

Mr Ken Livingstone
Mayor of London (London Plan Further Alterations)
Greater London Authority
City Hall
The Queen's Walk
London SE1 2AA

Date: 21 December 2006

Dear Mr Livingstone

RE: Submission in Response to the Public Consultation on the Mayor's Further Alterations to the London Plan

I am pleased to forward you the London Sustainable Development Commission's submission on your Further Alterations to the London Plan.

Please do not hesitate to contact me, or the Chair of the Planning and Development Sub-Group, Mr Peter Head, should you require further information, or discussion about our submission.

Yours sincerely



June Barnes
Chair

London Sustainable Development Commission

Submission in Response to the Public Consultation on the Mayor's Further Alterations to the London Plan

Preamble

The London Sustainable Development Commission welcomes this opportunity to comment on the Mayor's proposed Further Alterations to the London Plan.

Our comments build upon, but do not duplicate, our comments on the Mayor's Statement of Intent (March 2006). They also take account of our input to the Sustainability Appraisal of the Assembly Draft.

Our overall response on the Plan is framed by four interlocking perspectives:

- Our explicit role to promote sustainable development in London, in large part as "critical friend" to the Mayor and the GLA
- Our interpretation of "spatial planning" (as distinct from "land-use planning") as precisely the kind of strategic space within which the integrative thinking implicit to sustainable development can and should take place
- Our judgement that there is a need for a 'paradigm shift' in the conceptualisation and delivery of sustainable development in London
- Our commitment to the idea of "virtuous cycles" as the most practical method for achieving integrated thinking, and for positioning sustainable development as a pro-active process in the minds and working practices of all stakeholders

Given this context, this submission contains four elements:

- Our views on the status of the SA/SEA report and process
- Our overall response to the status and significance accorded to sustainable development in the Further Alterations
- Our proposition that virtuous cycles be given a more explicit and prominent role within the Plan
- Our concern that the principal weaknesses of the Further Alterations occur with respect to its implementation, a concern that we articulate via examples of virtuous cycles that exist within the Further Alterations

I The Sustainability Appraisal/Strategic Environmental Assessment

The Commission was involved in the development of the SA/SEA methodology on the Further Alterations, and in the SA/SEA process itself. Having been involved in previous SA/SEA exercises on the Early Alterations to the London Plan, and on the initial SA/SEA on the London plan which all used fairly traditional methodologies for assessing impact, we explicitly sought a more join-up approach in this recent SA/SEA, so that the interdependencies of policies and their impacts could be effectively captured.

We were pleased that our desire to see these interdependencies captured in the SA/SEA was accepted as necessary to measure the complexities at work in the Further Alterations. While we recognise that this meant the methodology was, to all intents and purposes new, we believe that it successfully blended the requirement to meet national SA/SEA guidance, and the evolving approach to understanding sustainability in terms of the interconnections between individual streams of activity (the virtuous cycle approach) rather than assessing each stream of activity in isolation (the silo approach).

We were also impressed with the way in which stakeholders were engaged in the development of both the SA/SEA methodology and in the SA/SEA itself.

We believe that this SA/SEA report is in fact ground-breaking and should foreshadow the adoption of more integrated SA/SEA methodologies in other regions within the UK and indeed on other strategies within London.

II The Overall Status of Sustainable Development in the Further Alterations

The Commission acknowledges, and is impressed by, both the overall status given to sustainable development in the Further Alterations, and the architecture of the document that enables sustainable development to be so effectively cross-referenced. Beyond the headline statements that are required by the Act, numerous direct statements in the Further Alterations attest to this. Paragraph xiii.i, for example, states:

“Secondly, growth must be accommodated in ways that respect and enhance the environment by being exemplary in mitigating and adapting to climate change, and in being energy and waste efficient”

Paragraph 1.49 states:

