



Response to draft London Plan

2 March 2018

Centre for London is an independent think tank and charity, formally established in 2012. Through our research and events we aim to make London a fair and prosperous global city.

Overall, we endorse the vision and ambition for ‘Good Growth’ set out in the new draft London Plan. London needs to tackle its housing crisis urgently: housing costs, driven at least in part by slow housing delivery, hamper both fairness and prosperity. But alongside more affordable housing, the city also needs to provide workplaces for a fast-changing economy, a safe and well-designed public realm, and an efficient and green transport system.

[With development in the Green Belt ruled out by the Mayor, London must design higher density developments integrated with public transport, using small and large sites across the capital.](#)

The comments below on specific policies primarily draw on the findings and recommendations of independent reports generally researched and written by Centre for London staff. In the case of the final report from the independent commission on London’s roads and streets, the report represents the findings of a commission of experts, chaired by Sir Malcolm Grant.

1. Planning London’s future

We endorse the policies set out in this section of the draft London Plan, and in particular the proposals set out under policies GG1 and GG2 (building strong and inclusive communities, and making best use of land):

- *Making Good* and *Growing Well* have made the case for the value of inclusive, designed placemaking, and bold political leadership, in meeting a vision for good growth.
- [Ideas above your Station: Exploring the potential for development at London’s stations \(2017\)](#) made the case for better use of land above and around railway stations in London, optimise densities, create better places and potentially cross-subsidise infrastructure improvements. In particular it argued that “the Greater London Authority (GLA) and Transport for London (TfL), with Network Rail, should prioritise work to identify public land ownership around stations (particularly those expected to receive or require major investment in the near future), building on the work of the London Land Commission”.
- [STOPPED: Why people oppose new developments in their backyards \(2016\)](#) analysed the reasons why people oppose new residential development, and recommended a number of measures to enable community support, including through the use of neighbourhood planning, which is not addressed in the draft London Plan.

- [*Going large – making the most of London’s big sites*](#) (2016) argued for better use of public sector land and opportunity areas, and a more active commitment to design-led masterplanning and joint ventures, as opposed to simple land disposals.
- [*Street Smarts: Report of the commission on the future of London’s roads & streets*](#) recommended a package of measures to prioritise more efficient and sustainable transport modes.

2. Spatial development patterns

Policy SD1 Opportunity areas

[*Going large – making the most of London’s big sites*](#) made a number of recommendations for opportunity areas, arguing that the Mayor of London should:

- “Seek integration between transport and major development opportunities, by actively planning the best possible transport infrastructure for existing opportunity areas, and identifying new opportunity areas along new transport corridors.”
- “Consider establishing a new arm’s-length agency with world-class leadership to help local authorities and other partners with major development opportunities.”
- “Establish joint ventures with local partners for priority sites, using mayoral development corporation or other powers to intervene where progress is slow or delivery structures seem insufficient for the task.”
- “Explore whether new models of development corporation might enable accelerated planning processes without displacing existing partnership arrangements.”

[*Ideas above your Station: Exploring the potential for development at London’s stations*](#) (2017) also argued for active measures to optimise housing-infrastructure links in opportunity areas:

- “The GLA should ensure that TfL and Network Rail’s plans for upgrades and improvements are incorporated into long-term planning tools such as the London Infrastructure Map, as well as plans for opportunity areas and intensification areas, so that opportunities can be anticipated, planned for and co-ordinated.”

Policy SD2 Collaboration in the Wider South East.

Our report [*Next Door Neighbours: Collaborative working across the London boundary*](#) addressed this issue and supported intensified joint working. We endorse the ambition of this policy, but draw attention to two specific recommendations in our report:

- “London and its neighbouring regions should develop a vision for the future, a shared understanding of the challenges they face in sustainably accommodating growth, and a strategy for joint action, using the London Plan consultation process to frame this understanding. This should guide a more integrated approach to meeting the housing, infrastructure and economic investment needs of the area.”
- “The WSE Group, along with other key stakeholders such as LEPs and other partnerships, should explore how best they can strengthen the Wider South East strategic partnership as a forum for dialogue and a vehicle for articulating shared interests and a shared vision. They should consider, inter alia, the geographic scope of that partnership, its membership, and arrangements for its governance.”

