London in its Regional Setting

A report by the London Assembly’s Planning & Spatial Development Committee

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Chair’s foreword

The London Plan is due to be published soon in its final form. Since 2001, the London Assembly has been monitoring it closely. At each stage of the Plan’s preparation we have listened to the views of Londoners, and have submitted on their behalf responses to the Mayor, both supportive and critical. Our aim throughout has been to make sure the Mayor is held to his promise that the Plan will deliver an exemplary sustainable London.

A significant proportion of the capital’s workforce lives outside London and commutes in every day, yet we found that the London Plan had little to say about the capital’s linkages and relationships with its hinterland. A constant thread running through our comments has been that the London Plan has been essentially inward looking. In short, the Plan, in our view, did not say enough about the role of London in its regional setting.

Along with our regional partners – the East of England and the South East – this was one of the many matters we put to the Plan’s Examination in Public last Spring. And the Government-appointed Inspectors appeared to agree with us, recommending in their report to the Mayor, that the Plan should demonstrate a greater commitment to regional planning co-ordination.

Drawing on advice from witnesses to our scrutiny committee meetings, our report sketches out the main dimensions of the relationships between London and its two regional partners – population, households and housing, employment and labour markets, transport and commuting – and focuses on the administrative arrangements for co-ordinating planning across the Greater South East.

We offer a number of positive suggestions for how the role of the co-ordinating body – the Advisory Forum on Regional Planning for London, the South East and the East of England – could be strengthened to address more effectively any inter-regional discrepancies in provision for housing, employment and transport over the coming years.

I would like to thank Naomi Rhodes and Helen Absalom from our technical consultants ERM Planning, my colleagues on the Assembly’s Planning and Spatial Development Committee, and the many distinguished individuals and representatives of organisations who attended our scrutiny meetings and gave us the benefit of their experience and expert advice.

Bob Neill
Chair of the Planning and Spatial Development Committee
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 London Assembly of its committee structure. It is one of eight Committees that between them cover the range of policy areas relevant to London government. The membership of the Committee, agreed in May 2003, is:

- Bob Neill (Chair) Conservative
- Sally Hamwee (Deputy Chair) Liberal Democrat
- Tony Arbour Conservative
- Len Duvall Labour
- Noel Lynch Green
- Val Shawcross Labour

Terms of reference

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 London
   as 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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Executive summary

London has a close and complex relationship with its surrounding regions – the East of England and the South East. A fifth of the capital’s employees live outside London, commuting daily to work in town. From this fact alone stems a requirement that the planning policies and proposals for housing, jobs and transport of London and its two regional neighbours – the East of England and the South East – are consistent and share the same vision.

The London Assembly’s Planning and Spatial Development Committee’s scrutiny of London in its regional setting:

- sketches out the main dimensions of the relationship between London and its two regional partners – population, households and housing, employment, labour markets and commuting
- considers the degree to which the Mayor’s emerging London Plan tackles these issues appropriately, and
- looks at the administrative arrangements for co-ordinating planning between the three regional partners, and how these could be strengthened.

We looked in some detail at the workings of the Advisory Forum on Regional Planning for London, the South East and the East of England. We advocate some strengthening of the Advisory Forum as part of its current evolution. We also consider that, once all three regional planning bodies have produced their first regional spatial strategies, there would be benefits if the Advisory Forum took on a wider remit and developed a more pro-active role in the formulation of aspects of joint strategy.

To support this expanded role, we conclude that the Advisory Forum should have a small, dedicated secretariat, providing continuity of support and organising regular conferences for the Advisory Forum and its regional stakeholders.

We believe that our proposed modest strengthening of the Advisory Forum will enable any inter-regional discrepancies in provision for housing, employment and transport to be more effectively addressed.
1 Introduction

1.1 This is the report by the London Assembly’s Planning and Spatial Development Committee on its scrutiny of London in its Regional Setting. It draws on discussions held at three evidentiary hearings held by the Committee in June and July 2003, supported by written evidence produced for those hearings, and the support and advice of our technical consultants ERM.

1.2 The scrutiny examined the implications for the draft London Plan of the relationship between London and its surrounding regions, and the institutional arrangements which are in place to facilitate co-ordinated planning (or at very least coherent spatial development strategies) across the three planning regions of London, the South East of England and the East of England.

1.3 The Scrutiny was held after the Examination in Public (EIP) on the draft London Plan, but prior to the publication of the EIP Panel’s Report to the Mayor in July 2003. Many of the experts who attended our evidentiary hearings had previously submitted evidence to the EIP and this was reviewed alongside written evidence provided directly to us as part the scrutiny. We discuss in this report issues raised at the EIP and the EIP Panel’s findings, where these are relevant to the Scrutiny.

London Assembly scrutiny of the Mayor’s draft London Plan

1.4 This scrutiny was initiated in response to our concern that the draft London Plan had not fully considered London’s regional context, most particularly the relationship with the adjoining regions. Back in May 2001, the Mayor set out his aspirations for the Plan’s handling of London’s relationships with its regional neighbours:

London has a close and complex relationship with its surrounding regions. A fifth of the capital’s employees live outside London. The London Plan will be set in a regional context, which recognises the labour market and other economic linkages between London and its neighbours, including those on continental Europe. Policies to enhance the attractiveness to business of a range of locations, especially in existing town centres and larger sites in regeneration areas and regional corridors, will help reduce the pressures of longer distance commuting on its transport system. The London Plan will take due regard for London’s neighbours, to ensure that both problems and opportunities are shared and resolved to the benefit of the region as a whole.

1.5 In the London Assembly’s scrutiny of Towards the London Plan, we found that it had little to say about the role of London in its region. We supported the Royal Town Planning Institute’s call for London to strike up a number of

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4 Ibid, page 29, para 2.31
6 Ibid, paragraph 2.42
strategic partnerships with the South East, and the Government, to ensure the Plan’s delivery. We called upon the draft London Plan (the next stage in the Plan’s preparation) to take more account of London’s hinterland as a significant proportion of its workforce travels into the city very day from the surrounding South East. And we stated that a strategy for London which was not validated in detail against other spatial strategies in adjoining regions would fail. We concluded that Towards the London Plan concentrated on too narrow a vision of London’s relationship with its external partners. In our view, the Plan should go on to facilitate the development of two-way partnerships between London and its neighbouring regions.

1.6 In June 2002, the Mayor published the draft London Plan. In our scrutiny report on it, we found that there was still a requirement for the Plan to say much more about London’s linkages and relationships with its surrounding regions. In our view, the Plan remained essentially inward looking, and did not reflect adequately the strong interdependence between London and the rest of the South East.

Scrutiny of London in its regional setting

1.7 This scrutiny’s terms of reference, agreed on 8 April 2003, were to:
- assess the relationships and linkages between London and its adjoining regions, in terms of migration flows, jobs, investment, housing, transport and environmental impacts
- assess the compatibility of the emerging planning strategies of the two regions and London, both locally (between Outer London and bordering districts), and regionally
- review the effectiveness of the new regional planning arrangements
- make appropriate recommendations to the Mayor, the Regions and Government.

1.8 Our first two evidentiary hearings, held on 3 and 17 June 2003, discussed the following inter-regional policy topics: employment, labour markets and commuting; households and housing; waste, freight and airports. Our third hearing on 8 July 2003 focused on the inter-regional planning arrangements and whether and how these should be strengthened.

1.9 In this report we draw on points raised by witnesses at the evidentiary hearings and written evidence submitted to us. The list of witnesses attending each of the hearings is presented in Annex B. Those individuals and organisations that submitted written evidence are listed in Annex C. Other references used in this report are quoted in the footnotes.

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7 ibid, paragraph 3.5
8 ibid, paragraph 3.8
9 ibid, paragraph 3.11
10 ibid, recommendation 7
11 Behind the London Plan, the response of the London Assembly to the Mayor’s draft London Plan, November 2002 (the London Assembly’s draft London Plan EIP submissions) http://www.london.gov.uk/assembly/reports/plansd.jsp
12 ibid, London Assembly EIP representation B
2 Regional planning arrangements in the Greater South East

Regional planning reorganisation

2.1 Prior to April 2000, regional planning in the South East was co-ordinated by SERPLAN (the South East Region Regional Planning Conference).

