

Behind the London Plan

The response of the London Assembly to the Mayor's draft London Plan
November 2002



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**Greater London Authority
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Chair's foreword



This report contains the London Assembly's Planning and Spatial Development Committee's response to the Mayor's draft London Plan.

Our response consists of 28 formal representations: five representations supporting, nine representations expressing conditional support for, and 14 representations objecting to particular aspects of the Plan; and a letter to the Mayor from Trevor Phillips, Chair of the London Assembly, and myself as Chair of the Assembly's Planning and Spatial Development Committee. These were submitted to the Mayor on 27 September 2002.

Our representations on the draft London Plan build on the recommendations of the scrutiny investigation conducted last year into Towards the London Plan, the Mayor's initial proposals for the spatial development strategy¹. We took evidence from the Mayor, the Association of London Government and the London Development Agency at meetings of the Planning and Spatial Development Committee, and received comments from other Assembly committees – Transport, Environment, and Economic and Social Development.

We have decided to publish this material in report format because we wish to continue our contribution to the ongoing public debate about London's future development. Our letter to the Mayor summarises the main themes detailed in our representations.

We reiterate our strong support for the Mayor's vision of London as an exemplary sustainable world city, and we welcome the many instances where the Mayor has moved in response to some of our earlier recommendations. We really want the London Plan to work.

However, as when we scrutinised Towards the London Plan, we find ourselves expressing concern as to whether London's predicted growth can be accommodated in a sustainable way. Will Londoners get the skills they need, will there be enough new homes, is the Plan directing new jobs to the right locations, and will London's transport system be able to cope with the scale of growth that the Mayor envisages?

We believe that in order to deal with these issues we have to delve behind the London Plan and look at the assumptions which underlie the Mayor's policy choices for the capital's future. We look forward to the Examination in Public next year at which we trust the answers to these fundamental questions will emerge.

A handwritten signature in black ink, appearing to read 'Bob Neill', written in a cursive style.

Bob Neill
Chair of the Planning and Spatial Development Committee

¹ Scrutiny of Towards the London Plan, London Assembly Spatial Development Investigative Committee, January 2002

The Planning and Spatial Development Committee

The Planning and Spatial Development Committee was established on 8 May 2002 as part of a major reorganisation by the Assembly of its committee structure. This new committee carries forward the responsibilities and terms of reference of the former Planning Advisory Committee and the former SDS Investigative Committee, together with the planning responsibilities of the former Transport Policy and Spatial Development Policy Committee.

The membership of the Committee is as follows:

Bob Neill (Chair)	Conservative
Sally Hamwee (Deputy Chair)	Liberal Democrat
Tony Arbour	Conservative
Darren Johnson	Green
John Biggs	Labour
Val Shawcross	Labour

The terms of reference of the Committee are as follows:

1. To examine and report from time to time on
 - ## the strategies, policies and actions of the Mayor and the Functional Bodies
 - ## matters of importance to Greater Londonas they relate to spatial development and planning in London
2. To examine and report to and on behalf of the Assembly from time to time on the Mayor's Spatial Development Strategy, in particular its implementation and revision.
3. When invited by the Mayor, to contribute to his consideration of major planning applications.
4. To monitor the Mayor's exercise of his statutory powers in regard to major planning applications referred by the local planning authorities, and to report to the Assembly with any proposal for submission to the Mayor for the improvement of the process.
5. To review Unitary Development Plans (UDPs) submitted to the Mayor by the local planning authorities for consistency with his strategies overall, to prepare a response to the Mayor for consideration by the Assembly, and to monitor the Mayor's decision with regard to UDPs
6. To take into account in its deliberations the cross cutting themes of: the health of persons in Greater London; the achievement of sustainable development in the United Kingdom; and the promotion of opportunity.
7. To respond on behalf of the Assembly to consultations and similar processes when within its terms of reference.

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<http://www.london.gov.uk/approot/assembly/index.jsp>

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Spatial Development Committee

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Ken Livingstone

Mayor of London

(London Plan Consultation)

Greater London Authority

FREEPOST LON 15799

London SE1 2BR

our ref: DLP/P&SDcttee/RL

your ref:

date: 27 September 2002

Dear Ken

London Assembly representations on the Draft London Plan

We enclose the Assembly's formal representations in response to your public consultation on the Draft London Plan. They have been prepared by the Planning and Spatial Development Committee, and they incorporate the views of the Assembly's Transport, Environment and Economic and Social Development Committees.

We reiterate our strong support for your vision of London as an 'exemplary sustainable world city, based on the three balanced and interwoven themes of strong, long term and diverse economic growth, social inclusivity and fundamental improvements in the environment and use of resources'.

We acknowledge that you have responded positively to some of the criticisms we raised last year in our scrutiny of Towards the London Plan. The draft Plan has a better spatial feel, there is more logic to its structure, there is more on environmental sustainability and social responsibility, waste management and renewable energy. We support the Plan's key objective of transport and land use integration, and we welcome the provision of detailed information on the phasing of transport investment, employment growth and major development. We felt it was vital that you provided this level of detail so that you could manage successfully the Plan's delivery, and that we and others could measure and evaluate your performance, and we appreciate its provision.

This information has revealed, however, the Plan's high degree of sensitivity to and dependency on a small number of critical factors. Two such factors stand out in particular – the importance of giving Londoners the right skills to enable them to compete successfully for the large numbers of new jobs that you predict, and the requirement for planned public transport improvements to come on stream in time. When you came to give evidence to the Planning and Spatial Development Committee in July, we noted that you not only agreed with our views, but you said you were prepared to have your mayoralty judged on your ability to deliver enhanced skills and improved transport for London.

So it is of concern to us that on the issue of transport capacity, your Plan concedes that there are phasing concerns, and that even if the new schemes you anticipate were

delivered on time, there would still be insufficient capacity at some points in the network (draft London Plan, paragraph 2A.38). The inescapable conclusion from this frank admission is that over the period to 2016 public transport congestion in London will get progressively worse.

In our detailed representations we suggest there are two things you should do to forestall this. First, you and TfL should consider broadening the scope of your transport programme with additional intermediate mode transport links – more trams, for example – around outer London. Secondly, you need to look again at the way the Plan deals spatially with employment projections.

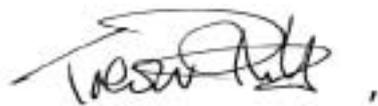
We believe the allocation of most of the projected growth in business services jobs to the centre and the east of London is questionable. It stems from your failure to distinguish between projected job growth in financial services and job growth in business services. We think that you have missed a major opportunity to redirect London's employment growth into a more sustainable pattern, spread throughout London and focused on the network of town centres. This would, in our view, give a more equitable distribution of employment opportunities for Londoners, reduce the pressure on the centre, and help to tackle congestion.

We fully accept that the financial services sector should continue to locate in the centre and the east, but we believe, with the Association of London Government, that rebalancing employment growth by directing a greater proportion of new jobs in business services towards the town centre network could be achieved without detriment to London's global position.

We believe you have arrived at this position – transport failing to cope with growth – because you continue to juggle with two conflicting ideologies. The Plan's response to employment growth is characteristic of the now discredited 'predict and provide' approach to planning. The rest of the Plan, however, closely follows the 'plan, monitor and manage' approach which we advocate.

We urge you to look again at the distribution of new jobs and the provision of transport links in the Plan, and accept the changes we propose. Only then will the Plan be able to deliver the sustainable improvements that London desperately needs.

Yours sincerely



Trevor Phillips
Chair of the London Assembly



Bob Neill
Chair of the Planning and
Spatial Development Committee

Schedule of formal representations on the draft London Plan from the London Assembly 27 September 2002	
1	The Mayor's vision <i>support</i> Introduction, paras 23-28, p 6
2	Wealth disparities <i>conditional support</i> Introduction, para 1A.4, p 15
3	Economic change and the finance and business services sector <i>object</i> Chapter 1, Section 2: Economic growth Future economic and employment change, paras 1A.27-1A.29, pp 23-27 The finance and business services sector, paras 1A.30-1A.32, pp 27-28
4	The environmental imperative <i>support</i> Chapter 1, Section 3, paras 1A.35-1A.37, pp 28-29
5	Social justice <i>conditional support</i> Chapter 1, Section 6, paras 1A.44-1A.54, pp 31-33
6	Alternative scenarios for London's future <i>support</i> Chapter 1, Section 7: paras 1A.55-1A.60, pp 34-36
7	Alternative scenarios for London's future <i>object</i> Chapter 1, Section 7: paras 1A.55-1A.60, pp 34-36
8	London's place in the world <i>conditional support</i> Chapter 1, Section 1B, paras 1B.1-1B.18, pp 38-43
9	Sub regional partnerships <i>conditional support</i> Chapter 2, Policy 2A.1 Sub-regional spatial frameworks, page 53 Chapter 5, Section 1, Policy 5.1: Working in partnership, page 262
10	Forecast sub-regional employment changes <i>object</i> Chapter 2, Economic growth, paras 2A.27-32, pp 55-56 Table 2A.3 Forecast sub-regional employment changes, 2001-2016, page 55
11	Transport accessibility <i>object</i> Chapter 2, paras 2A.33-2A.38, pp 56-58 Map 2A Access to public transport, page 56
12	Transport capacity <i>object</i> Chapter 2, paras 2A.32-2A.38, pp 56-58
13	The suburbs <i>conditional support</i> Chapter 2, paras 2A.53-2A.59, pp 65-67 Policies 2A.7-9, page 65
14	Increasing housing supply <i>object</i> Chapter 3, Section 1: Housing policies, paras 3A.6-3A.19, pp 112-117
15	Increasing the provision of affordable housing <i>conditional support</i> Chapter 3, Section 1: Housing policies, paras 3A.39-3A.50, pp 125-130
16	Improving skills and employment opportunities <i>object</i> Chapter 3, section 5, paras 3B.53-3B.60, pp 172-174 Policy 3B.13 Improving the skills and employment opportunities for Londoners, page 172
17	Closer integration of transport and spatial development <i>support</i> Chapter 3, Section 3C, Policy 3C.1: Integrating transport & development, Policy 3C.2: Matching development to transport capacity, page 176
18	Providing waste recycling facilities <i>conditional support</i> Chapter 4, Section 1: Planning for waste, paras 4A.6-4A.11, pp 224-229 Policy 4A.1, Policy 4A.2, Policy 4A.3, pp 224-226