3. Design

Policy D1 London's form and characteristics

We endorse this policy.

- Our essay collection *Making Good* highlighted the importance of respecting local character.
- [Street Smarts: Report of the commission on the future of London's roads & streets](#) (2017) addressed the value of intelligent street design to establish a road space hierarchy and promote active travel:

Policy D7 Public realm

[Street Smarts: Report of the commission on the future of London's roads & streets](#) (2017) argues for kerb space hierarchies to avoid excessive car parking and enable easy access for pedestrians:

- “TfL and the boroughs should agree new kerb space hierarchies to govern parking and kerb space allocation and undertake regular local reviews.”

4. Housing

Policy H1 Increasing housing supply

We are currently undertaking research into the role of borough housing companies and innovative construction methods in increasing housing supply. These projects will report over the summer.

Policy H2 Small sites

We endorse the proposal to focus on opportunities in high PTAL areas and/or within 800m of rail or underground stations. [Ideas above your Station: Exploring the potential for development at London's stations](#) (2017) proposes a number of measures to ensure that such opportunities are optimised:

- “The GLA should define “station intensification areas” in the London Plan as a strategic priority around key stations, setting higher minimum density and design standards in these areas, and (if necessary) using call-in powers to ensure approval of policy-compliant schemes.”
- “The GLA should explore establishing Mayoral Development Corporations or specific project development vehicles to provide the resources, expertise, and certainty required to make the most of station development opportunities when new rail schemes are being developed – particularly where multiple stakeholder interests are not yet aligned.”

Policy H5 Delivering affordable housing

We support the aim of significantly increasing affordable housing levels in London, and the ambitious targets proposed, though [Ideas above your Station: Exploring the potential for development at London's stations](#) (2017) does argue that flexibility needs to be shown where schemes are also delivering significant transport infrastructure improvements.

- “The Mayor, the GLA and the London boroughs should adopt a tailored approach to affordable housing in over-station developments in order to reflect the value of station improvements; they should also encourage the use of review mechanisms to ensure viability and share value uplifts.”

However, as set out in our report [Strength in Numbers : Funding and Building More Affordable Housing in London](#) (2017) we do not believe that on-site provision is always the best option. We appreciate the value of mixed communities, but believe this needs to be balanced against London-wide considerations, including the potential to build significantly more homes and enhancing social mix at the same cost in outer London (where there are fewer affordable homes to start with). Our report recommends a collaborative approach across London, facilitated by the Mayor:

- “The GLA should help broker formal borough partnerships in housing delivery, and use its policies, powers and resources, including publishing a best practice guide, to facilitate and encourage collaboration.”
- “The GLA should incentivise collaborative affordable housing delivery through more flexible or enhanced levels of grant for consortia of local authorities, together with housing associations and private developers. The Mayor and London boroughs should also develop a more strategic London-wide approach to building new affordable housing, embedded in the London Plan.”

Policy H10 Redevelopment of existing housing and estate regeneration

We endorse this policy. Our report *Another Storey*: argued that loss of existing housing (privately as well as publicly owned) was justifiable to achieve densification, though the capacity for estate densification was perhaps lower than predicted – we estimated a potential to add between 4,000 and 8,000 homes a year – and would need subsidy in many cases. We also argued that estate densification should be supported by extensive community engagement (supported by transparent information on costs and benefits), and made the case for higher home-loss payments for tenants.

