

London Sustainable Development Commission: report to the Mayor of London

Response to the draft London Plan - 30th September 2002

1 INTRODUCTION

As the Sustainable Development Commission for London established by the Mayor we welcome the vision which the Mayor wishes to promote within the London Plan.

In particular we welcome the Mayor's commitment to the development of London being used to underpin a vision of London becoming a sustainable city: *"My vision is to develop London as an exemplary, sustainable world city..."* (xii)

We are conscious that the aspirations set out by the Mayor in his introduction to the draft Plan are difficult to articulate coherently in such a document and we think that in general the Plan has made significant steps to achieve this. We are also conscious that achieving the Mayor's aspirations will be reliant on:

- The development of a range of planning guidance which should establish clearly how aspects of the Plan will be delivered where the Mayor has established powers
- The willingness from partners with a role in London to support the delivery of these aspirations particularly where the Mayor can exhort and persuade but not require action. These include private, public and voluntary sector partners
- The necessary additional resources being made available to support aspects of the final Plan principally by central government
- Londoners being able to understand and support the Plan and its implementation which will require people to see beyond the grand vision to how it will impact positively on them, their families and friends and their neighbourhoods and how they can contribute to its success.

The London Plan provides the Mayor with a unique opportunity to change and improve London and the lives of Londoners. We hope the Commission's response will be seen in the context of support for the Mayor's vision and aspirations and that the points we make will help ensure that the final Plan provides a more coherent and comprehensive blue print for delivering sustainability in London.

Ian Coull

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Co-chairs, the London Sustainable Development Commission

2 OUR RESPONSE

- 2.1 We have approached our response on the basis that the projected population growth is a given and that it is not in the power of the Mayor to significantly affect this. Equally we recognise that London is already a world city and a significant part of this status is reliant on being a leading financial and business services centre and this impacts on how London is bound to develop. These factors may not provide an ideal point from which to improve London's sustainability but this is the starting point at which we find ourselves.
- 2.2 Our response focuses on strategic aspects of the plan and on issues relating to Londoners. The response takes account of the framework for sustainability in London which we are currently developing and which is subject to approval by the main commission. The current draft is attached as Appendix 1.
- 2.3 The report covers a number of areas where we have concerns and makes a series of recommendations that we hope the Mayor will find helpful.
- 2.4 Before going into more detailed and significant concerns we would like to pick up some specific issues about the document itself:
- It is not an easy read and we are not sure that the way it is ordered makes it easy to follow or makes the document coherent – it is therefore possible that in making our response we may have missed elements of the plan which address concerns we raise;
 - We feel that the three key themes of sustainable development, the health of Londoners and equal opportunities tend to become less clearly articulated as the document develops;
 - We do not think every aspect of the document will promote sustainability - this does not mean that cases should not be made for some forms of development but they should not be made on the back of a sustainable development agenda

We have developed these themes in the following sections.

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3 SETTING THE CONTEXT – OUR VIEW OF SUSTAINABILITY

- 3.1 The London Plan is a unique strategic document that will drive the development and progress of London and Londoners. It is therefore vital that the call for sustainable development is clearly articulated as an overarching priority of the Plan and that the principles of sustainable development are integrated throughout the document. The current draft of the Plan falls short on both counts.
- 3.2 The Commission found Chapter 4 of the Plan extremely muddled. Supposedly about the cross-cutting themes in reality only 6 of its 38 pages are specifically devoted to these (pages 255-260). The detailed sections in this chapter on environment (under the heading of ‘metabolism’) and design and heritage would be better placed in Chapter 3 under the heading of Thematic Policies.
- 3.3 The Commission considers the term ‘cross-cutting theme’ to be insufficiently weighty and prefers the term overarching priority. We also consider the current positioning of these, tucked at the tail-end of Chapter 4, to be inappropriate. A fuller, clearer articulation of the Plan’s overarching priorities: sustainable development; the health of Londoners; equal opportunities; and the connections between them, is needed at the front of the document.
- 3.4 We also have concerns in relation to language. The term sustainable development is mainly used in the Plan to describe environmental development. Sometimes the terms environmentally sustainability and green are used in the Plan, but rarely the terms social sustainability or economic sustainability (unless in relation to growth that can be sustained indefinitely). The term sustainable is used more frequently, but to describe things other than development e.g. a sustainable approach; a sustainable city. The Plan needs to be re-written throughout to correct the loose use of language which we believe stems either from a weak understanding or a weak application of the concepts of sustainability and sustainable development, or both.
- 3.5 Sustainable development describes a type of development that enables all people to realise their potential and improve their quality of life in ways that protect and enhance the earth’s life support systems. It promotes activities that achieve mutually reinforcing economic, social and environmental benefits. The emphasis should be on synergies rather than trade-offs and on tackling the complex causes rather than the symptoms of any imbalances. This theme does not come through sufficiently in the Plan.
- 3.6 To identify sustainable development solutions the Commission believes that it is necessary to take account of the interconnectedness of ecological, physical, social, cultural, economic and political systems. For instance, there is a need to take account of the fact that the poorest people in society tend to live in the areas of greatest environmental degradation - the places where pollution levels are highest, where litter is a fast-breeder and where aesthetics provide little relief - and that this, in turn breeds social alienation.
- 3.7 There is also a need to take account of the fact that people who do not feel they belong to society are unlikely to take responsibility for themselves, their relationships with others, or their impact on the environment. The links between environmental and social sustainability are not well made in the Plan. As a result the solutions proposed rely on many existing unsustainable policies such as road