19	Promoting renewable energy <i>conditional support</i> Chapter 4, Section 4: Improving the use of energy, paras 4A.22-27, pp 233-6 Policies 4A.7-10, pp 233-235
20	Sustainability Appraisal <i>object</i> Chapter 4, Section 4C: Reconciliation check, paras 4C.3 – 4C.6, page 255
21	Priorities in planning obligations <i>object</i> Chapter 5, Policy 5.3, page 270
22	A wider role for the Mayor in Planning obligations? <i>object</i> Chapter 5, Policy 5.3 and 5.4, paras 5.39-5.42, pp 270-71
23	Phasing of growth in jobs and population <i>object</i> Chapter 5, section 4: Managing change and measuring progress Table 5.1: Indicative phasing of growth in jobs and population, page 277
24	Timing of major transport schemes <i>conditional support</i> Chapter 5, Table 5.3, page 279
25	Measuring progress <i>support</i> Chapter 5, paras 5.74-5.76, pp 280-281 Policy 5.9 Measuring progress, page 280 Table 5.4 Key performance measures, pp 284-285
26	Supplementary planning guidance <i>object</i> References scattered throughout the Plan
27	Format of the draft London Plan <i>object</i>
28	SDS Technical Reports <i>object</i>

<p>London Assembly rep 1</p>	<p>Draft London Plan chapter/section/paragraph/policy</p> <p>The Mayor's vision Introduction, paras 23-28, p 6</p>
<p><i>Objecting or supporting representation?</i></p> <p>Supporting</p>	
<p><i>Grounds for representation</i></p> <p>Whilst supporting in principle the Mayor's vision for London as an exemplary sustainable world city, in our scrutiny report on Towards the London Plan we said:</p> <p><i>We believe that the London Plan should develop a more robust vision of the future of London. This vision should outline the path of development from the current situation, set spatial priorities, recognise and help resolve the inherent tensions between growth and sustainability, and incorporate wider concepts of environmental sustainability and social responsibility (Assembly scrutiny of Towards the London Plan, January 2002, recommendation 1).</i></p> <p>We welcome the fact that the Mayor's vision is now more clearly defined, with a proper strategic planning policy hierarchy – vision, objectives and policies – and that the policy implications of accommodating growth are now made more explicit (paras 24-28).</p> <p>In particular, we welcome the recognition that clear spatial priorities are needed (para 28). This fundamental element was underplayed in Towards the London Plan.</p> <p>We welcome too the rewording of the vision: “fundamental improvements in the environment and use of resources” (Draft London Plan, para 23). It was previously “fundamental improvements in <i>environmental management</i> and use of resources” (Towards the London Plan, para 1.20).</p>	
<p><i>Changes proposed, if any</i></p> <p>N/a</p>	
<p><i>Why propose these changes?</i></p> <p>N/a</p>	

<p>London Assembly rep. 2</p>	<p>Draft London Plan chapter/section/paragraph/policy</p> <p>Wealth disparities Introduction, para 1A.4, p 15</p>
<p><i>Objecting or supporting representation?</i></p> <p>Supporting (conditional support)</p>	
<p><i>Grounds for representation</i></p> <p>In our scrutiny report on Towards the London Plan, we reported the following:</p> <p><i>The RTPI (Royal Town Planning Institute) stated that the Plan falsely assumes its policies are mutually reinforcing, as clear tensions exist between economic growth and social polarisation. Doreen Massey called into question the assumption that basing London’s economic growth on the performance of global financial services sector will not exacerbate social polarisation in London. In her view, this has led to widening wealth disparities, as evidenced by City bonuses driving house price escalation at the top of the market. London is already the most unequal city in Europe. (Assembly scrutiny of Towards the London Plan, January 2002, para 2.30).</i></p> <p>We welcome the draft London Plan’s acknowledgement that “whilst overall wealth has increased, so has the disparity between rich and poor” (para 15). This acknowledgement was absent from Towards the London Plan.</p> <p>However, the Plan needs to do more than just acknowledge this issue. It needs to set out clearly how it intends to reduce wealth disparities in London.</p>	
<p><i>Changes proposed, if any</i></p> <p>The Plan should spell out in greater detail how the Mayoral priorities identified in paragraph 1A.4 – more new homes, business infrastructure, skills training and environmental improvement – will contribute to reducing the disparity between London’s rich and poor.</p>	
<p><i>Why propose these changes?</i></p> <p>To make more explicit the Plan’s contribution to reducing social polarisation.</p>	

<p>London Assembly rep. 3</p>	<p><i>Draft London Plan chapter/section/paragraph/policy</i></p> <p>Economic change and the finance and business services sector Chapter 1, Section 2: Economic growth Future economic and employment change, paras 1A.27-1A.29, pp 23-27 The finance and business services sector, paras 1A.30-1A.32, pp 27-28</p>
<p><i>Objecting or supporting representation?</i></p> <p>Objecting</p>	
<p><i>Grounds for representation</i></p> <p>In our scrutiny report on Towards the London Plan, we expressed concern about the lack of published evidence for the Mayor’s bullish predictions of sustained economic growth for the capital over the Plan period. We said:</p> <p><i>Further work in testing the sensitivity of the assumptions is required: It is clear that the Mayor does not expect to see a return to post war cycles of economic instability. We would like to see a more developed rationale and a robust justification for this belief. (Assembly scrutiny of Towards the London Plan, January 2002, recommendation 3).</i></p> <p>We welcome the fact that the Plan and its associated documentation (particularly SDS Technical Report Eight: The Future of Employment in Greater London) now provides more detail and more supporting data.</p> <p>However, a number of concerns remain, specifically in the Plan’s treatment of the finance and business services sector.</p> <p>€# The Plan refers in paragraphs 1A.30-2 to the ‘finance and business services’ sector as the major motor of London’s growth. These paragraphs quote a projected growth of around 440,000 jobs for this sector, and discuss the importance of this sector in maintaining London’s position in the global economy.</p> <p>€# However, it is clear from the text that it is the characteristics of financial services (not financial <i>and</i> business services) which are being described. It is our contention that these two sectors are quite different – in absolute numbers, scale of growth, and locational requirements.</p> <p>€# SDS Technical Report Eight usefully provides information for both of these sectors. It predicts a growth of 27,000 jobs to 2016 for the financial services sector. But growth in the business services sectors is predicted to grow by a massive 467,000 jobs. In other words, predicted growth in this combined sector is overwhelmingly dominated by performance of the business services sector. It accounts for 95% of this growth.</p>	

€# In our view, the financial services sector should be located in the City and Canary Wharf, as the Mayor suggests in the Plan, and as he stated in evidence to the Assembly's Planning and Spatial Development Committee. But we believe, along with the Association of London Government, who made the point strongly in evidence to the Planning and Spatial Development Committee, that business service growth could be spread throughout London, focused on the town centre network. This would give a more equitable distribution of job opportunities across the capital, and reduce congestion on routes to the centre.

Changes proposed, if any

The analysis in paragraphs 1A.30-2 should enumerate the different quantum of growth for each of the financial services *and* business services sectors, and should distinguish between their quite different sectoral characteristics and locational requirements.

Why propose these changes?

Treating the two sectors as one is misleading, given their dramatically different profiles and spatial characteristics.