2.2 The old South East region encompassed the county areas of Berkshire, Buckinghamshire, Hampshire, Oxfordshire, the Isle of Wight, East and West Sussex, Surrey, Kent, Greater London, Bedfordshire, Essex and Hertfordshire – a wide area encircling and including London, stretching from Oxford to Dover, and from Southampton to Colchester (see Figure 1).

2.3 Under these arrangements, SERPLAN’s small officer secretariat produced RPG9: Regional Planning Guidance for the South East. This was reviewed and eventually published by the Government in March 2001.

Figure 1

Old planning regions
(before April 2000)

- East Anglia Region
- South East Region
2.4 In April 2000, the former RPG9 South East Region was split for regional planning purposes into three components (see Figure 2):

- a new East of England Region (comprising the former East Anglian Region plus Essex, Hertfordshire, Bedfordshire)
- Greater London, and
- a reconfigured South East Region (the original South East, minus London, Essex, Hertfordshire, Bedfordshire).

For the purpose of this report, London, the East of England and the South East regions are referred to as the Greater South East.

Figure 2

New planning regions
(since April 2000)

- East of England Region
- Greater London
- South East Region

2.5 The three Regional Planning Bodies under these new planning arrangements are:

- the East of England Regional Assembly (EERA) (*formerly the East of England Local Government Conference – EELGC*)
- the Mayor of London, and
- the South East of England Regional Assembly (SEERA).

2.6 These three bodies came together in 2000 to establish the Advisory Forum on Regional Planning for London, the South East and the East of England (also
known as the Pan-Regional Advisory Forum or the Inter-Regional Advisory Forum). The Advisory Forum was set up to facilitate the production of coherent spatial strategies under these new administrative arrangements. RPG9 stands until each of the three new planning bodies produce their own planning strategies.

2.7 The workings of the Advisory Forum are discussed in detail in Chapter 6 of this report.

The Mayor’s regional planning responsibilities

2.8 The Greater London Authority Act 1999 sets out the Mayor’s regional planning responsibilities. These are:

- to consult neighbouring authorities on the draft London Plan (S.335 (3c))
- to make sure the London Plan is consistent with neighbouring regional planning guidance (if the Secretary of State thinks it is, he or she may direct the Mayor not to publish the London Plan until it is suitably modified – S.337 (6a, 7a and 8))
- to make sure the London Plan is not detrimental to the interests of an area outside Greater London (again, the Secretary of State may direct – S.337 (6b, 7b and 8))
- to keep under review matters relating to local planning authority areas outside London which might affect the planning of London’s development or are relevant to the London Plan (S.339 (1))
- to have regard to regional planning guidance for areas adjoining London (S.342 (1a))
- to inform neighbouring planning authorities, and bodies on which they are represented, of his views on matters relating to the planning or development of London or the neighbouring areas (S.348 (1) and (2))
- to contribute to the expenses of bodies dealing with the above issues at which the GLA is represented (S.348 (4))

2.9 GOL Circular 1/2000 (Strategic Planning in London) interprets these responsibilities as follows:

The Act requires the Mayor to represent the planning interests of London in discussions about broader regional planning matters. He or she may also represent London’s views externally on other matters of common interest concerning the planning and development of areas within or in the vicinity of Greater London. The Mayor is required to consult the boroughs from time to time about the exercise of this function.\(^\text{13}\)

Future reviews of RPG9 will be carried out by the new Regional Planning Bodies for the South East and East of England regions and the Mayor. The Mayor should take an active role on behalf role of London in liaising with the regional planning bodies for neighbouring regions in order to secure consistency and coherence between the SDS and RPGs for neighbouring regions and in seeking co-ordination on strategic planning matters of importance to the broader south east area.\(^\text{14}\)

\(^\text{13}\) Strategic Planning in London, GOL Circular 1/2000, para 7.1
\(^\text{14}\) Strategic Planning in London, GOL Circular 1/2000, para 7.2
3 The London Plan in its regional context

3.1 At the Examination in Public (EIP) into the draft London Plan, the Panel received submissions from London’s two regional partners:

- the South East of England Regional Assembly (SEERA),
- the East of England Local Government Conference (EELGC) together with the East of England Development Agency (EEDA). (The EELGC has since evolved into the East of England Regional Assembly (EERA).

The view from the South East

3.2 SEERA’s response focused on:

- the difference between the minimum target of 23,000 new homes per annum and the higher estimates of need
- the extent to which the rate of employment growth in the draft London Plan would put pressures on the surrounding regions, particularly given the lower rate of growth of London’s labour force
- the lack of clarity on the role envisaged for the western and eastern regeneration corridors and the actions that should be taken for these to fulfil their potential
- the limited attention paid by the Plan to the close and complex relationships with adjoining regions, and
- the reliability of data used by the GLA to project commuting figures.

SEERA stated its intention to work with the GLA and EERA through the Advisory Forum once data becomes available from the 2001 Census.

The view from the East

3.3 EELGC, in its representations to the EIP, made stronger objections to the way the Plan had evolved, stating that:

*It is regrettable that the economic growth aspirations in the emerging LDP have not been informed by a consistent and jointly agreed analysis of future labour supply and demand in London and the adjacent regions, and the implications for inter-regional commuting and transportation investment priorities, however, joint working is seeking to rectify this.*

3.4 EELGC argued that:

- greater emphasis should be given to inter-regional relationships
- the Plan should recognise the risks of transport congestion and additional housing pressures in adjoining regions if aspirations regarding housing development, the reduction in unemployment and closure of the skills gap are not recognised, and
- the Plan should not endorse a labour supply/ labour demand projection but instead should commit to joint working through the Advisory Planning Framework.

It recommended that the GLA and the three development agencies (LDA, EEDA and SEEDA) should agree a scale of future employment appropriate for the three regions.
3.5 EEDA’s response highlighted the interdependency between the East of England, London and the South East, describing them as forming part of a larger metropolitan economic area. It noted the findings of GLA Economics’ paper on Labour Market Balances\textsuperscript{15} and the fact that further work would need to be done when Census information became available.

**The EIP Panel’s findings**

3.6 The commitment to joint research through the Advisory Forum was made by the three regions in discussions held prior to the EIP. This approach was endorsed by the Panel which felt that the Mayor and neighbouring regional planning bodies should explore and monitor inter-regional relationships more fully, particularly at the sub-regional level. In its report to the Mayor, the EIP Panel recommended Recommendation R1.11 stated that:

*The terms of reference for Sub-Regional Development Frameworks (SRDFs) should make explicit reference to relationships with adjoining areas across the regional boundary. SRDF partnerships should include appropriate representation from those areas.*\textsuperscript{16}

3.7 The EIP Panel further recommended that:

*The Plan should include an explanatory section of how it will be co-ordinated with the emerging regional spatial strategies for the South East and East of England regions. This could refer to the Mayor’s commitment to strengthen inter-regional collaboration on journeys to work, labour market and skills and housing issues.*\textsuperscript{17}

3.8 The Panel recommends a number of other changes to the draft London Plan relevant to our scrutiny. These are including in the following chapters, as relevant to the debates held at the evidentiary hearings.

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\textsuperscript{15} Labour Market Balances in London and the Wider South East, GLA Economics, February 2003

\textsuperscript{16} EIP Panel Report, July 2003, recommendation R1.11

\textsuperscript{17} EIP Panel Report, recommendation R1.12
4 Population, households and housing

4.1 The EIP included a thorough debate of all aspects of housing in the draft London Plan, including:
- the estimates of need and the difference between this and targets
- housing densities
- affordable housing targets, and
- the new emphasis on intermediate housing.

4.2 SEERA and others requested at the EIP that urgent steps be taken to reduce the gap between the estimated provision in the draft London Plan of 23,000 new homes per annum and the assessed need for some 31,900 dwellings per annum. Failure to increase provision could add to the demand for housing in the South East, they argued, especially if provisions for employment growth are not moderated.

4.3 Many of these issues were revisited at our evidentiary hearings, with a particular emphasis on the implications of the draft London Plan policies on the surrounding regions and the steps being taken, and needing to be taken, to strengthen collaboration between the three regional bodies.

Household growth and housing provision

4.4 Professor Christine Whitehead of the LSE gave evidence\(^{18}\) of the disparity that has arisen between population and housing needs and the provision for new housing, both in the London Plan itself and across the Greater South East. The shortfall is manifest both in the discrepancy between need estimates and housing provision targets (clearly evident in the draft London Plan and the RPG9 area) and between targets and actual levels of provision (evident in the South East and arguably in London).