building related regeneration.

- 3.8 The fact that these fundamentally important strategic issues were not picked up through the sustainability appraisal, leads us to question its efficacy. We are also concerned that the Options Appraisal document (SDS Technical Report 17) did not appraise different basic options either for the spatial development of London, comparing emphasis on the central area and City/City Fringe with emphasis on suburban town centres; or for more and less environmentally sustainable patterns of economic growth. The document does, however, in its second half contain some useful comments on the geography of London's development.
- 3.9 We welcome the greater emphasis on the needs of Londoners, than in Towards the London Plan, 2001 we feel that if 'social justice' is important for achieving economic stability in London, then the Plan needs to be clearer on how the economy should be seen as a means of achieving the social and environmental objectives of the Plan and not as an end in itself. A key challenge therefore will be to ensure that these objectives are genuinely seen as interlocking and equal weight is given to environmental and social concerns.

4 CONCERNS

4.1 Transport

The draft London Plan contains welcome commitments to mixed use and higher density developments located in town and local centres. The reallocation of road space, the parking strategy (policy 3C.20) and residential parking policy (linked to the suggested Sustainable Residential Quality) are also helpful starters although we consider that the parking standards in Annex 4 are lax and with none at all proposed for mixed use developments including retail parks, this appears inconsistent and unbalanced.

The active promotion of improved public transport services, walking and cycling facilities will bring much needed benefits to the existing transport network. In the case of walking and cycling it would be helpful to see more consistent consideration of these modes alongside mentions of public transport.

We also welcome the Draft Plan's policy of discouraging out-of-town retail developments and promoting London's town centres.

Notable areas where the draft Plan is seemingly at odds with an essential shift toward sustainable transport are:

- The suggestion that more air travel and airport growth is part of a 'sustainable and balanced' airport system for London and the South East;
- An uncertain commitment to reducing people's need to travel (consistent with Planning Policy Guidance - PPG13 and GOL Circular 1/2000); the Cabinet Office Social Exclusion Unit's interim report on transport and social exclusion has also emphasised reducing the need to travel as a way of assisting equitable access to amenity and achieving social objectives;
- The extent to which the Plan reduces the need to travel by planning the location of homes in proximity to employment and essential services such as education, health, recreation and basic retail. It is noted that the Entec sustainability appraisal also questioned the extent to which land use and transport policies will move away from sustainability in London's transport. In particular the appraisal identified a need for the Plan to detail the balance between employment and homes in Opportunity Areas and Areas for Intensification;
- Plans to stimulate large increases in travel and trips with large increases in commuter trips by the provision of large new infrastructure projects. It is accepted that some major projects may be necessary and desirable and would assist a degree of modal shift. But a general presumption that major infrastructure projects are necessary needs to consider that large schemes will make those opportunities easier to access from the rest of the South east. Further work is necessary to address concerns that major schemes do not induce long distance commuting and that the cost of using both existing and planned transport in London will not disadvantage Londoners who, the Plan, envisages, will access new employment opportunities;