<p>London Assembly rep. 4</p>	<p><i>Draft London Plan chapter/section/paragraph/policy</i></p> <p>The environmental imperative Chapter 1, Section 3, paras 1A.35-1A.37, pp 28-29</p>
<p><i>Objecting or supporting representation?</i></p> <p>Supporting</p>	
<p><i>Grounds for representation</i></p> <p>We welcome the inclusion of this section.</p> <p>In our scrutiny report on Towards the London Plan, we called for the Plan to incorporate wider notions of environmental sustainability and social responsibility:</p> <p><i>We believe that the London Plan should develop a more robust vision of the future of London. This vision should outline the path of development from the current situation, set spatial priorities, recognise and help resolve the inherent tensions between growth and sustainability, and incorporate wider concepts of environmental sustainability and social responsibility (Assembly scrutiny of Towards the London Plan, January 2002, recommendation 1).</i></p>	
<p><i>Changes proposed, if any</i></p> <p>N/a</p>	
<p><i>Why propose these changes?</i></p> <p>N/a</p>	

<p>London Assembly rep. 5</p>	<p>Draft London Plan chapter/section/paragraph/policy</p> <p>Social justice Chapter I, Section 6, paras 1A.44-1A.54, pp 31-33</p>
<p><i>Objecting or supporting representation?</i></p> <p>Supporting (conditional support)</p>	
<p><i>Grounds for representation</i></p> <p>In our scrutiny report on Towards the London Plan, we said:</p> <p><i>Towards the London Plan does not say enough about social exclusion. We want to see clear proposals with associated targets that will ensure that any further globalisation of London’s economy does not further exacerbate social polarisation. (Assembly scrutiny of Towards the London Plan, January 2002, recommendation 3).</i></p> <p>We welcome the draft London Plan’s acknowledgement that:</p> <p>“Whilst the poor are, in absolute terms, generally becoming less poor, have better homes on average and live longer than in past decades, the disparity in wealth and other quality of life measures between the poorest sections of society and the wealthiest is growing” (para 1A.45).</p> <p>“inequality has grown dramatically in London over the last 25 years. One of the aims in this plan is to contribute towards a more equitable distribution of the benefits of economic growth” (para 1A.47).</p> <p>“A key factor leading to greater inequality is that job growth is concentrated in higher paid and lower paid occupations – leading to increased polarisation of earnings”(para 1A.49).</p> <p>“housing costs are both a cause and a consequence of the polarisation of incomes” (para 1A.53).</p> <p>We also support the inclusion of:</p> <ul style="list-style-type: none"> ## a new Plan objective, Objective 4: promoting social inclusion and tackling deprivation and discrimination ## the performance indicators and targets for Objective 4, as set out in Table 5.4 (pp 284-5) <p>These</p> <p>However, whilst we welcome the inclusion measures which were recommended in the Assembly’s scrutiny of Towards the London Plan, we still feel that the Plan could set out more clearly how it intends to reduce wealth disparities in London.</p>	
<p><i>Changes proposed, if any</i></p> <p>The Plan should spell out in greater detail how it will contribute to reducing the disparity between London’s rich and poor.</p>	
<p><i>Why propose these changes?</i></p> <p>To make more explicit the Plan’s contribution to reducing social polarisation</p>	

<p>London Assembly rep. 6</p>	<p>Draft London Plan chapter/section/paragraph/policy</p> <p>Alternative scenarios for London’s future Chapter 1, Section 7: paras 1A55-1A.60, pp 34-36</p>
<p><i>Objecting or supporting representation?</i></p> <p>Supporting (but please see associated objecting representation)</p>	
<p><i>Grounds for representation</i></p> <p>In our scrutiny report on Towards the London Plan, we said:</p> <p><i>The Committee regrets that the Mayor has not given Londoners a more meaningful choice about options for the capital’s future development, and believes that defining London as a sustainable world city primarily around growth in the financial sector has restricted the debate on options for the future. A wider range of alternatives should be considered and rigorously analysed before moving to the next stage of the Plan (Assembly scrutiny of Towards the London Plan, January 2002, recommendation 2).</i></p> <p>We welcome the fact that that the Mayor has acknowledged this deficiency, and has undertaken a scenario-testing exercise, as recommended by the Assembly.</p> <p>The Mayor commissioned spatial planning consultants EDAW to advise the GLA on possible spatial scenarios to be used to test the robustness of the emerging London Plan. This was carried out during February to April 2002, and was based on an internal working draft of the London Plan (the public consultation draft Plan was published in June 2002). The consultants’ report was published as SDS Technical Report Seventeen: Spatial Development Strategy Scenario Testing, in August 2002.</p> <p>Whilst we welcome the Technical Report, and are pleased that its Introduction acknowledges the role of the Assembly’s scrutiny report in prompting this initiative (SDS Technical Report Seventeen, para 1.1), we have some reservations – not about what EDAW’s report says – but the way in which its findings are summarised in Section 7 of the Draft London Plan.</p> <p>Our concerns are set out in the associated objection.</p>	
<p><i>Changes proposed, if any</i></p> <p>N/a – but see associated objection</p>	
<p><i>Why propose these changes?</i></p> <p>N/a – but see associated objection</p>	

<p>London Assembly rep. 7</p>	<p>Draft London Plan chapter/section/paragraph/policy</p> <p>Alternative scenarios for London's future Chapter 1, Section 7: paras 1A55-1A.60, pp 34-36</p>
<p><i>Objecting or supporting representation?</i></p> <p>Objecting (but please see associated supporting representation)</p>	
<p><i>Grounds for representation</i></p> <p>In our scrutiny report on Towards the London Plan, we said:</p> <p><i>The Committee regrets that the Mayor has not given Londoners a more meaningful choice about options for the capital's future development, and believes that defining London as a sustainable world city primarily around growth in the financial sector has restricted the debate on options for the future. A wider range of alternatives should be considered and rigorously analysed before moving to the next stage of the Plan (Assembly scrutiny of Towards the London Plan, January 2002, recommendation 2).</i></p> <p>The accompanying supporting representation welcomes the fact that that the Mayor has acknowledged this deficiency, and has undertaken a scenario-testing exercise, as recommended by the Assembly.</p> <p>In paragraph 2.20 of the Assembly's scrutiny report, we advocated that such a scenario testing exercise should:</p> <ul style="list-style-type: none"> ⌘ evaluate alternative end-states – different visions of how London will look at the end of the plan period. We suggested four alternative end-state scenarios might be examined. ⌘ evaluate alternative magnitudes of growth – we identified questions over what range (high, medium or low) and form of growth were desirable. <p>EDAW's report reveals that they approached scenario-testing in two ways:</p> <ul style="list-style-type: none"> ⌘ Postulating differing levels of economic and population growth against differing levels of infrastructure supply. For each of four scenarios, EDAW explored the key elements and implications or risks for the Plan ⌘ Examining a series of spatial components that might play different roles in supporting the Plan's vision and objectives for London. <p>EDAW's scenario-testing report was published as SDS Technical Report Seventeen: Spatial Development Strategy Scenario Testing, in August 2002. Its findings are summarised in Section 7 of the Draft London Plan.</p> <p>Although we continue to maintain that the Plan would possess greater credibility if genuine alternatives had been considered at the start of the plan preparation period rather than towards the end, we endorse EDAW's approach to the task assigned them.</p> <p>However, we object to the way in which this work is summarised in the draft London Plan:</p> <ul style="list-style-type: none"> ⌘ Section 7 misrepresents EDAW's findings. There is no discussion of the 'risks for the SDS' sections in the EDAW report. And it is not clear how EDAW's work on the role of spatial components has been fed into the Plan. ⌘ Figure 1.13 is misleadingly titled. Only the vertical axis of the diagram is described. 	

Changes proposed, if any

- ⌘ Section 7 of the draft Plan should make it clear that there are pros and cons to each of the four scenarios discussed. It should be made clear how the work reported in Section 3.4 of the EDAW report (the Role of spatial components) has been fed into the Plan. It should acknowledge too the work in the EDAW report on key potential risks for the SDS (section 5.1).
- ⌘ The title of Figure 1.13 should be 'Possible future scenarios for London in 2020'. There should be a reference to paragraph 1A.58 which a description of the matrix is given.

Why propose these changes?

- ⌘ Figure 1.13's title should be accurate and easily understood.
- ⌘ Because the Mayor has drawn selectively from the research he has commissioned. The London Plan gives the impression there is no risk to the 'go for growth' scenario the Mayor has chosen. This is contrary to the findings of his own research.