4.5 The discrepancy between need and target provision in the draft London Plan is particularly worrying, argued Chris Holmes\(^{19}\), because there are no policies which address the difference. He urged that this be addressed with the surrounding regions.

4.6 We note, however, that the Panel has subsequently recommended that the Mayor seeks the maximum provision of additional housing in London towards achieving an output of 30,000 additional homes per annum from all sources\(^{20}\). This would bring the housing target into line with estimates of housing need that include the housing backlog.

4.7 Professor Christine Whitehead reported that massive changes in behaviour would have to be achieved for London’s projected household numbers to be accommodated within its boundary. It would mean living at higher densities and paying more for less space as well as housing suppliers providing far greater levels of output in London than they are currently. There is a significant net

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\(^{18}\) Evidentiary Hearing 3 June 2003
\(^{19}\) Evidentiary Hearing 17 June 2003
\(^{20}\) EIP Panel Report, recommendation R4.3
movement of young people into London from the surrounding regions, she told us, combined with outward pressure from London for housing by couples and especially families. This is a long established trend that can be expected to continue. It reflects lifestyle choices, rather than simply an under provision of housing21.

4.8 The GLA understands that it is the movement from London to the South East and the East of England that keeps these regions’ populations growing. It expects this to be verified in a forthcoming review of the 2001 Census data and the latest London Household Survey. This will be presented to the London Housing Board and will feed into its discussions with the other two regions. The Panel recommended that the Mayor should continue to work in close collaboration with the South East and East of England Regional Planning Bodies to ensure that inter-regional issues concerning migration are dealt with consistently22.

4.9 The Panel also recommends that Objective 1 of the Plan should be redrafted, recognising that the overriding theme of this Objective is ‘to accommodate London’s growth within its own boundaries without encroaching on its green spaces’23.

4.10 The TCPA welcomed the Communities Plan24 as a positive approach to planning to meet needs across the wider region. It requires significant investment in new infrastructure and Government should, it argued, consider tapping into the increase in land values delivered through the planning process in this way. London First argued that planning gain cannot possibly deliver the sorts of monies needed to provide the necessary infrastructure.

4.11 We question whether Objective 1 of the Plan (“Making the most sustainable and efficient use of space in London; encouraging intensification and growth in areas of need and opportunity”25) is realistic, noting evidence presented to us that net out-migration from London to the South East and East of England Regions is inevitable and that it is only this which stops these regions from having declining populations.

4.12 We recognise, however, that this question can only be answered by a close look at the recent Census data and support the proposals made by the three regional planning bodies, endorsed at the EIP, to review the data jointly.

**Recommendation 1**

*We support proposals made by the three regional planning bodies, endorsed at the EIP, to review Census data jointly.*

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21 Evidentiary Hearing 17 June 2003. All references quoted below are from this second evidentiary hearing unless otherwise indicated.

22 EIP Panel Report, recommendation R4.2

23 EIP Panel Report, paragraph 8.40 and recommendation 8.11

24 Sustainable Communities: Building for the Future, ODPM, 2003

25 draft London Plan, page 7
Housing density

4.13 The GLA argued that the concern of some witnesses that the draft London Plan’s density policies might encourage people to move out to neighbouring regions are unfounded because even at 30,000 new dwellings per year, these policies will only impact on 1% of the existing stock. This means that overall the density of housing will only increase very slowly.

4.14 We consider the density framework set out in the draft London Plan to be appropriate for London provided it is applied with sensitivity to local contexts.

Regional Housing Boards

4.15 The Committee welcomes the new Regional Housing Boards as a positive step towards devolution of decisions on housing investment. The GLA stated that the Regional Housing Strategies are at a relatively formative stage but when established will facilitate inter-regional collaboration, especially because the Government has announced that funding for London, the South East and the East of England Regional Housing Boards will come from the same pot. It also stressed, however, that the Regional Housing Strategies should go through proper consultation and be ‘owned’ within their respective regions.

4.16 At an inter-regional level, the important points are that the three Housing Boards talk strategically on a regular basis to ensure that adequate provision is being planned for and that there are no discrepancies between the Regional Housing Strategies, and that silly decisions determined by relatively arbitrary boundaries are avoided.

4.17 The East of England Regional Housing Strategy recognises sub-regional differences and those parts of the region that have strong relationships with London. In the South East, the forthcoming review of the Strategy will take greater account of sub-regional differences and address relationships with London more fully.

4.18 The Advisory Forum has agreed to provide an overview of the three Regional Housing Strategies.

Recommendation 2

We support the Advisory Forum’s decision to take an overview of housing need and provision across the Greater South East.

Affordable housing

4.19 The Committee acknowledges the danger of not recognising the scale of the housing affordability problem across the Greater South East. Chris Holmes, Visiting Research Fellow at the Institute of Public Policy Research, recommended that the collaboration between the three regions through the Advisory Forum should include all members reviewing their contribution to meeting affordable housing needs across the wider region.

4.20 He pointed out that some groups, particularly those in social rented housing, do not have the choice of moving out of London. Many of those who would
welcome an opportunity to relocate are older people whose families have moved out. Their London accommodation would better serve key worker housing needs, if only such transfers could be arranged. He therefore advocated the creation of a Regional Housing Executive, linked to the Regional Housing Boards, to look at helping people in social rented accommodation to move out of London.

SEERA and EERA gave evidence that densities and affordable housing targets were increasing across the South East and East of England leading to greater quantities of affordable housing being delivered.

**Recommendation 3**

We recommend that the Mayor should work with the surrounding regions to ensure that all possible steps are taken to meet affordable housing needs arising within London and across the wider region. This should include a consideration of a new Regional Housing Executive (or other arrangements) to assist those in social rented housing, who wish to do so, to move out of London to the neighbouring regions.
5 Employment, labour markets and commuting

The need for collaboration

5.1 Our evidentiary hearings explored whether the draft London Plan had taken sufficient account of the relationship between London and the surrounding regions in its housing, employment and transport proposals, and, related to this, whether it was facilitating a pattern of development that would be served by a sustainable transport system.

5.2 Professor Ian Gordon from the London School of Economics (LSE)\(^{26}\) broadly described the extent of the area that functioned as one metropolitan region\(^{27}\). He then outlined three concerns that arise if the area is not planned as a functional whole, namely:

- an under provision of housing
- a failure to exploit the metropolitan region’s economic potential, and
- a tendency to see deprivation and inequality spatially, rather than socially.

In his view, the last two of these could lead to a competitive attitude between the regions that would not be good for the wealth of the region as a whole or for social justice and equity within it.

5.3 The GLA stated that the draft London Plan had not been produced in a regional vacuum, but that the GLA, EERA and SEERA acknowledged that more needed to be done to understand the relationships between the three areas. This had been acknowledged at the EIP and had resulted in the agreed joint work programme.

5.4 We agree that competition can only be avoided by greater collaboration between the three regions.

The scale of employment growth and the implications for commuting

5.5 London First\(^{28}\) stated that they considered that the employment projections in the draft London Plan were ‘reasonable and robust’, but expressed concerns that this level of employment growth could place pressures on labour and housing markets in the surrounding regions.

5.6 The GLA has considered the implications of employment growth on the surrounding regions, as reported in its paper Labour Market Balances\(^{29}\). This was produced in response to concerns raised before the EIP, particularly by the surrounding regions, that the increase in employment over the increase in labour force could lead to an extra 120,000 people commuting into London daily by 2016.

\(^{26}\) Evidentiary Hearing 3 June 2003
\(^{27}\) In their written evidence, Professors Ian Gordon and Christine Whitehead stated that while attempts at definition are inevitably a bit arbitrary, since there is no clearly defined outer edge, the most rigorous and up-to-date delineation of the functional region, undertaken for the EU’s comparative GEMACAI study includes a territory stretching from Reading to Southend and Medway, and from Stevenage to Horsham. This area has some 6.5 million jobs, 40% of them outside Greater London (Cheshire and Gornostaeva, 2002).
\(^{28}\) This and subsequent comments were raised in the first evidentiary hearing on 3 June 2003 unless otherwise stated.
\(^{29}\) Labour Market Balances in London and the wider South East, GLA Economics, February 2003
5.7 Transport for London (TfL) stated that the provisions referred to in the Plan would lead to an additional capacity of around 160,000 seats on National Rail-type services entering London in the morning and evening peak periods suggesting that the plan’s employment and transport strategies were consistent.