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- A stance on regeneration and road building that presumes that (un-stated) regeneration benefits will be achieved through inducing more road traffic through selected road building. Evidence from the Government's Standing Advisory Committee on Trunk Road Assessment (SACTRA) suggests that road building is not a pre-requisite for regeneration. More to the point, sustainable regeneration rather than a rush to develop should be the stated aim across London and especially in the Thames Gateway. Here, land use planning should be based on reduced need to travel and low dependence on car travel. The case has yet to be made that road building in the Thames Gateway meets these aims;
 - Allowing road traffic growth, already higher in outer London than other parts of the capital, to continue to rise. Related to this is an underplaying of the potential of 'soft' transport measures even though research has shown how soft measures such as company travel plans, safe routes to school and so on have greater potential to assist people in reducing the transport impact than is usually recognized. (*Ref: Review of the Effectiveness of Personalised Journey Planning Techniques, DTLR, January 2002*).

As with other aspects of the Plan the production of Supplementary Planning Guidance may assist in clarifying some of the details mentioned although some issues are more fundamental than mere guidance - the detail, status and enforcement of which seems uncertain at the time of writing.

4.2 Delivering new homes

This critique questions whether the figures included in the London Plan for the supply of new housing are sufficient to meet both the existing pent up demand and the new demands that will be placed as London grows. If it does not:

- London will continue to have difficulty in delivering key services and the business sector will struggle recruiting and retaining more junior staff
- Poor people will continue to be inadequately housed with subsequent impacts upon health, educational attainment and aspirations
- People travelling to work or on other routine journeys will continue to over-rely on the car with the subsequent impact on air quality and noise pollution
- London's hinterland will bear the strain of providing homes for people unable to afford to live in London, raising local house prices and contributing to a likely increase in congestion and poor air quality as people choose to drive into London rather than to use public transport.

Getting the provision of new homes right is essential. Set out below is a review of key areas of the London plan related to this.

The Mayor's Commission for Housing identified that 43,000 homes were needed each year for 10 years to deal with the backlog of shortage and projected growth of which 28,000 needed to be affordable including social rented and intermediate tenure. In this context we are concerned that the plan is using central government's figure of 23,000 new homes annually for London as the additional homes required although we recognise that this is the minimum new homes sought to be provided annually.

4.3 **Delivering affordable housing**

The affordable element of the new housing will be met from a combination of government funding primarily through the Housing Corporation and planning gain. We have concerns that this will not be sufficient to meet the level of affordable housing set out by the Mayor which we would question, taking account the existing pent up demands for affordable housing with around 34,000 households living in temporary housing in March 2001. Specifically we are concerned that -

- Good high-density housing is likely to be more expensive. Work being undertaken by the London Housing Federation and East Thames Housing Group on the success of high-density affordable housing points to the need for good quality housing design with good space standards and increased investment in housing management.
- The Mayor draws on the work carried out by Three Dragons/Nottingham Trent University to support the level of new homes that it may be possible to provide through section 106 planning obligations. Further work is needed to ensure that these assumptions are 'real' and to assess the impact of costs being higher.
- That existing allocations of housing grant funding for rented housing is only providing around 4000 additional homes annually which do not meet the annual losses of affordable rented housing from right to buy.
- That, in the event that the number of new homes being provided is inadequate, local authorities will be bound to require the element of affordable housing on new schemes to meet their obligations for housing homeless families. In this context it is more likely that the unsustainable estates that are a feature of London with mono-tenure housing occupied by poor people will be created. In the past this has resulted in neighbourhoods occupied by people with low aspirations who have high demands on health and other local services. This is in conflict with the one of the three interwoven themes set out in the introduction to the plan by the mayor to achieve 'social inclusivity' and to give all Londoners the chance to share in London's future success.
- That current funding for intermediate housing such as low cost home ownership is not geared to provide sub market rental housing and may not be sufficient to provide the 15% target for intermediate housing set out in the plan even when combined with section 106 powers.

4.4 **Issues about high density development**

One of the major talking points arising from the draft London plan is the support to the existing government stance on the need to raise density of new development and to look for opportunities to increase densities in existing neighbourhoods. We welcome the statements on design quality in the plan. Getting this right is important if London is to become a more attractive city for its residents and visitors. However, for many people high-density housing is synonymous with high rise and with urban cramming. While Londoners, particularly social housing tenants are still actively involved in campaigning for the demolition of high rise local authority housing and resisting densities being raised on their estates the plan and supporting guidance need to be much more explicit about what high density housing looks and feels like.

We are concerned that the plan as currently written does not sufficiently demonstrate what different forms of high-density housing would be like to counteract existing legitimate concerns and prejudice.