<p>London Assembly rep. 8</p>	<p>Draft London Plan chapter/section/paragraph/policy</p> <p>London's place in the world Chapter 1, Section 1B, paras 1B.1-1B.18, pp 38-43</p>
<p><i>Objecting or supporting representation?</i></p> <p>Supporting (conditional support)</p>	
<p><i>Grounds for representation</i></p> <p>In our scrutiny report on Towards the London Plan, we said:</p> <p><i>Towards the London Plan concentrates on too narrow a vision of London's relationship with its external partners. The London Plan must facilitate the development of two-way partnerships between London and its neighbouring regions, the rest of the UK, and Europe. (Assembly scrutiny of Towards the London Plan, January 2002, recommendation 7).</i></p> <p>Whilst we welcome this new section – because it acknowledges a hierarchy of spatial relationships which were conspicuously absent from Towards the London Plan – we feel that the Plan should say much more about London's linkages and relationships with its neighbouring regions.</p> <p>In our view, the draft Plan is essentially inward looking, and does not reflect adequately the strong interdependence existing between London and the rest of the South East.</p>	
<p><i>Changes proposed, if any</i></p> <p>The Plan should be less inward looking and should do more to acknowledge London's linkages and relationships with its neighbouring regions.</p>	
<p><i>Why propose these changes?</i></p> <p>To better reflect the strong interdependence between London and the rest of the South East.</p>	

<p>London Assembly rep. 9</p>	<p>Draft London Plan chapter/section/paragraph/policy</p> <p>Sub-regional partnerships Chapter 2, Policy 2A.1 Sub-regional spatial frameworks, page 53 Chapter 5, Section 1, Policy 5.1: Working in partnership, page 262</p>
<p><i>Objecting or supporting representation?</i></p> <p>Support (conditional support)</p>	
<p><i>Grounds for representation</i></p> <p>In our scrutiny report on Towards the London Plan, we said:</p> <p><i>The Committee recommends that the Mayor fosters a closer relationship between his office and key delivery partners – not least the boroughs – to ensure wider ownership of the London Plan. A plan which is not substantially owned by those responsible for delivering it will never be implemented. (Assembly scrutiny of Towards the London Plan, January 2002, recommendation 15).</i></p> <p>Whilst we welcome the Mayor’s commitment to involve the boroughs directly in the development and implementation of the London Plan, we endorse the cautious note struck by the Association of London Government when they appeared before the Assembly’s Planning & Spatial Development Committee. In written evidence to the Committee, they said:</p> <p>“The Mayor is proposing to introduce 12 new implementation tools and five new partnerships to help deliver the plan. The ALG considers that there could be a case for ‘less may be more’ – an approach that the Government is undertaking in terms of its area based and other initiatives. The ALG believes that the current proposals would lead to greater bureaucracy and confusion”.</p> <p>We also believe that the Mayor must take care to ensure that the proposed sub-regional partnerships embody genuine partnership working with London’s boroughs and are not simply vehicles for centralised Mayoral direction.</p>	
<p><i>Changes proposed, if any</i></p> <p>The Mayor must take care to ensure that the proposed sub-regional partnerships:</p> <ul style="list-style-type: none"> ⊘ are focused and effective ⊘ embody genuine partnership working with London’s boroughs. 	
<p><i>Why propose these changes?</i></p> <ul style="list-style-type: none"> ⊘ To ensure that these new delivery mechanisms demonstrate added value. ⊘ To ensure the partnerships are not simply vehicles for centralised Mayoral direction. 	

<p>London Assembly rep. 10</p>	<p><i>Draft London Plan chapter/section/paragraph/policy</i></p> <p>Forecast sub-regional employment changes Chapter 2, Economic growth, paras 2A.27-32, pp 55-56 Table 2A.3 Forecast sub-regional employment changes, 2001-2016, page 55</p>
<p><i>Objecting or supporting representation?</i></p> <p>Objecting</p>	
<p><i>Grounds for representation</i></p> <p>Paragraph 2A.27 of the Plan says that consultants were asked to project the likely distribution of London’s future economic growth, in total and by sector, across London. The resulting allocation of forecast job growth by sub-region is shown in Table 2A.3. No explanation is provided as to how the Table’s distribution is arrived at.</p> <p>We believe that it is critical that this process be explained and properly justified. This allocation of projected job growth is fundamental to the Plan’s vision of London. It determines where job growth – and hence development – will occur across the capital. It sets the framework for London’s future.</p> <p>We assume that the consultants’ work referred to in paragraph 2A.27 is that written up in SDS Technical Report Twenty One: Demand and Supply of Business Space in London (‘published’ August 2002, made available on the web in September, but not yet available in printed form).</p> <p>One telling phrase stands out in this report:</p> <p>“However it should be noted that this contains no qualitative analysis as to whether the proposed supply of office space is of the right type in the right place” (SDS Technical Report Twenty One, Executive Summary, paragraph 10).</p> <p>In other words, this work, like that in SDS Technical Report Eight, extrapolates existing trends into the future. It makes statistical projections. It says this is what will happen if things carry on as they have in the past. This is not the consultants’ fault. They have done what they were asked to do, and they have rightly qualified their findings.</p> <p>The Plan, however, presents this information as an inevitability. It is, as we have said elsewhere in these representations, the product of the Plan’s ‘predict and provide’ mentality.</p>	

In our scrutiny report on Towards the London Plan we said:

Despite the emphasis on sustainability, Towards the London Plan does not assign priority to the minimisation of the need to travel between home, work and facilities. The Committee believes that reducing the need to travel would be consistent with PPG13², the principles behind more sustainable development, and attempts to develop local communities and neighbourhoods. This would require a more polycentric form of development, perhaps based on a greater share of growth being focused on the various town centres rather than being concentrated around central London. (Assembly scrutiny of Towards the London Plan, January 2002, paragraph 3.36).

Little appears to have changed. In our view, the Mayor has missed a major opportunity in the draft London Plan to redirect London's employment growth into a more sustainable pattern, spread throughout London and focused on the network of town centres. This would give a more equitable distribution of employment opportunities for Londoners, reduce the pressure on the centre, and help to tackle congestion.

We fully accept that the financial services sector should continue to locate in the centre and the east, but we believe, with the Association of London Government, that rebalancing employment growth by directing a greater proportion of business service growth towards the town centre network could be achieved without detriment to London's global position.

That TfL acknowledge (in paragraph 2A.38 of the Plan) that there will be insufficient capacity in the transport network to service the distribution of employment growth envisaged in Table 2A.3, only serves to reinforce the merits of our case.

Changes proposed, if any

The Mayor:

€# should acknowledge that Table 2A.3 shows only a possible distribution of employment growth across London if current trends persist

€# use this as a starting point to plot, in consultation with the boroughs, a more equitable distribution of employment growth focused on London's network of town centres

€# rework the rest of Chapter 2 accordingly

Why propose these changes?

In the interests of delivering genuine sustainable development for London.

² Planning Policy Guidance Note 13: Transport, DETR March 2001

<p>London Assembly rep 11</p>	<p>Draft London Plan chapter/section/paragraph/policy</p> <p>Transport accessibility Chapter 2, paras 2A.33-2A.38, pp 56-58 Map 2A Access to public transport, page 56</p>
<p><i>Objecting or supporting representation?</i></p> <p>Objecting</p>	
<p><i>Grounds for representation</i></p> <p>In our scrutiny report on Towards the London Plan, we said:</p> <p><i>The Draft London Plan needs to show how the proposed pattern of transport provision at the end of the Plan period will meet the needs of the new pattern of employment, housing and facilities. It should also demonstrate how Londoners’ travel needs will be met in the interim before major public transport infrastructure schemes are completed. The Draft London Plan should include priorities and detailed phasing for the delivery of necessary transport proposals ahead of or in time for planned major developments of housing and jobs. (Assembly scrutiny of Towards the London Plan, January 2002, recommendation 11).</i></p> <p>Using accessibility contours, Map 2A.5 plots existing public transport accessibility. Given that future transport provision is known and programmed (see Table 5.3 Timing of major transport schemes, page 279), and the Plan allocates major trip generating development across London, we are disappointed that the Plan does not attempt to estimate public transport accessibility for the end of the Plan period.</p> <p>When questioned at the Assembly’s Transport Committee on 2 July 2002, SDS officers indicated that TfL had been commissioned to carry out this work for the end of the Plan period, and that the work was underway. The Mayor confirmed this when questioned by the Assembly’s Planning and Spatial Development Committee on 17 September.</p> <p>Whilst we welcome these responses, we remain in the position of not knowing whether public transport accessibility will get better or worse during the lifetime of the Plan.</p> <p>This uncertainty is compounded by the lack of any commitment in the Plan to increase public transport accessibility – surely a commitment that the Mayor should readily make.</p>	
<p><i>Changes proposed, if any</i></p> <p>⚡ The Plan should include a map showing projected public transport accessibility in 2016</p> <p>⚡ The Plan should contain an objective and policy to increase public transport accessibility over the lifetime of the Plan.</p>	

Why propose these changes?

€# So that the impact of the Mayor's spatial development policies on London's public transport accessibility can be judged. As we said in our scrutiny report, the London Plan needs to show how the proposed pattern of transport provision at the end of the Plan period will meet the needs of the new pattern of employment, housing and facilities.

€# Increased public transport accessibility will benefit all London's residents and workers.