5.8 The GLA’s Labour Market Balances paper shows that the number of commuters as a share of employment in London has declined in recent years as more jobs have been filled by people living within London. Whilst the paper therefore postulated that commuting might even decrease in an absolute sense over the coming years, the weakness of the data led to the recommendation that it was best to assume that commuting would remain a constant share of employment.

5.9 GLA Economics conceded, however, that capacity constraints had restricted the growth of commuters in recent years and that the additional capacity that will be provided by Crossrail, Thameslink 2000 and other new services outlined in the Plan could be taken up very quickly. The Corporation of London maintained that the delivery of Crossrail and resulting increase in commuting capacity would be essential for the City to expand as outlined in the Plan.

5.10 The GLA reported that the draft London Plan has dealt with potential pressures on the surrounding region by encouraging the up-skilling of Londoners, focusing growth on Eastern and Central London with new infrastructure to support that, and providing additional transport capacity within and around London. The EIP Panel recommended that the Plan should place even greater emphasis on skills and local access improvements to enable Londoners to fulfil the new jobs (R2.8 and R8.11).

5.11 The Committee agrees that opportunities for Londoners to take up employment opportunities within the capital should be maximised by investment in training and local access improvements.

Recommendation 4

We reiterate our call to the Mayor for investment in training and local access improvements to maximise Londoners’ opportunities to take up employment opportunities within the capital.

Concentrated or dispersed development?

5.12 Witnesses were questioned on whether the Plan concentrated too much on growth of the Central Area to the detriment of communities on the edge of London – a view held by the London Assembly and presented to the EIP in its own submissions.30

5.13 The concentrated pattern of growth sought in the draft London Plan was defended by GLA Economics and London First as reflecting the dynamics of business (although we note the heavy influence of “development capacity” in the distribution of economic growth). Furthermore, GLA Economics argued that

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30 Behind the London Plan, the response of the London Assembly to the Mayor’s draft London Plan, November 2002 (the London Assembly’s draft London Plan EIP submissions) http://www.london.gov.uk/assembly/reports/plansd.jsp
a more dispersed pattern of growth could not be so well served by public transport, even if it could be achieved economically.

5.14 Long distance commuting to the centre of London was defended on the grounds that it enabled business to draw on a wide pool of labour, gave employees a broad lifestyle choice and helped the employment catchment area of the City to absorb shocks in the labour market. The EIP Panel noted, however, that TfL’s analysis presented at the EIP shows that the Plan would lead to an increase in the propensity to travel and questioned whether this was sustainable\(^{31}\).

5.15 It seems logical to the Committee that a concentration of employment in Central London maximises the potential for trips to be made by public transport, but this reinforces the question of whether there is sufficient public transport capacity for the potential to be realised.

5.16 Two thirds of the proposed additional public transport capacity is dependent on the three major schemes of Crossrail 1 and 2 and Thameslink 2000 for which the draft London Plan acknowledges that the “original timescales cannot all be achieved”\(^{32}\). EERA gave evidence to the Scrutiny that the SRA had diverted funds for new lines and service upgrades to maintenance and repairs.

5.17 We note that the EIP Panel has requested that the Plan sets out the phasing of new transport capacity and distinguishes between those schemes that the Mayor can deliver, and have a high degree of certainty, and those which are outside his control\(^{33}\).

**Recommendation 5**

To maximise the use of public transport across the Greater South East, we recommend that the three regional planning bodies liaise to call jointly for the realisation of heavy rail investment projects in the shortest realistic timeframe.

5.18 Peter Headicar agreed that a concentration of employment in Central London served by public transport was an important element of the strategy but questioned whether it should assume the dominance that it does in the draft London Plan. The alternative would be for a greater proportion of future employment to be planned for in suburban centres both in and outside the GLA boundary\(^{34}\).

5.19 With the expected delay in the delivery of heavy rail schemes, it is likely, he argued, that the development market itself will respond by giving greater attention to non-central alternatives. Indeed, the Panel has now recommended

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\(^{31}\) The Panel noted that the Plan has not addressed the influence the chosen strategy will have on travel behaviour, and whether it would be more sustainable in this respect than alternatives and notes that the increased propensity to travel does not meet with national policy guidance (para 1.30). It recommends that the Mayor should work with TfL and others to seek to reduce the need for travel (R5.1).

\(^{32}\) Draft London Plan paragraph 2A38.

\(^{33}\) EIP Panel report, recommendation R5.9

\(^{34}\) Evidentiary Hearing 3 June 2003 and Further Comments on Commuting Implications of the draft London Plan’s Employment Strategy, submitted as written evidence, June 2003
that the Plan should do more to support the realisation of job opportunities across London and place a stronger emphasis on promoting London’s polycentric development\textsuperscript{35}. We strongly support this Panel recommendation.

**Recommendation 6**

We welcome the EIP Panel’s recommendation that the London Plan should place greater emphasis on promoting London’s polycentric development.

**Sustainable transport in Outer London**

5.20 It was debated whether enough was being done to encourage sustainable travel patterns to centres in Outer London and outside London, particularly on journeys that follow orbital routes\textsuperscript{36}. The draft London Plan and the Mayor’s Transport Strategy\textsuperscript{37} has aimed to do this by strengthening bus services between Outer London centres and across the Greater London boundary, and also by promoting a limited number of new tram lines.

5.21 These are now particularly important, argued Peter Headicar, given the recent Government announcement to widen the M25. This increase in road capacity should be accompanied by user charging or other form of demand management (such as better public transport) to prevent the additional capacity being swallowed up within a few years by induced traffic.

5.22 He urged the Advisory Forum to consider the recommendations of the **ORB\textsuperscript{38}IT Multi-Modal Study of the M25** to develop a pattern of hubs and spokes of public transport around the M25, with services consisting of rail (where the facility exists) or road-based services such as coaches and buses. Integral to these proposals are improvements to ticketing, real-time information etc. to ease travelling and measures to overcome the significant institutional barriers that exist under present arrangements.

5.23 These recommendations have been given further weight by the EIP Panel which recommends that the sustainability of transport within and between suburban centres should be improved by enhanced bus services and the greater integration of bus, rail and underground services\textsuperscript{38} (R5.7).

5.24 Echoing these points, SEERA stated that it would welcome support from London to strengthen cross-country rail and bus links, to avoid trips via the capital when travelling from one part of the region to another.

5.25 The hearing discussed the tension between fast long-distance commuter lines and more metro-style services stopping at intermediate centres. The slow deterioration of more local services and the complexities of a system run by a number of different operators were lamented.

\textsuperscript{35} EIP Panel report, recommendation R8.11
\textsuperscript{36} drawing in particular, on the evidence of Peter Headicar, Oxford Brookes University School of Planning, and of David Banister, Stephen Marshall and Helena Titheridge of the Bartlett School of Planning, University College London.
\textsuperscript{37} The Mayor’s Transport Strategy, July 2001
\textsuperscript{38} EIP Panel Report, recommendation R5.7
5.26 TfL stated that they would shortly be reporting on the potential for Park and Ride, which they would be discussing with the neighbouring regions. Witnesses called for a coherent set of parking standards across the wider region, which, like Transport for London’s matrix for London\textsuperscript{39}, should be tailored to achieve realistic modal splits that reflect different levels of public transport accessibility.

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<th>Recommendation 7</th>
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<td><strong>We recommend that more work should be done by the three regional planning bodies and the relevant transport agencies to promote sustainable transport in Outer London and outside London, including:</strong></td>
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<td>• determining the best pattern of services on existing and new routes, and how these could be supplemented with bus and coach services</td>
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<td>• encouraging reverse commuting to utilise existing spare capacity</td>
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<td>• investigating whether user charging should be introduced on orbital routes</td>
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<td>• joint work on Park and Ride, and</td>
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<td>• establishing a coherent set of parking standards for new development.</td>
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\textsuperscript{39} Set out in Annex 4 of the draft London Plan
6 Waste, freight and airports

6.1 A number of other areas were discussed relatively briefly at the evidentiary hearings – waste, freight and airports. Evidence was also presented by witnesses in their written submissions. All of these topics were discussed at greater length at the draft London Plan EIP and recommendations arising from those discussions are made in the Panel Report.