A great deal of reliance is being placed on the production of Supplementary Planning Guidance on Sustainable Design & Construction. This needs to provide for both the good quality design and high environmental standards that are required to make high-density development acceptable. We urge the Mayor to produce this SPG before the Examination in Public, so that the planning inspectors are able to evaluate it and thereby come to a view about the Draft Plan's policies on density.

4.5 Neighbourhood facilities

The Mayor refers to the need to ensure new development includes well-designed and landscaped areas and to the need for local infrastructure, including health and educational facilities. What the Plan is less clear about is the how more local community provision will be provided and maintained.

Getting this right is very important. In the past new developments including social housing, community halls, public open space and landscaped areas have been provided and then poorly maintained. Many of the current new deal, SRB and town centre regeneration programmes include the replacement or refurbishment of previous failed community provision. We are concerned that the plan does not appear to consider the issue of long-term upkeep which is a clear part of delivering sustainability.

4.6 Timing issues

One key aspect of creating sustainable new housing developments is the timing of the supporting infrastructure. For the Opportunities Sites in particular, significant initial investment is required to ensure the sites are well serviced on a planned basis as they are developed. In the past housing poorly located in relationship to public transport, schools, employment and leisure facilities has been less popular and for poor people able to exert little or no choice about where they live, disastrous.

We recognise that significant investment is required if this infrastructure is to be put in place when it is needed. In Section 5 of the draft plan there are references to how this might be achieved -

- 5.4.3 picks up the need for additional investment for London to support the development of infrastructure such as housing, transport and neighbourhood renewal and in developing support services including social services, health, education and employment and skills programmes.
- 5.5.0 refers to looking at how resources may be generated through planning obligations particularly in the context of transport but this could be applied more generally.
- 5.4.2 recognises the need to recoup public investment particularly public transport investments where land values rise as a result of improved infrastructure.

We are not clear whether an exercise has been undertaken to assess the timing issues associated with providing particularly transport infrastructure in the early stages of development and then the provision of schools, shops, local employment opportunities, health, waste, leisure and other community facilities as new homes get built.

Thames Gateway

Timing issues are particularly important in Thames Gateway where a significant proportion of the new homes to be provided for the growing London population are likely to be located. These are reliant on significant new infrastructure. In our view it is possible that too much reliance is being placed by both London government and central government on new homes being provided in this area early in the life of the Plan. The temptation to allow new housing in particular to be provided before other infrastructure has been agreed and in part delivered would increase reliance on the car in particular and for those without access to a car create more social exclusion. This would impact particularly on low-income groups with limited choice about where they live including households on low incomes, women, people from black and ethnic minorities and those with special needs including people with physical disabilities.

4.7 Partnerships

The delivery of the Plan relies significantly on working in partnership with a range of other organisations. We have a number of concerns over how this will affect delivery. We have already stated that the Mayor does not have sufficient powers to deliver his vision for London. Even if the Mayor possessed more powers it would still be desirable and necessary to gain buy in from and partnership with a range of organisation and agencies.

We welcome the chapter on partnerships and annex 6 in the Plan on implementation tools. However, our experience of partnerships is that they are not always successful in meeting their objectives. There are often issues about responsibilities, power and access to resources that mean that non statutory organisations, particularly voluntary organisations, can only make a limited impact. There are also issues about the ability of high-level partnerships to deliver locally and to understand local differences and needs.

We are concerned that not enough is said about the role the voluntary sector can play in delivering the plan and we feel this is also linked not unreasonably on the plan taking a strategic view rather than being concerned about detail. However, Londoners will judge the success of the Plan as it affects them and work with London's voluntary sector and local community organisations in delivering the plan locally is very important. We recommend that the Environment Agency also be considered a key partner in delivering the Plan.

4.8 Business involvement

The role of business large and small, either in delivering or thwarting genuine sustainable development has been placed in the spotlight following the Johannesburg World Summit on Sustainable Development, not least because of business's own efforts to position itself in the debate. The agenda however is changing and the role for business will require different approaches to those demonstrated to date.

In response to the changing debate, itself backed by a sense of urgency over lack of progress to date over sustainable development, the Mayor's London Plan, chief among his strategies, will have a central role in ensuring business steps up to the sustainable development challenge. That challenge is not, and should not be allowed to become, an exercise in re-branding current unsustainable activities and practices.

