will be achieved. This is important because, along with the support of the LDA in encouraging the development of a Green Enterprise Zone in the Thames Gateway it will be absolutely vital the Plan anticipates the inevitable growth and related land requirements needed to foster green industries in London in the future and guarantees there are adequate sites and the potential for this growth. These will be the industries of the 21st century.

- 8.7 Similarly the Committee welcomes policy proposals that focus on the needs of small and medium-sized enterprises, particularly those that ensure availability of affordable work space. The Committee also welcomes support for local street markets.
- 8.8 The Committee recommends a specific reference in the London Plan to local shops and the value of local shopping parades. There should be a general presumption against loss of these without replacement. The Committee also recommends a specific reference to the value of local pubs.
- 8.9 The London Plan should also support local authorities, if they so choose, to make planning judgements based on the local economy, in addition to the wider London economy

9 London's Response To Climate Change

- 9.1 The key objective of Chapter Five – London's Response to Climate Change is to ensure that London is a city that becomes a world leader in improving the environment and to use the London Plan to ensure that the planning system makes the fullest contribution to the mitigation of and adaptation to climate change.
- 9.2 It is expected that the Environment Committee will be making contributions to the Mayor's environment, climate change adaptation and mitigation strategies as they are developed over time.
- 9.3 The Plan proposes policies that:
 - Promote a balanced approach to encouraging sustainable energy in new development
 - Develop a pragmatic approach to stimulating the uptake of renewable energy
 - Strengthen the policy approach to energy efficiency and conservation in the design of new buildings
 - Strengthen the policy approach to promote area based heating and cooling networks
 - Manage as much of London's waste within London as practicable
 - Adopt a more flexible approach to waste self-sufficiency so that the carbon outcome of the treatment method and transportation are given greater consideration.
 - Move towards fewer, larger waste sites

- Support a comprehensive infrastructure for electric vehicles across London, especially charging points.
- 9.4 The Mayor will also set challenging CO2 reduction targets to achieve a 60 per cent reduction in emissions below 1990 levels by 2025.
 - 9.5 The Committee strongly supports the comprehensive attention and importance given to considering climate change adaptation and mitigation that the policy directions infer. However, these policy directions are in advance of the publication of the Mayor's Climate Change Mitigation and Energy Strategy, which makes it hard to assess their contribution to meeting the Mayor's 60 per cent CO2 reduction target by 2025.
 - 9.6 Further drafts of the London Plan need to show how each London plan policy or group of policies will contribute to delivering a 60 per cent reduction in CO2 by 2025.
 - 9.7 The Committee also understands that the Mayor is keen to avoid a directive or prescriptive approach to aspects such as renewables where technology is advancing rapidly and innovation should not be stifled.
 - 9.8 The Committee understands this concern and, in order that the Plan reflects the Mayor's vision for London to become a world leader in improving the environment the Mayor must ensure that the London Plan policies are explicit and do not allow room to accept sub standard developments, practices or technology in London's response to Climate Change.
 - 9.9 There are a number of specific issues that need to be covered in further revisions of the Plan. In addition to some large waste sites there need to be neighbourhood sites in order to take some of the new technologies (gasification, anaerobic digestion etc) producing renewable gas.
 - 9.10 A neighbourhood approach to local energy generation systems, renewables and CCHP units should be detailed in further revisions of the Plan.
 - 9.11 Safeguarding wharves should be detailed in further revisions of the Plan. Allowing development on wharves fosters 'hope value'. These are low value sites and their river related uses (reprocessing aggregates, recycling industries, paper mills etc) must be safeguarded and promoted, in the interests of sustainable transport and tackling climate change, as once lost to development they can never be replaced.
 - 9.12 The Committee will return to the Mayor's policies on Climate Change when more details have been developed in later versions of the Plan.

10 London's Transport

- 10.1 The key objective of the transport proposals in the London Plan is to create "A city where it is easy, safe and convenient for everyone to access jobs, opportunities and facilities with an efficient and effective transport system, which places more emphasis on walking and cycling and making better use of the Thames, and supporting delivery of all the objectives of this Plan."

- 10.2 It is expected that the Transport Committee will be making contributions to the Mayor's transport strategy as is developed over time.
- 10.3 Many other of the Committee's transport related comments are detailed in the section on Chapter Two – London's Places above.
- 10.4 The projected increase in housing, population and employment will create significant challenges for London's transport system that is already at or nearing capacity in some areas, particularly during the peak periods.
- 10.5 The Plan will need to identify where planned growth in jobs and population will require work to be done to anticipate improvements needed in the public transport system to sustainably cope with development.
- 10.6 The Mayor has taken the decision to remove major transport proposals from the TfL Business Plan due to lack of available funding.
- 10.7 The Committee understands the Mayor's rationale as it applies to the shorter term Transport Strategy, however the London Plan is intended to deal with a far longer time period than other strategies such as housing, economic development and transport.
- 10.8 Therefore, mindful of the role of transport in accommodating sustainable growth, the Committee would encourage the Mayor to indicate where new transport schemes may be necessary in the long term, subject to changing circumstances.

11 London's Quality Of Life

- 11.1 The key objective of Chapter Seven – London's Quality of Life contribute to meeting the objectives that ensure London is: an internationally competitive and successful world city; a city of diverse, strong, secure and accessible neighbourhoods; a city that becomes a world leader in improving the environment and a "city that delights the eye".
- 11.2 It brings together policies currently covered by "Enjoying London", "Designs on London" and "The Blue Ribbon Network".
- 11.3 The Committee strongly welcomes policy proposals that will:
- Protect, promote and improve access to the network of open spaces, strengthening the promotion of urban greening and urban agriculture.
 - Extend green grid principles from East London to a London wide project and provide the basis for supplementary guidance as a mechanism for developing implementation priorities in sub regional partnerships.
 - Strengthen protection of local open spaces, including playing fields.
 - Set out policies to protect street trees and secure tree planting in new development.

- Consider developing minimum standards for large emitters of pollution, such as biomass plants and large Combined Heat and Power plants.
- Give a presumption against development in back gardens.
- Strengthen London's protection against flooding.

11.4 The Committee would ask the Mayor consider the findings and recommendations of forthcoming Committee work on the planning policy implications of commercial agriculture and the protection and enhancement of London's war memorials as they are published in future versions of the London Plan.

11.5 The Committee welcomes the Mayor's intention to support tall buildings only in locations where they are appropriate.