Waste

6.2 SEERA, EERA and London First raised concerns with us over London’s waste management proposals as set out in the draft London Plan and their implications for the regions. They argued that the Mayor has set unrealistic recycling targets for municipal solid waste (MSW) and a presumption against mass-burn incineration. The assumptions in the Plan could potentially enable London to achieve self-sufficiency in waste management, in accordance with government policy, but the recycling targets are not considered realistic in the light of recent trends. They also pointed out that the targets apply only to MSW and not other waste streams.

6.3 EERA gave evidence that the draft London Plan fails to include a policy specifically to make London self-sufficient in managing waste. The high environmental cost of this overspill from London is regretted by the East of England which is taking positive action to manage its own waste. Similarly, SEERA stated in written evidence that its waste strategy for the South East relies on a decline on the export of waste from London to the region, yet there is little to demonstrate that this will be achieved. SEERA is working closely with the GLA to address this.

6.3 To respond to these concerns, and ensure that the Mayor’s policy meets with national guidance, the EIP Panel recommends that:

- the strategic aims of Mayor’s waste policies should include reaching regional self-sufficiency
- the Plan should set out the scale of provision for new recycling, treatment and disposal facilities to meet this objective, and
- the Plan’s presumption against mass burn incineration should be removed.

6.4 We consider the first two EIP Panel recommendations to be appropriate but, in our view, we would wish to see the Plan’s presumption against mass burn incineration upheld.

Freight

6.5 In its written evidence to the Scrutiny, EERA echoes the concerns it raised at the EIP that the draft London Plan and Mayor’s Transport Strategy do not deal adequately with the need for rail freight depots and strategic bypasses.

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40 SEERA re-issued its evidence to the EIP on Waste and Recycling. EERA and London First covered waste in their written submissions.
41 EIP Panel Report recommendation R7.1
42 EIP Panel Report recommendation R7.2
43 EIP Panel Report recommendation R7.6
6.6 Both EERA and London First emphasise that rail/road freight interchanges need to be established on the edge of London, in coordination with the regions, to encourage the transport of freight to London by rail. The TfL London Freight Study is welcomed to address the scant consideration of this matter in the draft London Plan. SEERA made similar comments in its submission to the EIP. It stated that London is a key bottleneck for rail freight movements originating from the gateway ports on the south coast, especially the Channel Tunnel and Dover. A Lower Thames Crossing could provide a freight bypass that would have the added benefit of synergy with the objective of delivering regeneration in the Thames Gateway. It also called for joint consideration of sites for multi-modal interchanges.

6.7 The Panel report acknowledged the brevity of the Plan in relation to freight and recommends that guidance on the number and location of freight terminals and the general locations they are designed to serve is added to the Plan. It also recommends that the Plan supports greater integration of freight transport, between different modes and between major freight interchanges and the centres they serve.

**Recommendation 8**

*We recommend that the Mayor undertakes a full and thorough consultation with the neighbouring regions on the findings of TfL’s freight study, and that the multi-modal freight facilities needed to serve London and the surrounding areas are identified jointly between London and the neighbouring regions.*

**Airports**

6.8 London First called for greater regional collaboration on airport policy. We note, however, that the Advisory Forum has made a joint response to BAA’s position on airport expansion in the South East. We also note the EIP Panel recommendation that provision for airports should be reviewed in the light of the outcome of the current national review of airport capacity. Now that the Government has signalled widespread capacity increases throughout the Greater South East, we suggest the need for policy co-ordination is even greater.

**Recommendation 9**

*We recommend that the Advisory Forum continues to take an active role in the issue of airport capacity across the wider region.*

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44 EIP Panel Report recommendation R5.4
45 EIP Panel Report recommendation R5.7
46 Evidentiary Hearing 17 June 2003
47 EIP Panel Report recommendation R5.8
48 Government announcement on the outcome of its national review of airport capacity, 16 December 2003
The Advisory Forum

7.1 Our final evidentiary hearing focused on the adequacy of the existing inter-regional planning arrangements between London and its surrounding regions, and looked at the effectiveness of the Advisory Forum.

Role and functions of the Advisory Forum

The existing arrangements

7.2 As explained above, the Advisory Forum was set up in 2000 in response to the reorganisation of regional planning responsibilities in the South East that accompanied the establishment of the new GLA.

7.3 The existing protocol that governs the remit of the Advisory Forum was signed by the Mayor, the East of England Local Government Conference and the South East of England Regional Assembly on 7 November 2000.

7.4 The protocol document states that the Advisory Forum was established to “facilitate the consideration of pan-regional matters” and to have an “advisory role”, albeit an “influential” one. This role was defined as “to build consensus and add value to the work of the parties”.

7.5 Martin Simmons, former Chief Planner of LPAC (the London Planning Advisory Committee), reminded us of LPAC’s legacy advice to the incoming Mayor. In a situation of new bodies coming into existence and not wishing to be burdened or compromised in advance by overarching mechanisms or strategy suggestions, the prevailing ethos was for a Forum to:

- have an initial light touch
- be small in size (five members per region)
- debate and collaborate on matters of common interest, and
- facilitate consultation on the individual planning strategies they would soon be preparing.

7.6 The Advisory Forum has no budget, the protocol indicating that each regional body would take turns in providing for its administration. SEERA has carried out his role since the Advisory Forum’s inception. The Mayor has agreed that London’s representation should be himself (represented by the Deputy Mayor), two members from the London Assembly, and two from the Association of London Government (ALG). The latter representation is to address the legislative requirement that the Mayor consults the London boroughs about the exercise of his regional planning responsibilities. The Advisory Forum operates under the subsidiarity principle – that is, matters will only be raised for pan-regional consideration where the desired outcome cannot be achieved by the parties acting separately.

7.7 To examine the degree to which the Advisory Forum is best placed to ensure that strategic matters of importance to the Greater South East – such as housing, commuting and labour markets – are properly co-ordinated and

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49 Protocol for the Advisory Forum on Regional Planning for London, the South East and the East of England, 7 November 2000
50 Martin Simmonds, written evidence 29 April 2003
planned across the three regions, we took evidence from and questioned witnesses about the role and functions of the Advisory Forum, its membership and officer support, and practical issues such as funding and arrangements for a possible secretariat. We also discussed the desirability of a National Spatial Planning Framework which would provide a context within which the Advisory Forum, and its constituent parts, could consider regional and super-regional issues.

Our approach to these issues

7.8 While we consider that the new regional planning arrangements offer some advantages – notably the return of formal strategic planning at the London level – the weight of the evidence presented to us suggests that, from a London perspective, this re-organisation has not been helpful to the planning of the wider London metropolitan area, with its hinterland split between two surrounding regions and no overarching planning mechanism.

7.9 We approached this issue with the view that any measures proposed to strengthen inter-regional planning arrangements should be practical, as opposed to idealistic. Striving for the optimal solution from a functional geographic perspective might involve redrawing the boundaries of the regions that make up the ‘Greater South East’. We consider this to be outside the brief of this particular scrutiny.

7.10 We therefore set out to consider how to strengthen the Advisory Forum. By strengthening the Advisory Forum we believe that inter-regional issues, such as housing, commuting and labour markets, can be better co-ordinated and planned across the three regions.

How effective is the Advisory Forum?