If business's role in sustainable development is to be positive and meaningful all sectors will have to start changing their ways. Part of the shift will come through public policy and strategy asking more searching questions of business activities and demands. The draft London Plan's emphasis on the role of the financial services sector places a greater duty on that sector in particular to act in the delivery of sustainable development.

Parts of the financial services sector are already responding to the changing agenda for example, by adopting more progressive investment strategies. This work, which needs to be widened and accelerated, is occurring largely under the sector's own steam. Taken further, the sector could do far more in assisting economic diversity, community and social cohesion within London. The London Plan is a key negotiating document that should assist and promote the development of this new role for the financial and business services sector and gain the necessary appropriate buy-in.

We need to emphasise that these business role issues need to be fully integrated across the Mayor's areas of responsibility, including the London Development Agency and therefore need to be considered as part of any revisions to the Mayor's Economic Development Strategy.

5 MEASURING THE IMPLEMENTATION OF THE PLAN

- 5.1 Two of the most important pages in the draft London Plan are pages 284 and 285, which are a table headed "Key performance measures". The table sets out the main indicators and targets which will be used to assess London's progress, or lack of it, in moving towards the aims set out in the draft Plan.
- 5.2 These are important pages for the debate about the sustainability of the policies of the draft Plan. At the same time, it is important not to overemphasise the significance of targets. It appears likely, for example, that government targets for renewable energy production in the UK and for air quality in London will not be met. Ambitious targets cannot on their own deliver results, but in most cases require ambitious policies and arrangements for implementation if they are to be achieved.
- 5.3 The key performance measures are each presented as relating to one or other of the six key objectives in the Mayor's vision. Two of these objectives are very closely related to the theme of sustainable development: "*making London a more accessible city*" and "*making London an attractive, well designed and green city*".
- 5.4 We have concerns of over some aspects of these targets. In the case of traffic levels, we feel the thinking is confused. The aim (in column 2 of the table) of a "reduction in traffic growth" is seen as being measured by an indicator (in column 3) that is not about traffic levels but about the amount of traffic congestion - something very different. It is possible to reduce congestion by re-phasing traffic lights and reducing road space for pedestrians, thereby speeding up traffic flows and tending to increase traffic volumes rather than reduce them.
- 5.5 Earlier in the draft Plan (page 191, Policy 3C.14) the aim in the Mayor's Transport Strategy of reducing weekday traffic by 15% in Central London is reaffirmed. But on page 285, in the "key performance measures", that aim is replaced by the aim of a 15% reduction only in traffic congestion.
- 5.6 The aim of "strengthening of public transport infrastructure" has two particular schemes selected as key - Crossrail 1 (with a completion date of 2011) and Thameslink 2000 (by 2008). This indicates that other schemes - such as Orbirail and those for new tram routes - are seen as less important. In the early thinking that went into the Draft, Orbirail was seen as particularly important, part of a vision about boosting inner city areas through public transport and the creation of a "London of interchanges".
- 5.7 The biodiversity and waste targets reflect what is said in the mayoral strategies on those topics. So does the language about a target for CO₂. But in this case, although the task of recommending a target has been given to this Commission, this approach is a matter of regret. . Although the target will be included in the draft Energy Strategy in due course, this means that consultation on the target will be carried out through a separate process from the consultation on the policies for achieving a target, thereby encouraging a divorce between target-setting and sorting out the policies which go with it. Clearly of course, this also implies that there has been no view about the scale of carbon emissions reductions underlying the policies set out in the Plan. The other is that it means the Mayor is currently not committed to any target, even as an initial suggestion, and so there is no