<p>London Assembly rep 12</p>	<p><i>Draft London Plan chapter/section/paragraph/policy</i></p> <p>Transport capacity Chapter 2, paras 2A.32-2A.38, pp 56-58</p>
<p><i>Objecting or supporting representation?</i></p> <p>Objecting</p>	
<p><i>Grounds for representation</i></p> <p>In our scrutiny report on Towards the London Plan, we said:</p> <p><i>The Draft London Plan needs to show how the proposed pattern of transport provision at the end of the Plan period will meet the needs of the new pattern of employment, housing and facilities. It should also demonstrate how Londoners’ travel needs will be met in the interim before major public transport infrastructure schemes are completed. The Draft London Plan should include priorities and detailed phasing for the delivery of necessary transport proposals ahead of or in time for planned major developments of housing and jobs. (Assembly scrutiny of Towards the London Plan, January 2002, recommendation 11).</i></p> <p>Paragraph 2A.32 of the Plan poses the question – with the expected growth in population and jobs in London, can the transport system cope?</p> <p>Paragraph 2A.35 acknowledges that there is very limited spare capacity in the public transport network for journeys to work at the present time.</p> <p>Paragraph 2A.38 acknowledges the relationship between the scale and phasing of development and public transport accessibility is critical – echoing recent observations made by the Assembly’s Transport and Economic and Social Development Committees. The Plan goes on to say “the TfL study goes on to show that there are some phasing concerns. Assuming that all of the schemes included in the Mayor’s Transport strategy are completed on time, there would still be insufficient capacity at some points in the network. Since the publication of the Mayor’s Transport Strategy it has become apparent that the original timescales cannot be achieved.”</p> <p>This is a serious matter. The Mayor has admitted that he cannot deliver sufficient transport capacity for the scale of development the Plan promotes. In other words, congestion is set to increase. Under the Plan, Londoners’ quality of life will not improve.</p>	

Changes proposed, if any

€# The Plan should demonstrate that sufficient transport capacity will be provided for the scale of development that it envisages through to 2016.

€# If sufficient capacity cannot be provided, as appears currently to be the case, the Mayor should:

€# either introduce measures to broaden the scope of transport programme with additional intermediate mode transport links – more trams, for example – around outer London, or

€# he should reallocate business services employment growth at sub-regional level with more going to the town centre network, and less to the centre. As we have argued elsewhere in our representations, the latter option would place less strain on radial transport links.

Why propose these changes?

€# Unless development levels are matched to transport capacity in London, or vice versa, congestion will increase and quality of life will diminish.

€# To clarify the relationship between the statements in this section and Policy 3C.2 Matching development to transport capacity (Page 176).

<p>London Assembly rep. 13</p>	<p><i>Draft London Plan chapter/section/paragraph/policy</i></p> <p>The suburbs Chapter 2, paras 2A.53-2A.59, pp 65-67 Policies 2A.7-9, page 65</p>
<p><i>Objecting or supporting representation?</i></p> <p>Supporting (conditional support)</p>	
<p><i>Grounds for representation</i></p> <p>In our scrutiny report on Towards the London Plan, we called for the draft London Plan to pay attention to London’s suburbs, which we felt the Mayor was ignoring. We welcome then this new section and its policies and proposals.</p> <p>In our view, however, the potential effectiveness of these policies is undermined by other elements of the Plan, particularly the proposed allocation of employment growth, under which 76.5% of new jobs would be steered to the centre and the east of London (see Table 2A.3 of the draft London Plan).</p> <p>We support the ALG’s call for recognition of London’s great strengths – its polycentric form of development, its longstanding network of town and neighbourhood centres – and endorse their identification of the need to improve orbital transport links to and between suburban centres using buses, trams, light rail, and cycles. “Without such transport improvements”, they say, “congestion and environmental conditions will worsen. The result will be loss of competitiveness of local business and pressure on business to move out of such congested areas to the wider south east. The cost of developing these transport links would be relatively cheap.”</p> <p>If the Plan is serious about strengthening the suburbs, much more will need to be done in terms of reallocating employment growth and reassigning transport priority.</p>	
<p><i>Changes proposed, if any</i></p> <p>These policies need to be supported by reallocating of employment growth in favour of the town centre network, and reassigning transport priority in favour of intermediate modes in outer London.</p>	
<p><i>Why propose these changes?</i></p> <p>To deliver genuine sustainable development across all London.</p>	

<p>London Assembly rep. 14</p>	<p><i>Draft London Plan chapter/section/paragraph/policy</i></p> <p>Increasing housing supply Chapter 3, Section 1:Housing policies, paras 3A.6-3A.19, pp 112-117</p>
<p><i>Objecting or supporting representation?</i></p> <p>Objecting</p>	
<p><i>Grounds for representation</i></p> <p>Whilst we recognise the obligation the Mayor has to include within the Draft Plan the Government’s annual housing provision figure of 23,000 homes a year, and we acknowledge that the Plan calls upon boroughs to include in their unitary development plans policies which exceed their individual provision targets, we feel the Mayor could do more to facilitate increased provision.</p> <p>The Assembly’s scrutiny report on affordable housing (Key Issues for Key Workers, February 2001) endorsed the recommendation of the Mayor’s Housing Commission that 43,000 new homes were required each year to meet London’s housing need. When discussing the Draft Plan, the Assembly’s Economic and Social Development Committee noted with regret the apparent abandonment by the Mayor of his Commission’s recommendation.</p> <p>The Mayor clearly believes that the Government’s housing provision figure should be exceeded wherever possible, but the Plan leaves it to the boroughs to devise ways to exceed the statutory minimum. We believe it would be more helpful if the Plan gave detailed guidance to the boroughs on what could be achieved locally.</p> <p>Whilst we support in principle the objective of increasing housing supply, we believe the Plan could do more to demonstrate that there is sufficient housing land capacity to meet housing need, and it must demonstrate clearly that higher housing densities will not impact negatively on residents’ quality of life.</p>	
<p><i>Changes proposed, if any</i></p> <ul style="list-style-type: none"> ⚡# The London Plan should give detailed guidance to the boroughs on what could be achieved above local housing provision figures. ⚡# The Plan needs to do more to demonstrate that there is sufficient housing land capacity to meet housing need ⚡# The Plan must demonstrate clearly that higher housing densities will not impact negatively on residents’ quality of life. 	
<p><i>Why propose these changes?</i></p> <ul style="list-style-type: none"> ⚡# To encourage all parties (boroughs, housing providers, developers) to tackle the gap between housing need and supply. ⚡# To ensure that quality of life does not diminish with higher housing density. 	

<p>London Assembly rep. 15</p>	<p>Draft London Plan chapter/section/paragraph/policy</p> <p>Increasing the provision of affordable housing Chapter 3, Section 1: Housing policies, paras 3A.39-3A.50, pp 125-130</p>
<p><i>Objecting or supporting representation?</i></p> <p>Supporting (conditional support)</p>	
<p><i>Grounds for representation</i></p> <p>In our scrutiny report on Towards the London Plan, we recommended that:</p> <p><i>The London Plan should promote an integrated strategy to improve the delivery of affordable housing. (Assembly scrutiny of Towards the London Plan, January 2002, recommendation 9).</i></p> <p>We also said:</p> <p><i>In the London Plan, the Mayor has the opportunity to indicate, in overall terms, where to build, mechanisms to deliver, and means of streamlining the process to respond to need. The Plan should identify how the housing industry, planning and property professions could be engaged more effectively to find effective and appropriate solutions rather than impose a rigid city-wide formula that may be inappropriate to many situations. (Assembly scrutiny of Towards the London Plan, January 2002, paragraph 3.29).</i></p> <p>We therefore welcome the fact that the Mayor has responded to our call for a degree of local flexibility and has commissioned detailed research to justify setting affordable targets of either 50% or 35% at borough level, as set out in Table 3A.3.</p> <p>What is less clear, however, is how this will operate in practice, and how these varied targets could in aggregate deliver the Mayor’s overall target of 50% affordable housing across London. Detailed study of the Plan reveals that the borough-level affordable housing targets are intended to apply to developer-led schemes, and not to schemes from social housing providers, where the presumption is that 100% affordable housing will be delivered. The Plan could be clearer on this issue.</p>	
<p><i>Changes proposed, if any</i></p> <p>Make explicit in the text of this section, and the title of Policy 3A.8, that the 35% or 50% borough level affordable housing target applies to negotiations with developers of residential schemes and mixed-use schemes that include housing.</p>	
<p><i>Why propose these changes?</i></p> <p>For operational clarity.</p>	