7.11 Martin Simmons argues that the Advisory Forum’s role now needs to be strengthened if the Mayor’s duties to coordinate strategic planning with the regions of the Greater South East are to be fulfilled. Although the Advisory Forum does to some extent fulfil its debating and strategy consultation role, its apparent inability to function as means of enabling constructive dialogue on major inter-regional issues, he argues, suggests serious inadequacies. In support of his case, he cites criticisms of the draft London Plan at the EIP raised by Advisory Forum members – the South East, the East of England, the London Assembly and the ALG. He calls for a comprehensive programme of joint research, and a review of the Advisory Forum’s remit with a view to it having a more active role. This can only be done, he advocates, by an overhaul and formal extension of the protocol.51

7.12 This view is contested by other witnesses. Mike Gwilliam, Director of Planning and Transport for SEERA, argues that whilst it is fair to say that in the earlier stages of the Advisory Forum’s work these issues were inadequately addressed, in part because the Mayor’s office was too focused on intra-London issues, the Advisory Forum has now moved on, with an extensive programme of research being agreed. “The case for significant overhaul and extension”, he says, “is therefore not made. We are clearly evolving”.52

51 Martin Simmonds, written evidence 29 April 2003
52 SEERA, written evidence 27 June 2003
Colin Barnard, consultant for EERA, cautioned further that any changes deemed acceptable to the Advisory Forum membership would need to take account of administrative arrangements (even the current ‘light touch’ imposes a considerable burden on the member body undertaking the secretariat role) and resource availability, and would need to be thoroughly justified.53

Robin Thompson, GLA Policy Adviser on the London Plan, advises that the effectiveness of the Advisory Forum was initially conditioned by a number of factors54:

- All three partners were new bodies faced with major tasks of establishment. Not surprisingly all three have had to prioritise intra-regional matters. In particular, the Mayor has had to produce the London Plan on a fast timescale (which all contributors to the EIP supported) and this has inevitably had some effect on the resources available to service the Advisory Forum.
- The current Regional Planning Guidance for the wider region is a recent and relatively satisfactory form of strategic guidance, so that the immediacy of policy development has perhaps been less than it would have been if such Guidance had not been in place.
- Both the East of England and the South East regions have placed a high priority on developing a sense of regional identity. This is understandable, but it must not result in denial of the reality that both regions are heavily interactive with London.
- Many of the networks and sources of information associated with SERPLAN and the “old” system have been eroded.

Looked at in this context, he argues, the Advisory Forum has begun to achieve some useful work. It has, for example:

- Commissioned work on labour and housing markets and commuting.
- Made joint representations to Ministers on affordable housing.
- Established a group to tackle the difficult problem of waste.
- Agreed in principle to the establishment of a co-ordinated program of monitoring and research.
- Collaborated on strategic transport issues such as airports and ORBIT.

Robin Thompson concludes that most of the matters proposed by Martin Simmons have been considered or are proposed for consideration. He confirmed that significant steps have indeed already been made towards stronger co-operation between the Advisory Forum members. He reported that a particularly positive approach was taken both before and during the EIP (and acknowledged by the Panel), with proposals for a programme of joint research and joint working being developed to take account of emerging Census data.

On 9 May 2003, the Advisory Forum agreed to draw up a joint research programme to consider housing market dynamics, natural resource management and minimisation, and transport issues such as car parking standards, freight

53 EERA, written evidence 7 July 2003
54 GLA, written evidence July 2003
movement and airports\textsuperscript{55}. It also made plans for joint working on next year’s Regional Housing Strategies, and decided to release a joint press statement about the recent airports study (SERAS II) and BAA’s response, and agreed to arrange a joint meeting with the ODPM on the Thames Gateway.

7.18 The Committee welcomes the fact that the Advisory Forum is gaining strength and evolving to fulfil an effective co-ordinating role across the three regions. To achieve greater collaboration, we recommend that the protocol is revisited.

7.19 We acknowledge, however, that the Advisory Forum itself is the appropriate body to consider the extent to which its role should be strengthened and whether this should include a formal revision of its remit. Within that context, we hope that the Advisory Forum will find the recommendations in this report helpful.

\textbf{Recommendation 10}

\textit{To achieve greater inter-regional collaboration, we recommend that the Advisory Forum considers whether its role needs to be formally strengthened, and its protocol revised accordingly.}

\textbf{Research, co-ordination of datasets and monitoring}

7.20 Both at the EIP and at the Scrutiny hearings there was common agreement of the need for the three regions to agree baseline data, and consistent and co-ordinated monitoring programmes. Robin Thompson reported that the research mechanisms being developed in each region should be able to co-ordinate their activities and jointly commission new research relatively easily\textsuperscript{56}.

7.21 The GLA intends to produce an annual monitoring report on the progress of implementing the London Spatial Development Strategy and suggested that similar reports could be prepared for the neighbouring regions.

7.22 The Committee raised a concern over whether the Advisory Forum, under the existing informal arrangements and with no dedicated budget, would be able to commission, manage, absorb and disseminate the programme of research.

7.23 The Committee welcomes the decision to undertake joint research across the three regions. To facilitate this, we urge the three regional planning bodies to make funds available from the spatial planning research budgets. We also recommend that all three regional bodies produce annual monitoring reports. These should presented on a common timeframe, such as calendar years, or financial years, and are therefore all updated at the same time.

\textsuperscript{55} Press release issued by the Advisory Forum on 12 May 2003

\textsuperscript{56} evidentiary hearing 8 July 2003
Recommendation 11

We recommend that SEERA, EERA and the GLA each identify funding to support joint spatial planning research across the three regions, and that they each produce annual monitoring reports on a commonly agreed timeframe.

Articulation and mediation

7.24 The Royal Town Planning Institute (RTPI) supported the call for more inter-regional research and analysis but urged the Committee to look beyond this and consider whether it should be a body with the remit to resolve differences between the strategies of the different bodies\(^{57}\).

7.25 With the RTPI, the Campaign to Protect Rural England (CPRE) outlined how, at very least, the Advisory Forum should articulate commonalities and differences between the three regions and to highlight issues to be resolved in constituent regional spatial strategies\(^{58}\). The RTPI also suggested that in areas where differences exist, the Advisory Forum could take on the role of mediator, helping the parties to resolve or minimise differences.

7.26 Martin Simmons stressed that the creation of an over-arching strategy for the Greater South East was not on the agenda. This would be contrary to the declared roles of the respective bodies, which in the case of the GLA is statutory.

7.27 We agree. Our view is that the articulation and mediation role envisaged for the Advisory Forum will help ensure that strategies are complementary. Once the East of England and South East Regions have produced their own initial regional spatial strategies, the Advisory Forum might consider aspects of joint strategy arising from the joint research programme in subsequent reviews – such as measures to redistribute growth in economic activity to encourage reverse commuting from London.

7.28 The Committee and other witnesses agreed that the Advisory Forum should not be empowered to take executive decisions, questioning the accountability of such an arrangement. The real conundrum lies in finding a way to deal with the policy implications that might arise from joint research in a way that is clearly accountable.

7.29 We urge the Advisory Forum to develop the roles of articulation and mediation outlined above. We believe that, in the longer term, the three regional planning bodies should through the Advisory Forum develop aspects of joint strategy arising from their research. In our view, the indirect accountability provided through the three regional planning bodies, and the Advisory Forum’s strong advisory role, should enable the three regional partners to deal with the policy implications of such work.

\(^{57}\) evidentiary hearing 8 July 2003

\(^{58}\) CPRE written evidence April 2003, and evidentiary hearing 8 July 2003
Recommendation 12

To address commonalities and differences between the three regions and to highlight issues to be resolved in constituent regional spatial strategies, we encourage the Advisory Forum to develop an articulation and mediation role.

Advocacy

7.30 There is clearly a role for the Advisory Forum (demonstrated by existing practice) in speaking with a single voice to Government, the European Commission and other bodies on issues concerning the Greater South East, including the funding and investment plans of Government. The Advisory Forum has already demonstrated the effectiveness of its advocacy powers, for example, in responding jointly to BAA’s position on airport expansion in the Greater South East.

Recommendation 13

We support the recently developed role of the Advisory Forum in speaking with a single voice to Government, the European Commission and other bodies on issues concerning the Greater South East.

Scrutiny

7.31 The RTPI suggested that one of the roles of the Advisory Forum might be to scrutinise the investment plans of public bodies such as the SRA, BAA plc and the health boards, looking in particular at whether or not they support the regional spatial strategies. We support this view.

Recommendation 14

We recommend that the Advisory Forum scrutinises the investment plans of public bodies where there are clear pan-regional implications.

Sub-Regional arrangements

7.33 Martin Simmons outlined the need for a mechanism to be created to consider the different circumstances between parts of London and their adjacent areas and the interplay between the economies of these areas. For example, in what RPC9 refers to as its Western Policy Area, employment growth is very much higher than projections of growth in the labour force, which is leading to an overheated labour market and considerable pressures on land. Within London, there are pockets of low skills and high unemployment, and also an increasing propensity of people from South and West London to commute outwards to job opportunities in the M25 ring of towns and further afield.

7.34 There is already some collaboration between the London Development Agency and the Development Agencies in the neighbouring regions but, it was argued, there needs to be a closer relationship between the RDAs and the Advisory...
Forum if these inter-relationships are to be properly addressed in spatial planning.