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- target on this crucial topic to put in the draft Plan.
- 5.8 From a sustainability point of view, we regard these as the two most important indicators for the finalised London Plan to incorporate: traffic volumes (not congestion) in central London; and carbon emissions reductions.
- 5.9 Also fundamental for sustainable development is the aim to "ensure development capacity is adequate to meet market needs". There really is no such thing as "market needs" once we move beyond a simple "predict and provide" model. The market does not have "needs", it has levels of demand, and these depend on prices. Prices in turn depend on the scarcity or abundance of what can be supplied to meet that demand. If, for example, land in a particular area is scarce, it is likely to be expensive and this will discourage demand, regardless of what is said to be "market needs". Sustainable development is very largely about being sensitive to limitations on the supply side - including the supply of land and the supply of environmental capacity such as the capacity to absorb carbon emissions without catastrophic climate change. Much of the language in the draft Plan fails to take this on board, seeing instead an overriding imperative to meet whatever "market needs" are said to be. A particularly important example of the outcome of this thinking is the draft Plan's treatment of airports and aviation issues.
- 5.10 GOL Circular 1/2000, "Strategic Planning in London", which sets out the framework for the drawing up of the London Plan, provides that the Mayor and its other authors should take into account PPG11, "Regional Planning". We are concerned that the contents of the draft Plan seem to diverge in important respects from what is set out in government guidance, especially in PPG11.
- 5.11 The Draft Plan contains only "key" performance measures. On page 281, para 5.74 says that: *"the Mayor agrees with government advice that a core set of measures can give an overall indication of how effectively the central strategy is being implemented."* This appears to be a particular interpretation of government advice, implying that the draft plan need only include the core measures. The latest Good Practice Guidance on Targets and Indicators (3.0 & 3.1.1) says that: *"These key targets should be complemented by an additional full set of indicators to enable a comprehensive review to be undertaken."* We would like to see this advice followed by the authors of the finalised London Plan.
- 5.12 There is a particular need for targets - and this is also recommended in the Good Practice Guide - about the outputs of the GLA itself. Of course it is important to have targets about London's overall performance as regards traffic levels, biodiversity, and so on - but it is also important to measure the success of the GLA in what it is doing itself, for example about the thoroughness of the environmental assessment of planning applications referable to the Mayor; and also to measure the success of the GLA in influencing other bodies, particularly the boroughs in the drawing up of their UDPs.
- 5.13 The GLA Act requires all the Mayor's strategies to be consistent. In our view, this would be best achieved by the policies and targets in the strategies other than the draft London Plan, where they have significant planning implications, being reflected in the Plan. For example, the target for traffic should be amended in line with the Mayor's Transport Strategy. There should also be targets for the other strategies currently not represented in "key performance measures". The most important change here would be the inclusion of a target for air quality reflecting the Mayor's Air Quality Strategy.

6 RECOMMENDATIONS

Set out below are a number of recommendations that we think that the Mayor may want to start to address before the formal hearing of the plan takes place. Some will involve working with other agencies and the Commission would be keen to use our knowledge and resources to suggest organisations who might wish to help on delivering suggested solutions to implement the recommendations we are making.

6.1 Stronger and clearer articulation of sustainability as a cross cutting theme

- We are aware that Entec UK Limited was appointed to carry out a sustainability appraisal and we have reviewed this document. We are concerned that while the appraisal contains some points which are useful it did not effectively get to grips with making sustainable development issues an 'overarching priority' in the way we would have expected and which we now suggest. The Commission would be happy to take the lead in helping to achieve this by appointing advisors to work with us to deliver this objective.
- We welcome the Draft Plan's policy of protecting publicly owned green spaces, but are concerned that figures have not yet been produced for the land take required by the different policies in the draft and a comparison made with the total area of land which is available. We would also like to see further work carried out to follow up the Options Appraisal, particularly to examine different spatial options for London's development.

6.2 Performance indicators

Having considered the "key performance measures" in relation to sustainable development issues, we recommend the following changes be made to the draft London Plan:

- The traffic congestion target for Central London should be replaced by the traffic volume target set out in the Mayor's Transport Strategy.
- The Mayor should state a view on a target for carbon emissions reductions before the Examination in Public.
- One or two targets for air quality, based on those in the Mayor's Air Quality strategy, should be included amongst the "key performance measures".
- An attempt should be made to assess the impact - on the basis of current trends and ratios - of draft Plan predictions for economic, population, and household growth on each of the environmental indicators amongst the "key performance measures", in order to provide a measure of the extent to which the Mayor's environmental strategies will need to be effective, initially simply to counteract the effects of the growth envisaged in the draft Plan, and then beyond that to achieve the key targets in the environmental strategies. This in turn will provide a realistic indication of the scale of resources which will be required for the implementation of the environmental strategies.

We understand a number of RDAs and Regional Assemblies and the Welsh

Assembly are part of an Environment Agency Regional Economic Resource modelling project doing work in this area which the Mayor may wish to consider.