<p>London Assembly rep. 16</p>	<p><i>Draft London Plan chapter/section/paragraph/policy</i></p> <p>Improving skills and employment opportunities Chapter 3, section 5, paras 3B.53-3B.60, pp 172-174 Policy 3B.13 Improving the skills and employment opportunities for Londoners, page 172</p>
<p><i>Objecting or supporting representation?</i></p> <p>Objecting</p>	
<p><i>Grounds for representation</i></p> <p>With the magnitude of job growth expected by the Mayor, it is critical that the Plan demonstrates clearly how the capital's skill profile can be raised sufficiently to allow Londoners to compete on equal terms and successfully for these new jobs. The Assembly's Economic and Social Development Committee has identified this as one of the key issues for the Plan, and for London's future.</p> <p>The Mayor agrees with us. When the Planning and Spatial Development Committee asked him on 18 July 2002 what might the implications be if these new jobs were created, but did not go to Londoners, he replied:</p> <p>"Then I would consider my period as Mayor to have been a failure. It's that simple. It's going to be absolutely essential to me and my successors to avoid that, otherwise we will have all the continuing problems of deprivation, high crime, low achievement and ruined lives in an arc that runs from Harlesden, a bit interrupted around Hampstead I'll grant you, all the way out to Barking and from Edmonton down to Peckham. Two million people live in that area and a lot of those who have actually got jobs could be doing better jobs and more productive jobs. So then, I would have failed."</p> <p>Measured against the scale of the challenge acknowledged by the Mayor, Policy 3B.13 is, in our view, woefully inadequate. It is no more than an expression of intent. The statement "co-ordinate and provide the spatial context alongside the range of initiatives necessary to improve the employment opportunities for London and remove barriers to employment" (from Policy 3B.13) is a high level objective, not detailed policy. We also note that the policy fails to spell out a role for boroughs' unitary development plans on this issue.</p> <p>We welcome the London Development Agency's commitment to revise the Economic Development Strategy in the light of the emerging London Plan, but as it stands, Policy 3B.13 does not give the Agency enough of a steer.</p>	
<p><i>Changes proposed, if any</i></p> <p>Rewrite Policy 3B.13 to make explicit in spatial development terms what the Mayor intends to do about addressing the skills deficit in London, and what he expects boroughs to do in their unitary development plans.</p>	
<p><i>Why propose these changes?</i></p> <p>Because, as it stands, Policy 3B.13 is an aspiration, rather than a substantive policy</p>	

<p>London Assembly rep. 17</p>	<p>Draft London Plan chapter/section/paragraph/policy</p> <p>Closer integration of transport and spatial development Chapter 3, Section 3C, Policy 3C.1: Integrating transport & development, Policy 3C.2: Matching development to transport capacity, page 176</p>
<p><i>Objecting or supporting representation?</i></p> <p>Supporting</p>	
<p><i>Grounds for representation</i></p> <p>In our scrutiny report on Towards the London Plan, we said:</p> <p><i>The Draft London Plan needs to show how the proposed pattern of transport provision at the end of the Plan period will meet the needs of the new pattern of employment, housing and facilities. It should also demonstrate how Londoners’ travel needs will be met in the interim before major public transport infrastructure schemes are completed. The Draft London Plan should include priorities and detailed phasing for the delivery of necessary transport proposals ahead of or in time for planned major developments of housing and jobs. (Assembly scrutiny of Towards the London Plan, January 2002, recommendation 11).</i></p> <p>We strongly support Policy 3C.1 and 3C.2. They epitomise the ‘plan, monitor and manage’ approach to strategic planning, as advocated by the Assembly. It is only through ‘reality check’ policies such as these that the London Plan can hope to deliver a sustainable future for London.</p> <p>We note, however, that this operation of these policies, together with other parts of the Plan – notably Table 5.3: Timing of major transport infrastructure schemes, and paragraph 2A.38 on acknowledging TfL’s inability to deliver sufficient transport capacity – indicate that the levels of development anticipated by the Mayor over the Plan’s lifetime may have to be revised downwards or spatially redistributed. These policies also expose the Plan’s degree of vulnerability to delays or alterations to the programme of transport investment, as set out in Table 5.3. We are concerned that so much of the Plan’s implementation appears to depend upon the delivery of Crossrail. Table 5.3 shows that this will not open until 2011 at the earliest. Progress is dependent on Government support and on construction proceeding without delays. In these circumstances, the Mayor needs to demonstrate that he has a fall back strategy, but the draft Plan has none.</p> <p>This point has been noted by the Assembly’s Transport, and Economic and Social Development Committees, reinforced in evidence to us from the Association of London Government, and confirmed by the Mayor himself, who on 18 July 2002 told us “If the Government decided not to proceed with Crossrail, then this Plan would be inoperative and we’d have to go back and start again. . . .If the Government says no to Crossrail, we will have to scrap this effectively and start again”.</p>	
<p><i>Changes proposed, if any</i></p> <p>N/a</p>	
<p><i>Why propose these changes?</i></p> <p>N/a</p>	

<p>London Assembly rep. 18</p>	<p><i>Draft London Plan chapter/section/paragraph/policy</i></p> <p>Providing waste recycling facilities Chapter 4, Section 1: Planning for waste, paras 4A.6-4A.11, pp 224-229 Policy 4A.1, Policy 4A.2, Policy 4A.3, pp 224-226</p>
<p><i>Objecting or supporting representation?</i></p> <p>Supporting (conditional support)</p>	
<p><i>Grounds for representation</i></p> <p>With respect to recycling, the draft London Plan:</p> <ul style="list-style-type: none"> €# Commits the Mayor to working in partnership with relevant parties to achieve and exceed recycling and composting targets (Policy 4A.1) €# Asks Boroughs to identify in their Unitary Development Plans new sites for recycling and closed vessel composting, and adds that the Mayor will produce Supplementary Planning Guidance on planning for waste (Policy 4A.2) €# Identifies locational criteria for site selection (Policy 4A.3) €# States that the Mayor will issue Supplementary Planning Guidance on sustainable design and construction which will address the proper provision of facilities for recycling within new developments (paragraph 4A.11). <p>We welcome these policies and statements.</p> <p>We would however, endorse the concerns expressed by the Assembly’s Environment Committee, which identified a need for the Plan to be firmer on translating these objectives into action at borough level. In our view, the Plan should include in policy a requirement that boroughs should in their UDPs specify the level of recycling and composting facilities needed at neighbourhood level to meet the Mayor’s targets.</p>	
<p><i>Changes proposed, if any</i></p> <p>A new policy, or amendments to Policies 4A.1-3, requiring boroughs to specify in their UDPs the level of recycling and composting facilities needed at neighbourhood level to meet the Mayor’s targets.</p>	
<p><i>Why propose these changes?</i></p> <p>To assist with the implementation of the Mayor’s Municipal Waste Management Strategy.</p>	

<p>London Assembly rep. 19</p>	<p><i>Draft London Plan chapter/section/paragraph/policy</i></p> <p>Promoting renewable energy Chapter 4, Section 4: Improving the use of energy, paras 4A.22-27, pp 233-6 Policies 4A.7-10, pp 233-235</p>
<p><i>Objecting or supporting representation?</i></p> <p>Supporting (conditional support)</p>	
<p><i>Grounds for representation</i></p> <p>The draft London Plan contains policies on:</p> <ul style="list-style-type: none"> ⌘ Energy efficiency and renewable energy: the Mayor will, and ask Boroughs to, support the Energy Strategy by expecting energy efficiency and renewable energy measures to be included in new development wherever feasible (Policy 4A.7) ⌘ Energy assessment of proposed major developments: the Mayor will, and ask Boroughs to, assess the energy demand of proposed major developments and expect developers to consider renewable energy first (Policy 4A.8) ⌘ Providing for renewable energy: the Mayor will, and ask Boroughs to, expect developments to generate a proportion of the site's electricity or heat needs from renewable energy sources, where feasible (Policy 4A.9) ⌘ Supporting the provision of renewable energy: the Mayor will, and asks Boroughs to, identify suitable sites for wind turbines and solar technologies (Policy 4A.10). <p>These are all good proposals and we welcome them. We acknowledge too the difficulties the Mayor faces in shaping the energy profile of the capital's stock of buildings, as only a minority each year of the total stock are new build and subject to planning control.</p> <p>However we would like to see the Plan go further. We endorse the Assembly's Environment Committee view that the Mayor should ask boroughs to include renewable energy targets in their UDPs. The Plan should also be more explicit about the spatial implications of developing a hydrogen infrastructure for London, in terms of depot stations which would be required at borough level for refuelling.</p>	
<p><i>Changes proposed, if any</i></p> <ul style="list-style-type: none"> ⌘ Amend Policy 4A.7 to include a requirement that boroughs include renewable energy targets in their UDPs ⌘ Amend Policy 4A.10 to address the spatial implications of developing a hydrogen infrastructure for London at borough level 	
<p><i>Why propose these changes?</i></p> <p>To assist with the implementation of the Mayor's Energy Strategy.</p>	