7.35 Many of the key issues around spatial planning in the Greater South East are both sub-regional and inter-regional at the same time. All of the four growth areas outlined in the Communities Plan span the administrative regions in some way: the Thames Gateway includes parts of all three regions, the London-Stansted-Cambridge corridor spans London and the East of England, Milton Keynes includes the East, South East and East Midlands regions, and even Ashford, though geographically entirely within the South East region, has fast commuter links to London and is functionally very closely tied to it. There are also important sub-regional and inter-regional issues in connection with the Western Wedge and Western Crescent (in London and the South East respectively) and in the Croydon-Gatwick-Brighton corridor.

7.36 The Committee discussed the issue of the three regions successfully working together to address inter-regional issues themselves, thereby avoiding the need, or perceived need, for the Government to intervene. If the respective regions do not form these sub-regional partnerships there is a risk that Government will step in to fill the void. This has happened, to a degree, with the setting up of the Thames Gateway Strategic Partnership, effectively a government-led task force, as well as the MISC22 Cabinet Committee, chaired by the Prime Minister. It might also result in the Secretary of State using his reserve powers to intervene in regional spatial strategies and the London Plan.

7.37 We note that the EIP Panel recommended that the partnerships set up for the Sub Regional Development Frameworks (SRDFs) under the London Plan should include representatives of the local authorities outside London.

7.38 We believe that each of the major growth areas in the Greater South East should have its own partnership responsible for the strategic planning of that area and we endorse the EIP Panel recommendation that the London Plan SRDFs should be produced in partnership with relevant representatives of the neighbouring regions.

7.40 We recommend that the Advisory Forum should provide the wider regional context within which the strategic planning partnerships for growth areas operate – by ensuring their strategies fit with the wider regional spatial strategies and that there is complementarity between them. A failure to put such a link in place would run the risk of these partnerships being accountable to Government but the existing pan-regional arrangements being bypassed.

**Recommendation 15**
We recommend that the Advisory Forum provide the wider regional context within which strategic planning partnerships in the Greater South East operate.

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60 For example, through Section 337 of the GLA Act 1999
61 draft London Plan EIP Panel Report, July 2003, recommendation R1.11
Membership of the Advisory Forum and officer support

7.41 During the Scrutiny hearings calls were made for the Advisory Forum to embrace the RDAs, Government Offices and other stakeholders, to create a more inclusive inter-regional body. Counter arguments were made to keep it focused and not let it become too cumbersome in its decision making processes.

7.42 It was acknowledged that the three regional assemblies have a Scrutiny function in relation to the strategies of their respective development agencies and that the RDAs do already meet together regularly to discuss areas of mutual interest at the RDA Chair’s Advisory Forum. However, given the necessity for regional economic strategies to tie in with regional and inter-regional planning, the Advisory Forum was considered the appropriate body to take an overview of the relationships between the strategies of the three regional development agencies.

7.43 On housing, the Advisory Forum has already agreed that it will facilitate joint working on Regional Housing Strategies starting from next year.

7.44 We do not consider it appropriate for the RDAs, Government Offices and other regional stakeholders such as the Regional Housing Boards and the Regional Technical Advisory Bodies (Waste) to be members of the Advisory Forum but we do recommend such collaboration as required. This should involve attendance at meetings on an ad hoc basis, when deemed necessary by the Advisory Forum members or secretariat. There should also be effective collaboration with the relevant transport agencies such as the Strategic Rail Authority and Highways Agency.

7.45 There was general support at our third evidentiary hearing for a six monthly or annual stakeholder conference to be hosted by the Advisory Forum. This event would include the three regional planning bodies and representatives of RDAs, housing, health, education and the environment. This would provide a venue for the exchange of ideas and for areas needing to be researched to come into focus. It would also provide a venue for the findings of inter-regional research to be discussed and disseminated.

Recommendation 16

We recommend that the Advisory Forum engages with and reports to stakeholders in an annual (or six monthly) conference.

London representation on the Advisory Forum

7.46 At present the Mayor has allocated two of the five London seats to the Boroughs through the Association of London Government and a further two to the London Assembly. We believe this arrangement is appropriate and should continue.

Officer support

7.47 Our witnesses all argued that the Advisory Forum needs the commitment of more senior officer time from all three regional bodies if it is to fulfil its role.
effectively. Robin Thompson suggested that officer sub-groups be set up to resolve specific issues and then be disbanded, rather than become part of a large decision making machinery.

**Recommendation 17**

We recommend that more senior officer time is dedicated to the Advisory Forum, including the establishment of topical officer sub-groups to resolve specific issues.

**Advisory Forum Secretariat**

7.48 Under the existing arrangements the Advisory Forum operates without a dedicated secretariat. The secretariat role – to be responsible for all administrative and technical matters associated with the effective working of the Advisory Forum – is intended to rotate with the chair. So far the chair and secretariat roles have remained with SEERA since the Advisory Forum was set up in 2000.

7.49 We discussed the benefits of a small dedicated secretariat to support the Advisory Forum at the hearing. It would provide officer input to secure funding, commission, and disseminate the findings of the joint research programme, even if individual project management were delegated to one of the three parties. It would also give continuity of professional input, be more efficient, be independent of the three parties, and able to build up a knowledge base. This knowledge base risks being lost if the secretariat rotates with the chair.

7.50 Robin Thompson suggested that, as an initial development, in advance of SEERA and EERA producing their regional spatial strategies, the secretariat might be just one senior planning professional plus administrative support. Martin Simmons supported this notion as pragmatic in the short to medium term, and reinforced the suggestion that, in the longer term, the Advisory Forum would benefit from greater permanent staffing levels.

7.51 SEERA and EERA were unable to attend the third hearing, having attended the two previous sessions for the debates on housing and employment. However, it was made clear in a meeting between our consultants ERM and EERA, the findings of which were endorsed by SEERA, that they consider the Advisory Forum is already evolving into an effective pan-regional planning advisory body and that the existing arrangements for the secretariat should be maintained.

7.52 Nevertheless, we believe that the weight of evidence put to us suggests that the establishment of a permanent Advisory Forum secretariat has clear merits. As an initial development, in advance of SEERA and EERA producing their regional spatial strategies, we think this should be just one senior planning professional, plus administrative support. In the longer term, we believe the Advisory Forum should have three or four professional staff.
Recommendation 18

We recommend that the regional partners consider the establishment of a small permanent secretariat for the Advisory Forum.

Funding

7.53 In the existing protocol the parties undertake to agree an annual budget for the Advisory Forum from their domestic budgets. This arrangement has worked well so far, with money spent only as it is actually required, rather than to a fixed budget. It might be a sufficient arrangement to pay for a single person to run the secretariat.

7.54 However, the Advisory Forum’s agreed programme of inter-regional research will require significant additional funding. Witnesses called for the three regional planning bodies to be willing to deploy some of their research budgets for spatial planning towards this inter-regional agenda.

7.55 It was also generally felt that, in the longer term, it would be appropriate to formalise at least a minimum budget to cover the costs of the secretariat, especially if this expands beyond its initial minimal size.

Recommendation 19

We recommend that, as the Advisory Forum’s role strengthens, it would be appropriate to formalise at least a minimum budget to pay for the costs of the secretariat. Funding should also be made available from the research budgets of the three constituent parties.

A national spatial planning framework?

7.56 The ODPM House of Commons Housing, Planning, Local Government and the Regions Committee has recently reported that London and the south east should not be expected to constrain its own economic development in order to lessen regional disparities, but that Government should aim for growth in every region by enhancing the attractiveness of areas outside the south east through its own investment programmes.

7.57 At the third Scrutiny hearing, a consensus emerged on the need for a national spatial planning framework. The RTPI and CPRE stated that the work of the Advisory Forum would be facilitated by more transparent national policy. This clearly exists to an extent: aspects of it can be seen in the Communities Plan, in the Treasury’s breakdown of national investment by region, and in the national household projections and regional housing allocations. However, nowhere is it currently brought together into a coherent spatial policy. Without this, the Advisory Forum’s discussions on housing, employment, airports, waste, etc. will take place in a wider policy vacuum.

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Robin Thompson echoed this sentiment, pointing out that the Mayor has a clear European context within which to frame his policies but no national context.