- An amended version of the "key performance measures" set out in the draft Plan should be supplemented by other indicators, including ones to measure the GLA's own outputs and its success or otherwise in influencing UDPs and other important policy documents.
- The draft Plan should be amended to incorporate an understanding - basic to sustainable development - that supply side constraints exist not only for factors such as transport infrastructure and skills levels, where productive capacity can be expanded, but also for factors such as the supply of land and the capacities of the atmosphere, where the potential for expansion is far more limited. Without greater attention to the environmental aspects of the supply side, this cannot be seen as a plan for sustainable development.
- Explicit links (which could be in the shape of agreed targets) should be established with projected growth in employment generally and specifically for new commercial developments to ensure that new jobs created are taken up by Londoners. These should be particularly people living near to the new jobs rather than people commuting and job creation should be linked to employment and training initiatives supported by key employers including the financial services sector

6.3 **Transport**

It would be helpful if the Plan would:

- set out the phasing of transport infrastructure and how this will be planned, organised and put in place before development of land is completed. This is of special concern in the Thames Gateway regeneration zone that should not suffer the transport problems experienced in Docklands.
- give reassurance that the level of attention to be paid to prestige projects will not over-shadow, or divert attention from, essential smaller scale local transport across all London boroughs. These initiatives are needed to cater to the majority of transport undertaken within London, to ensure the present transport system meets current needs and to make best use of limited resources.
- be explicit about how the existing transport network will be made to work better before new pressures are created by the introduction of grand projects. This will be particularly important in the early years of the London Plan's operation when large projects may still be many years from reliable operation.
- Address more fully how people's obligation or need to travel will be reduced and minimised consistent with Planning Policy Guidance 13.
- revisit the role of Orbirail which appears to have been downgraded.
- review the proposals relating to a new airport in the light of evidence relating to the non-sustainability of this type of development.

6.4 **Social housing**

- The Mayor with other organisations including the boroughs, the Housing Corporation, the London Housing Federation and Housing Associations needs to spend some time reviewing existing housing standards for affordable housing, acknowledging that if the housing is to be successful long term i.e. sustainable, it needs to be of excellent quality. Lessons need to be learnt from the experience over many years of providing poor quality social housings which fails with the consequent obvious costs of massive reinvestment to upgrade or redevelop the housing and the less quantifiable costs on those living in the housing.

6.5 High density housing

- The Mayor with other organisations including the boroughs, the Housing Corporation, the London Housing Federation, Housing Associations and private house developers needs to establish blueprints for achieving sustainable high density housing developments, including looking at how to establish a mix of tenures and household sizes, income groups and lifestyles with letting plans for the affordable rented housing to address child density issues in particular.

The Mayor may wish to draw on the research work being undertaken in this area by the London Housing Federation and East Thames Housing Group.

- The Mayor should attach a high degree of importance to the production of the proposed Supplementary Planning Guidance on Sustainable Design & Construction. This should be published before the beginning of the Examination in Public.

6.6 Creating successful neighbourhoods

- The Plan has the opportunity to actively promote balanced communities. We are concerned that the plan treats the population movements associated with people moving into London tending to be young adults while those moving out are mostly older employees, retired people and young families as inevitable, and recommend that instead of accepting this, the London Plan should challenge it and aim to encourage these cohorts to stay. This requires greater emphasis on ensuring that facilities important to these groups are put in place.
- A useful addition to the Plan would be a framework that will ensure that development activity associated with regeneration demonstrably has a positive impact on local communities. The Plan makes no specific statement on complementing existing regeneration projects. However, it does say that planning frameworks will be prepared for Opportunity Areas and these will build on frameworks already developed and take account of the community, environmental and other distinctive local characteristics of each area. The Mayor may want to consider the framework being adopted by his Sustainable Development Commission.
- Models need to be developed that ensure long-term funding is achieved to support neighbourhood facilities and local open space, based on existing good practice such as local Community Trusts. This will include looking at how long-term funding can be secured through the planning system by way of commuted sums or through overage arrangements or by ensuring developers allocate a proportion of ground rents to ring fenced 'vehicles' set up specifically to

manage and maintain local facilities long term.

This includes looking at ways of ensuring existing facilities adjacent to new developments can benefit from the new development to improve facilities and to provide long term funding.