<p>London Assembly rep. 20</p>	<p>Draft London Plan chapter/section/paragraph/policy</p> <p>Sustainability Appraisal Chapter 4, Section 4C: Reconciliation check, paras 4C.3 – 4C.6, page 255</p>
<p><i>Objecting or supporting representation?</i></p> <p>Objecting</p>	
<p><i>Grounds for representation</i></p> <p>Government advice on the preparation of the Mayor’s spatial development strategy states:</p> <p>“The sustainability appraisal process of the SDS should allow for a systematic and iterative testing of the emerging proposals. The appraisal should be undertaken by parties who are independent from the SDS preparation process. The Mayor must as a minimum publish a formal appraisal alongside the proposed SDS. But the appraisal principles should be applied at each stage in the preparation of the SDS, with the results of the appraisal informing the next version”. (GOL Circular 1/2000, paragraph 4.6)</p> <p>As this implies an iterative approach to policy development and refinement, with testing at each stage of the strategy, we were concerned to learn that at the time of the publication of Towards the London Plan (May 2001), a sustainability appraisal had yet to be undertaken. So in our scrutiny report on Towards the London Plan, we said:</p> <p><i>The Committee regrets that Towards the London Plan was not subjected to a sustainability appraisal. We believe there should be an intermediary stage <u>before</u> the publication of the Draft London Plan where a range of options are tested through a sustainability appraisal. (Assembly scrutiny of Towards the London Plan, January 2002, recommendation 4).</i></p> <p>The Mayor finally published a sustainability appraisal of the draft London Plan in June 2002. Prepared by independent consultants Entec UK Limited, it was released at the same time as the draft London Plan. The Assembly’s Environment Committee questioned SDS officers and the Planning and Spatial development Committee questioned the Mayor on the sustainability appraisal. Arising from both discussions we have a number of concerns about the appraisal process:</p> <ul style="list-style-type: none"> ⚡ An annex to Intec’s report states that the policy directions in Towards the London Plan were appraised. But what the report does not make clear is that this appraisal was carried out after the document was completed. In our view, the retrospective nature of the appraisal of Towards the London Plan should be made explicit. ⚡ We are unable to establish at what stage the draft Plan was appraised. We cannot therefore determine what impact (if any) the retrospective appraisal of Towards the London Plan or the appraisal of the draft London Plan had on emerging Plan policy. ⚡ The sustainability appraisal evaluates each of the draft Plan’s policies on its individual merits, but gives little consideration to the cumulative effect of the Plan’s policies or indeed the uncertain and conditional nature of many of the Plan’s policies. 	

€# Under EU law, a Strategic Environmental Assessment (SEA) of the Plan will be compulsory in four or five years time. An SEA involves wider environmental plan assessment than traditional models of sustainability appraisal. We recommend that the Mayor undertakes an SEA ahead of the requirement date. This would permit an analysis of the cumulative impact of the Plan's policies, display a public commitment to the most rigorous tests of sustainability, and would place the Mayor at the forefront of environmental best practice. When we put this to the Mayor at Planning and Spatial Development Committee on 17 September, he would "look into it".

€# We note that there has been a plethora of SDS technical reports looking at different aspects of the Plan, but none yet have addressed environmental issues. The draft Plan too contains much economic data, but is remarkably light on environmental data. Whilst we acknowledge that the Plan's primary focus is spatial, we feel that more detailed data on London's environment would have provided an improved framework for the Plan's policies and should have been included.

Changes proposed, if any

The Mayor should agree to undertake a Strategic Environmental Assessment of the Plan.

Why propose these changes?

So that the Mayor can demonstrate environmental best practice.

<p>London Assembly rep. 21</p>	<p><i>Draft London Plan chapter/section/paragraph/policy</i></p> <p>Priorities in planning obligations Chapter 5, Policy 5.3, page 270</p>
<p><i>Objecting or supporting representation?</i></p> <p>Objecting</p>	
<p><i>Grounds for representation</i></p> <p>The Assembly’s Green Spaces scrutiny report pointed to S.106 funding as an important source of funding for new and enhanced open spaces in London.</p> <p>The Assembly’s Environment Committee, when considering the draft London Plan, highlighted the absence of open space from the Mayor’s planning obligations priorities as listed in Policy 5.3.</p> <p>We consider that open spaces should be added to Policy 5.3 as a S.106 priority.</p>	
<p><i>Changes proposed, if any</i></p> <p>Add open space to the list of S.106 priorities in Policy 5.3.</p>	
<p><i>Why propose these changes?</i></p> <p>To ensure that the provision of new open space and the upgrading of existing open space continues to receive priority in London.</p>	

<p>London Assembly rep. 22</p>	<p><i>Draft London Plan chapter/section/paragraph/policy</i></p> <p>A wider role for the Mayor in Planning obligations? Chapter 5, Policy 5.3 and 5.4, paras 5.39-5.42, pp 270-71</p>
<p><i>Objecting or supporting representation?</i></p> <p>Objecting</p>	
<p><i>Grounds for representation</i></p> <p>The Mayor seeks secondary legislation to enable him to be a party in S.106 negotiations on applications referred to him under his strategic planning powers.</p> <p>We share the Association of London Government’s view that this will by definition reduce the power of local authorities to negotiate planning gain for the benefit of their own communities.</p>	
<p><i>Changes proposed, if any</i></p> <p>Delete references to the Mayor seeking legislative change to enable him to be a party in S.106 negotiations.</p>	
<p><i>Why propose these changes?</i></p> <p>Legislative change is not required. As we noted in Behind Closed Doors (May 2002), our scrutiny report on the Mayor’s planning decisions, the Mayor is able to exercise sufficient leverage on the outcome of S.106 negotiations on strategic planning applications through the operation of his planning decisions powers.</p>	

<p>London Assembly rep. 23</p>	<p>Draft London Plan chapter/section/paragraph/policy</p> <p>Phasing of growth in jobs and population Chapter 5, section 4: Managing change and measuring progress Table 5.1: Indicative phasing of growth in jobs and population, page 277</p>
<p><i>Objecting or supporting representation?</i></p> <p>Objecting</p>	
<p><i>Grounds for representation</i></p> <p>Whilst we support the inclusion of Table 5.1 in the Plan, we are concerned at the way in which sub-regional employment forecasts are suddenly presented as <i>targets</i>.</p> <p>Though this altered status of the employment figures is not explicit from the table itself, Policy 5.7: Phasing of development and transport provision, states: "Boroughs should seek to manage development so that it is phased around the broad indicative targets in Table 5.1".</p> <p>We do not object to the 'plan, monitor, manage' approach epitomised by Policy 5.7 and illustrated in Table 5.1. And we accept the requirement for housing targets. Rather, it is the way in which the table's employment targets are derived which causes us concern.</p> <p>Elsewhere in our representations, we expressed caution over the Plan's handling of employment projections (in particular, the analysis of the finance and business services sector in paragraphs 1A.30-31), and the way in which projected employment growth is allocated between the sub-regions in Table 2A.3. Paragraph 2A.27 confirms that Table 2A.3 shows a projection of the '<i>likely distribution</i>' of economic growth across London, yet here in Table 5.1 the same information is presented as '<i>broad indicative targets</i>' (Policy 5.7).</p> <p>This illustrates for us the traditional, and now discredited, 'predict and provide' ethos which weaves in and out of the Plan. It does not sit comfortably with the progressive 'plan, monitor, manage' philosophy which informs most of the Plan's implementation policies.</p> <p>By sleight of hand, forecasts become targets, enabling the Mayor to claim that London has no choice but to run with his vision of financial services driven growth.</p>	
<p><i>Changes proposed, if any</i></p> <p>The Mayor needs to justify properly how his employment forecasts become targets. The policy choices involved in this process need to be made explicit.</p>	
<p><i>Why propose these changes?</i></p> <p>To resolve the ideological clash between 'predict and provide' at the start of the Plan, and 'plan, monitor, manage' towards the end.</p>	

<p>London Assembly rep. 24</p>	<p>Draft London Plan chapter/section/paragraph/policy</p> <p>Timing of major transport schemes Chapter 5, Table 5.3, page 279</p>
<p><i>Objecting or supporting representation?</i></p> <p>Support (conditional support)</p>	
<p><i>Grounds for representation</i></p> <p>In our scrutiny report on Towards the London Plan, we said:</p> <p><i>The Draft London Plan needs to show how the proposed pattern of transport provision at the end of the Plan period will meet the needs of the new pattern of employment, housing and facilities. It should also demonstrate how Londoners’ travel needs will be met in the interim before major public transport infrastructure schemes are completed. The Draft London Plan should include priorities and detailed phasing for the delivery of necessary transport proposals ahead of or in time for planned major developments of housing and jobs. (Assembly scrutiny of Towards the London Plan, January 2002, recommendation 11).</i></p> <p>We support the inclusion of Table 5.3 in the Plan. This is the sort of phasing information that we called for in our scrutiny of Towards the London plan.</p> <p>We note, however, that this table demonstrates that many key schemes are not expected to be completed until well into the Plan period. We are concerned that so much of the Plan’s implementation appears to depend upon the delivery of Crossrail. Table 5.3 shows that this will not open until 2011 at the earliest. Progress is dependent on Government support and on construction proceeding without delays. In these circumstances, the Mayor needs to demonstrate that he has a fall back strategy, but the draft Plan has none.</p> <p>We note too that with Policies 3C.1 and 3C.2 operating to peg development to capacity – quite rightly, in our view – development levels anticipated by the Mayor over the Plan’s lifetime may have to be revised downwards redistributed spatially.</p> <p>This table also exposes the Plan’s degree of vulnerability to delays or alterations to the programme of transport investment, and the lack of any fall back strategy from the Mayor. This point has been noted by the Assembly’s Transport, and Economic and Social Development Committees, reinforced in evidence to us from the Association of London Government, and confirmed by the Mayor himself, who on 18 July 2002 told us “If the Government decided not to proceed with Crossrail, then this Plan would be inoperative and we’d have to go back and start again....If the Government says no to Crossrail, we will have to scrap this effectively and start again”.</p>	
<p><i>Changes proposed, if any</i></p> <p>N/a</p>	
<p><i>Why propose these changes?</i></p> <p>N/a</p>	