We agree that stronger inter-regional planning across the Greater South East, and more particularly for the Greater South East to be involved in discussions with other regions, would begin the process of building a national framework. This might serve two purposes. It might spur Government into taking action to establish a national framework. And at the same time it would help to ensure that this process is not entirely government-led but has a strong regional input.

The hearing discussed the benefits of a national conference of the regions in serving this purpose.

**Recommendation 20**

We support the creation of a national spatial planning framework. Towards this position, we recommend that the Advisory Forum initiates a wider conference between the Greater South East and other regions, to be held on a regular basis.

**Conclusions**

We have identified two opposing views on the future development of the Advisory Forum:

- that it needs significant overhaul and extension
- that it is already evolving to fulfil an effective inter-regional role on planning matters.

It is our view that it is possible to endorse both these views. We advocate some strengthening of the Advisory Forum as part of its current evolution. We also consider that, once all three regional planning bodies have produced their first regional spatial strategies, there would be benefits if the Advisory Forum took on a wider remit and developed a more pro-active role in the formulation of aspects of joint strategy.

In summary, we are recommending that the Advisory Forum’s role is formally strengthened, through a re-issue of the joint protocol, to embrace a number of key functions – including monitoring, research, advocacy, articulation and mediation on key issues, scrutiny, supporting sub-regional partnerships and, in due course, developing aspects of joint strategy appropriate to all three regions.

To support this expanded role, we conclude that the Advisory Forum should have a small, dedicated secretariat, providing continuity of support and organising regular conferences for the Advisory Forum and its regional stakeholders.

We believe that our proposed strengthening of the Advisory Forum will enable any inter-regional discrepancies in provision for housing, employment and transport to be more effectively addressed.
Annex A: Recommendations

Population, households and housing

1. We support proposals made by the three regional planning bodies, endorsed at the EIP, to review Census data jointly.

2. We support the Advisory Forum’s decision to take an overview of housing need and provision across the Greater South East.

3. We recommend that the Mayor should work with the surrounding regions to ensure that all possible steps are taken to meet affordable housing needs arising within London and across the wider region. This should include a consideration of a new Regional Housing Executive (or other arrangements) to assist those in social rented housing, who wish to do so, to move out of London to the neighbouring regions.

Employment, labour markets and commuting

4. We reiterate our call to the Mayor for investment in training and local access improvements to maximise Londoners’ opportunities to take up employment opportunities within the capital.

5. To maximise the use of public transport across the Greater South East, we recommend that the three regional planning bodies liaise to call jointly for the realisation of heavy rail investment projects in the shortest realistic timeframe.

6. We welcome the EIP Panel’s recommendation that the London Plan should place greater emphasis on promoting London’s polycentric development.

7. We recommend that more work should be done by the three regional planning bodies and the relevant transport agencies to promote sustainable transport in Outer London and outside London, including:
   - determining the best pattern of services on existing and new routes, and how these could be supplemented with bus and coach services
   - encouraging reverse commuting to utilise existing spare capacity
   - investigating whether user charging should be introduced on orbital routes
   - joint work on Park and Ride, and
   - establishing a coherent set of parking standards for new development.

Waste, freight and airports

8. We recommend that the Mayor undertakes a full and thorough consultation with the neighbouring regions on the findings of TfL’s freight study, and that the multi-modal freight facilities needed to serve London and the surrounding areas are identified jointly between London and the neighbouring regions.

9. We recommend that the Advisory Forum continues to take an active role in the issue of airport capacity across the wider region.
The Advisory Forum

10. To achieve greater inter-regional collaboration, we recommend that the Advisory Forum considers whether its role needs to be formally strengthened, and its protocol revised accordingly.

11. We recommend that SEERA, EERA and the GLA each identify funding to support joint spatial planning research across the three regions, and that they each produce annual monitoring reports on a commonly agreed timeframe.

12. To address commonalities and differences between the three regions and to highlight issues to be resolved in constituent regional spatial strategies, we encourage the Advisory Forum to develop an articulation and mediation role.

13. We support the recently developed role of the Advisory Forum in speaking with a single voice to Government, the European Commission and other bodies on issues concerning the Greater South East.

14. We recommend that the Advisory Forum scrutinises the investment plans of public bodies where there are clear pan-regional implications.

15. We recommend that the Advisory Forum provide the wider regional context within which strategic planning partnerships in the Greater South East operate.

16. We recommend that the Advisory Forum engages with and reports to stakeholders in an annual (or six monthly) conference.

17. We recommend that more senior officer time is dedicated to the Advisory Forum, including the establishment of topical officer sub-groups to resolve specific issues.

18. We recommend that the regional partners consider the establishment of a small permanent secretariat for the Advisory Forum.

19. We recommend that, as the Advisory Forum’s role strengthens, it would be appropriate to formalise at least a minimum budget to pay for the costs of the secretariat. Funding should also be made available from the research budgets of the three constituent parties.

20. We support the creation of a national spatial planning framework. Towards this position, we recommend that the Advisory Forum initiates a wider conference between the Greater South East and other regions, to be held on a regular basis.
Annex B: Evidentiary hearings and expert witnesses

The following witnesses appeared before the Committee:

3 June 2003
- Professor Ian Gordon *London School of Economics*
- Professor Christine Whitehead *London School of Economics*
- Ray Bowers *Head of Spatial Planning, South East England Regional Assembly*
- John Watson *Policy and Projects Director, Department of Planning and Transportation, Corporation of London*
- Peter Headicar *Reader in Transport Planning, Oxford Brookes University Department of Planning*
- Bridget Rosewell *Chief Consultant Economist, GLA*
- Henry Abraham *Head of Transport, GLA*
- John Lett *Manager (Strategic Planning), GLA*
- David Dash *Principal Planner, GLA*
- Elaine Seagriff *Strategic Policy Manager, Transport for London*

17 June 2003
- Colin Barnard *Regional Planning Consultant for the East of England Regional Assembly*
- Alison Bailey *Strategic Planner, South East England Regional Assembly*
- Mark Kleinman *Head of Housing and Homelessness, GLA*
- John Lett *Manager (Strategic Planning)*
- Duncan Bowie *Senior Planner Affordable Housing, GLA*
- John Hollis *Demographic Consultant, GLA*
- Chris Holmes *Visiting Research Fellow for Institute of Public Policy Research*
- Gideon Amos *Director, Town and Country Planning Association*
- Robert Shaw *Policy Officer, Town and Country Planning Association*
- Judith Salomon *Director of Property and Planning, London First*
- Irving Yass *Director of Policy, London First*

8 July 2003
- Cllr Philip Portwood *Chair of the Transport and Environment Committee, Association of London Government (ALG)*
- Roger Chapman *Planning Policy Officer, ALG*
- Robin Thompson *Special Planning Advisor to the Mayor, GLA*
- Martin Simmons *Regional Planning Consultant*
- Kelvin MacDonald *Director of Policy and Research, Royal Town Planning Institute*
- Nigel Kersey *Director London Branch, Campaign to Protect Rural England*
Annex C: Written evidence

Written evidence was received from the following organisations and individuals:

- Association of London Government: Roger Chapman, Planning Policy Officer
- Campaign to Protect Rural England: Nigel Kersey, Director London Branch
- Corporation of London: John Watson, Policy and Projects Director, Department of Planning and Transportation
- East of England Regional Assembly: Colin Barnard, Regional Planning Consultant
- GLA Data Management and Analysis: John Hollis, Demographic Consultant
- GLA Economics: Bridget Rosewell, Chief Consultant Economist
- GLA Strategic Planning: John Lett, Manager Strategic Planning
- GLA Strategic Planning: Robin Thompson, Special Planning Adviser
- Government Office for London: David Smith, Strategic Planning
- Institute for Public Policy Research: Chris Holmes, Visiting Research Fellow
- London Development Agency: Nick Sharman, Director of Operations and Local Strategies
- London First: Judith Salomon, Director of Property and Planning
- London School of Economics: Professors Ian Gordon and Christine Whitehead
- Martin Simmons, Regional Planning Consultant
- Royal Town Planning Institute: Kelvin MacDonald, Director of Policy and Research
- South East England Regional Assembly: Mike Gwilliam, Director of Planning and Transport
- South East England Regional Assembly: Ray Bowers, Head of Spatial Planning
- Town and Country Planning Association: Robert Shaw, Policy Officer
- Transport for London: Elaine Seagriff, Strategic Policy Manager
Annex D: Orders and translations

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Annex E: 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.

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