6.7 Securing the growth in value as a result of new developments

- The reliance on using planning obligations to meet a range of social objectives including improving public transport, providing schools, health, leisure and community facilities as well as affordable housing needs to be reviewed working with local authorities, central government and the private sector to -
 - ensure that developers cannot legitimately claim that they are not able to undertake new development because of the level of obligations made;
 - to assess what public funding might be needed either to kick start development or to meet aspects of the social objectives required to achieve a sustainable development
 - to establish mechanisms to capture the increase in land and development values as a result of initial pump priming through the public purse using existing examples of successful overage arrangements and similar devices.
- The plan needs to contain clear policies regarding existing statutes (for example, the Race Relations Act and Disability Discrimination Act that will require physical alterations to premises from 2004).

6.8 Achieving buy in from Londoners

- Finally, the London Plan must require and inspire a commitment to sustainable development. In addition to getting the message right within the document, there is also need to actively and creatively promote the sustainability message to Londoners, to catalyse engagement in the sustainable development process and create a sense of common endeavour. London is a creative centre – a hub of writers, artists, actors and musicians along with other people with strong communications skills. We would strongly recommend that the Mayor draw on these London strengths to help communicate the sustainability message to Londoners and to promote London as a sustainable city.

Appendix 1. London Sustainable Development Commission
A SUSTAINABLE DEVELOPMENT FRAMEWORK FOR LONDON
Draft 30th September 2002

Vision for London

London has retained its position as one of the World's great cities over many centuries because of the quantity, quality and diversity of its people, businesses, infrastructure and natural resources. However, the downside of this pre-eminence has been the associated social division, pollution and increasingly wasteful use of resources.

Our vision for the 'World Class' London of the future is a place where all Londoners and visitors feel the greatest possible sense of physical, emotional, intellectual and spiritual well-being. Our thinking and decision-making will be long-term, meeting the needs of the present without compromising the ability of future generations to meet their own needs. This means ensuring that the ways in which we live, work and play will not interfere with nature's inherent ability to sustain life.

We will achieve this by taking responsibility for the regional and global impacts of city life. Because of our commitment to inclusion and cooperation, we will be able to build on the rich and diverse talents that we have. Resources will be used efficiently and fairly and the natural and built environment protected. Our reward will be a prosperous city, one in which we all make the most of opportunities for fulfillment.

All of us have a part to play in achieving this vision. Each step will be supported by clear objectives and targets and will be sustained by learning from success.

Objectives

Taking responsibility

1. As citizens of a world city, we will be aware of the impact of our actions on the rest of the UK and beyond. London in its world leadership role will contribute to the planet's sustainability.
2. All of us - individuals, households, businesses, local and regional government, voluntary groups — will have the information, knowledge, motivation and support to help us to take both short and longer-term decisions that will make us and our city more sustainable.
3. We will seek new and creative ways to overcome the constraints of time and money that prevent us from taking effective decisions. We will ensure that these decisions are informed by a long-term perspective.
4. We will build and sustain a powerful sense of ownership and responsibility for our city, with civic participation as the norm.

Developing respect

5. Our city will recognise that our key strength lies in our diversity, and so will have a culture of tolerance, fairness and respect. The right of all London's citizens and communities to pursue fulfilment will be assured, so long as this does not infringe the rights of others.

6. Our city will be a place where everyone feels at ease and is able to enjoy life. All who work, live and play in the city will be able to pursue their objectives in peace, free from the threat of crime, violence or intrusion.

7. Our communities will be dynamic, stable, adaptable, innovative, progressive – creating a city in which conflicts will be resolved as part of a transparent and participatory process.

Conserving resources

8. We will protect and improve the city's natural ecosystems, its biodiversity, its open spaces and its built environment. We will help to protect the wider regional, national and international environments with which London has links.

9. We will limit and deal with our pollution, and use energy and material resources prudently, efficiently and effectively, including re-using and recycling our residual waste.

Getting results

10. We will make consistent economic progress – not necessarily always growth – to enable wider economic, social and environmental objectives to be pursued both in London and beyond. Business transactions in London will be conducted to high ethical standards.

11. All the different parts of our economy will consistently invest in new technologies, new solutions, new plans and new ideas that contribute to achieving social, economic and environmental objectives simultaneously.

12. All forms of work will be recognised and valued. Paid employment will be plentiful.

13. We will be healthy and fulfilled – through living in good housing, with unrestricted opportunity to develop as individuals and communities, through access to services, good quality food, green space and cultural, sporting and leisure activities.

14. We will achieve environmental, social and economic development simultaneously, the improvement of one will not be to the detriment of another. Where trade offs between competing objectives are unavoidable, these will be transparent and minimised.