<p>London Assembly rep 25</p>	<p><i>Draft London Plan chapter/section/paragraph/policy</i></p> <p>Measuring progress Chapter 5, paras 5.74-5.76, pp 280-281 Policy 5.9 Measuring progress, page 280 Table 5.4 Key performance measures, pp 284-285</p>
<p><i>Objecting or supporting representation?</i></p> <p>Supporting</p>	
<p><i>Grounds for representation</i></p> <p>In our scrutiny report on Towards the London Plan, we said: <i>The Draft London Plan must clearly set out strategic objectives as well as policies, and must contain targets against which indicators can be evaluated and performance measured. (Assembly scrutiny of Towards the London Plan, January 2002, recommendation 6).</i></p> <p>We support the provision of performance indicators and targets, as set out in Table 5.4, and we welcome the Mayor’s commitment to publish an Annual report on Plan progress against targets, as provided for under Policy 5.9</p>	
<p><i>Changes proposed, if any</i></p> <p>N/a</p>	
<p><i>Why propose these changes?</i></p> <p>N/a</p>	

<p>London Assembly rep. 26</p>	<p><i>Draft London Plan chapter/section/paragraph/policy</i></p> <p>Supplementary planning guidance References scattered throughout the Plan</p>
<p><i>Objecting or supporting representation?</i></p> <p>Objection</p>	
<p><i>Grounds for representation</i></p> <p>The Plan contains many references to daughter documents which will carry forward its policies – these are variously termed supplementary planning guidance (SPG), good practice guides (GPG), and best practice guides (BPG). The Mayor has supplied us with a list which shows 13 SPGs and 9 BPGs. The Association of London Government, working from the same source, has listed 17 SPGs. Leaving to one side confusion about how many of these documents are in the offing, we have two concerns about this approach to strategic planning.</p> <p>Under the Planning Acts, local planning authorities may produce SPG in association with a development plan. As the London Plan is not in law a development plan, it is a matter of conjecture as to whether these proposed SPGs will be lawful, and capable of enforcement – that is to say, will they stand up at appeal if relied on by the Mayor in support of a direction, or by a borough in support of a determination?</p> <p>Not one of these promised documents has yet been released for public consultation. Neither is it clear how many will be made available before the Examination in Public. Those that materialise after the EIP will avoid the Panel’s scrutiny. This is not an acceptable state of affairs.</p>	
<p><i>Changes proposed, if any</i></p> <p>⚡ The Mayor should assure himself that London Plan SPGs will have legal force.</p> <p>⚡ The Mayor should release for public consultation all the proposed London Plan SPGs well in advance of the Examination in Public.</p>	
<p><i>Why propose these changes?</i></p> <p>⚡ To minimise the risk of legal challenge to the London Plan and its implementation.</p> <p>⚡ In the interest of meaningful consultation and public examination of the Plan and its associated documents.</p>	

<p>London Assembly rep 27</p>	<p><i>Draft London Plan chapter/section/paragraph/policy</i></p> <p>Format of the draft London Plan</p>
<p><i>Objecting or supporting representation?</i></p> <p>Objecting</p>	
<p><i>Grounds for representation</i></p> <p>The draft London Plan is not a user friendly document.</p> <p>It is too long, too heavy, and poorly bound. The spine splits after a few readings, and pages fall out.</p> <p>The glare from the pages makes it difficult to read in certain conditions.</p> <p>The inset maps are too small and the London diagram (page 109) in its current format is meaningless.</p> <p>It is also very difficult to navigate. Lacking an index, and a detailed contents page, it is hard to find a particular policy unless you have become familiar with the structure of the document.</p>	
<p><i>Changes proposed, if any</i></p> <p>The final agreed London Plan must be better designed – shorter and lighter, and physically robust. It must be easy to navigate and a pleasure to read.</p>	
<p><i>Why propose these changes?</i></p> <p>To preserve the sanity of the Plan’s users.</p> <p>To help secure the implementation of the Plan. The London Plan’s statutory relationship with the boroughs’ unitary development plans obliges to be easily navigable.</p>	

<p>London Assembly rep. 28</p>	<p><i>Draft London Plan chapter/section/paragraph/policy</i></p> <p>SDS Technical Reports</p>
<p><i>Objecting or supporting representation?</i></p> <p>Objecting</p>	
<p><i>Grounds for representation</i></p> <p>At the start of the London Plan public consultation period (21 June 2002), only seven of the indicated 19 SDS Technical Reports had been published. Three more were released in July, a further seven in August, and at the time of writing, the remaining two – although dated August 2002 – are stuck at the printers with only a week to go before the close of the consultation period.</p> <p>In the Assembly’s view, this drip feed of supporting documentation has restricted Londoners’ ability to respond meaningfully to the Mayor’s consultation on the London Plan.</p>	
<p><i>Changes proposed, if any</i></p> <p>The Mayor should have ensured that all supporting documentation was ready in time for public consultation on the Plan.</p>	
<p><i>Why propose these changes?</i></p> <p>In the interest of meaningful consultation on the London Plan.</p>	

Annex A: Evidence

Witnesses

The following witnesses appeared before evidentiary hearings of the Planning and Spatial Development Committee:

18 July 2002

Ken Livingstone – Mayor of London

Eleanor Young – Mayor’s Policy Adviser (Planning)

Nicky Gavron – Deputy Mayor of London and Mayor’s Advisory Cabinet Member (Spatial Development and Strategic Planning)

17 September 2002

Cllr Philip Portwood (LB Ealing) – Chair of Association of London Government Transport and Environment Committee (ALG TEC)

Cllr Bridget Fox (LB Islington) – Vice-Chair, ALG TEC

Cllr Charles Walker (LB Wandsworth) – ALG TEC

Archie Galloway (Corporation of London) – ALG TEC

Nick Lester – Director Transport and Environment ALG

Martin Simmons – Planning Consultant to the ALG

Roger Chapman – Planning Policy Officer ALG

Tim Chapman – Planning Policy Officer ALG

Ken Livingstone – Mayor of London

Eleanor Young – Mayor’s Policy Adviser (Planning)

Nicky Gavron – Deputy Mayor of London and Mayor’s Advisory Cabinet Member (Spatial Development and Strategic Planning)

Greg Clark – Director of Strategy, Development and Intelligence, London Development Agency (LDA)

Anne Crane – LDA

Dr Marc Stephens – LDA

Written Evidence

Written evidence was received from the following organisations:

The Association of London Government (ALG)

The London Development Agency (LDA)

Annex B: Orders and translations

For further information on this report or to order a bound copy, please contact:

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ਜੇ ਤੁਸੀਂ ਜਾਂ ਕੋਈ ਤੁਹਾਡਾ ਜਾਣ-ਪਛਾਣ ਵਾਲਾ ਇਸ ਰਿਪੋਰਟ ਦਾ ਅਗਨੈਕਟਿਵ ਖੁਲਾਸਾ ਅਤੇ ਸੁਝਾਵਾਂ ਦੀ ਨਕਲ ਵੱਡੇ ਅੱਖਰਾਂ ਵਿਚ, ਬ੍ਰੇਅਲ ਵਿਚ ਜਾਂ ਆਪਣੀ ਭਾਸ਼ਾ ਵਿਚ ਮੁਫਤ ਪ੍ਰਾਪਤ ਕਰਨਾ ਚੁੱਕਦਾ ਹੈ ਤਾਂ ਕਿ੍ਪਾ ਕਰਕੇ ਸਾਡੇ ਨਾਲ 020 7983 4100 ਤੇ ਟੈਲੀਫੋਨ ਰਾਹੀਂ ਸੰਪਰਕ ਕਰੋ ਜਾਂ assembly.translations@london.gov.uk ਤੇ ਸਾਨੂੰ ਈ-ਮੇਲ ਕਰੋ।

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Haddii adiga, ama qof aad taqaanid, uu doonaayo inuu ku helo koobi ah warbixinta oo kooban iyo talooyinka far waaweyn ama farta qofka indhaha la' loogu talagalay, ama luuqadooda, oo bilaash u ah, fadlan nagala soo xiriir telefoonkan 020 7983 4100 ama email-ka cinwaanku yahay assembly.translations@london.gov.uk

Annex C: Scrutiny principles

The powers of the London Assembly include power to investigate and report on decisions and actions of the Mayor, or on matters relating to the principal purposes of the Greater London Authority, and on any other matters which the Assembly considers to be of importance to Londoners. In the conduct of scrutiny and investigation the Assembly abides by a number of principles.

Scrutinies:

- €# aim to recommend action to achieve improvements;
- €# are conducted with objectivity and independence;
- €# examine all aspects of the Mayor's strategies;
- €# consult widely, having regard to issues of timeliness and cost;
- €# are conducted in a constructive and positive manner; and
- €# are conducted with an awareness of the need to spend taxpayers money wisely and well.

More information about the scrutiny work of the London Assembly, including published reports, details of committee meetings and contact information, can be found on the London Assembly website at <http://www.london.gov.uk/approot/assembly/index.jsp>

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