6. Economy

Policy E8 Sector growth opportunities and clusters

We support this policy’s focus on the diversity of London’s economic prospects, and in particular the recognition of the importance of innovation districts and higher education clusters as drivers of growth. Our 2016 [Spaces to Think](#) report also recommended investment strategies that focused on place as well as sector, and highlighted the value that innovation districts could play in secondary locations:

- “The London Plan, and its accompanying strategies, should go further in recognising the role of innovation districts, both in democratising innovation and boosting growth in secondary areas.”
- “The London Plan should recognise the role played by innovation districts, especially in secondary areas, and incorporate the innovation district model into the London Plan, ensuring that universities and knowledge economy institutions are included in London’s spatial strategy.”
- “The Mayor should encourage district-based inward investment strategies as well as sector-focused strategies.”

10. Transport

Policy T1 Strategic approach to transport

We endorse this approach to making the most effective use of land, in line with *Ideas above your Station*, which recommended:

- “The Greater London Authority (GLA) and Transport for London (TfL), with Network Rail, should prioritise work to identify public land ownership around stations (particularly those expected to receive or require major investment in the near future), building on the work of the London Land Commission.”

Policy T2 Healthy Streets

We endorse this approach. *Street Smarts* argued for concerted action to promote active travel modes and healthy streets, including continuing re-allocation of road space:

- “TfL and the boroughs should continue to reallocate space in line with a clear road space hierarchy, using intelligent street design to prioritise the most efficient and appropriate modes by providing a combination of: adequate pedestrian space, new segregated cycling lanes and Quietways, priority bus lanes and rapid bus transit services, and consideration of where emerging shared mobility services sit in this hierarchy.”

Policy T3 Transport capacity, connectivity and safeguarding

We support this policy, and a long term approach to planning transport capacity, but we also recommend that further measures are taken to integrate transport and development. In *Ideas above your Station*, we recommended that:

- “The Mayor, the GLA, and other scheme promoters such as HS2, should ensure that new stations include provision for over- and/or around station development, as recommended by the National Infrastructure Commission.”

Policy T5 Cycle parking

We support the reallocation of kerb space for cycle parking, in line with *Street Smarts*.

- “Using the kerb space hierarchies, boroughs should develop a robust cycle parking strategy including the reallocation of kerb space to cycle parking. TfL must ensure that the cycle parking strategy is a condition of eligibility for boroughs’ LIP funding and actively monitor delivery.”

Policy T6.1 Car parking

We support maximum standards for residential car parking, and in *Street Smarts* recommended that these be complemented by a package of measure to reduce car parking, and incentives to encourage people to give up parking spaces:

- “Boroughs should adopt residential parking policies as part of their Traffic Reduction Plans. These should include a charging regime that limits residential parking permits at sustainable levels; limits on the number of permits per household, with escalating charges for additional and more polluting vehicles; removing automatic parking permit rights when properties are sold; incentives that encourage households to give up their

parking permits, such as Oyster card credit, discounted car club memberships or credits for mobility services; minimal residential parking provision on new developments.”

Street Smarts also recommended more dynamic charging regimes for non-residential short-stay parking, to optimise occupancy and reduce the impact of cars looking for parking spaces, and the roll-out of intelligent charging infrastructure:

- “Boroughs should consider introducing variable charges for non-residential short-stay parking with the aim of achieving 85-90 per cent occupancy.”
- “London’s traffic authorities should plan for the rollout of intelligent vehicle charging infrastructure as part of their kerb space strategies, and should develop financial mechanisms to spread grid infrastructure costs fairly across each additional charging point.”

Policy T7 Freight and servicing

We endorse the overall approach set out in this policy. *Street Smarts* made specific recommendations in relation to using spaces like car parks for micro-consolidation, and establishing zero-emission delivery zones:

- “Boroughs should encourage off-site consolidation by utilising assets such as underused car parks to provide micro-consolidation and last-mile delivery capacity for SMEs, establishing zero-emission delivery zones around certain business districts, and leading by example by consolidating procurement practices. BIDs and business estates should also coordinate on and off-site consolidation.