“The Mayor’s vision for an exemplary, sustainable world city means that Londoners must be more responsible about how much they consume and discard (see Chapter 4A). The London Plan gives an opportunity to plan growth in ways that make better use of key resources such as land, buildings and construction materials, water, energy and waste. For example, integration of planning for development and transport will encourage use of public transport, rather than car-based travel. This plan **continues to avoid** easy but unsustainable options such as Greenfield development and rigorously protects open spaces and environmental assets. It contains policies to ensure that buildings are designed to use energy and other resources more efficiently, both during and after their construction. To help achieve this, investment will be steered towards re-using the wasted resource of previously used or underdeveloped sites in east London and elsewhere. Similarly the spatial implications of the Mayor’s strategies for biodiversity, waste, air quality, ambient noise and energy are critical to the sustainable accommodation of growth in London.”

The sentiments feed through into more detailed elements of the Plan, too. For example, paragraph 1.17 states:

“Levels of commuting need to be managed in the interests of sustainable planning, economic development and avoiding strain on the public transport network, encouraging a switch from cars to public transport and ensuring that as far as possible Londoners are able to take advantage of the opportunities their city provides”

and paragraph 3.25i states:

“Large residential developments will offer economies of scale to achieve particularly high environmental standards and very low carbon emissions. The scale of development is likely to make decentralised energy feasible and all developers should design and cost measures from an early stage in accordance with policies in Chapter 4A.”

In addition, the profile given to climate change throughout the document and, in particular, in Chapter 4, in terms of both adaptation and mitigation, is strongly welcomed. Policies 4A.15 and 4A.2ii, especially, are strongly welcomed.

Whilst welcoming and supporting this, however, we are mindful of the challenges posed by the sheer breadth and complexity of the Further Alterations, and of sustainable development within that. Whilst acknowledging that this is an inevitable outcome of the opportunity afforded by “spatial planning”, this complexity leads us to a concern for the *users* of the Plan.

This concern has two dimensions. On the one hand, it may be difficult for users to distinguish priorities within the Plan. In the event that both cannot be achieved simultaneously, for example, which is more important, in the context of a specific development – meeting the target for affordable homes, or meeting the need for integrated CCHP? Identifying priorities in the context of such an all-embracing Plan may prove very difficult for users.

Secondly, we are not clear how users might best bear in mind the entirety of the Plan, together with its various Annexes, Appendices and so forth, as they make the choices that will determine the Plan’s success or failure. Our concern is that, at the innumerable decision-points when the Plan’s objectives will be relevant, stakeholders will be unable to “bear in mind” all the Plan’s elements. In such circumstances – and our judgment here is informed by our own experiences in promoting the Sustainable Development Framework for London – too many actors may fall back on “silo-based thinking”. Silo-based thinking is the antipathy of sustainable development; and its preponderance will, unless tackled, limit the effectiveness of the laudable aims and objectives of the Further Alterations.

III The Status of Virtuous Cycles

It is our proposition that “virtuous cycles”, properly understood, offer the solution to this dilemma and provide the means of achieving the paradigm shift we believe is necessary. We have submitted previously on virtuous cycles (in response to the Sol, for example) and do not reprise those comments here. It is our judgment that if actors are using “virtuous cycle” thinking, they will more easily and naturally be able to “bear in mind” the totality of the Further Alterations.

There are, in our view, three elements needed to achieve this:

- Giving virtuous cycles a high profile, early in the document
- Making use of practical examples
- Developing a support package for the implementation of the Plan

We address these in turn, below.

Profile of Virtuous Cycles

We recommend that the overall argument of interconnectedness, of the interdependence of the various elements of sustainable development, be made more clearly and transparently, earlier in the document. Setting out – perhaps by means of examples – exactly how the various elements of the Plan might come together would, in our judgment, greatly assist the intended audience to understand the overall programme.

We suggest that this argument be positioned both within the “Mayor’s Objectives” and, to a greater extent, in Chapter 2A, “Overall Strategy”.

Two Examples

In contributing to the Sustainability Appraisal of the Assembly Draft of the Further Alterations, the Commission set out three examples of possible virtuous cycles:

- Land use, energy use, resource flows, access, transport, and climate change
- Employment, skills, mobility, inequality
- Health, well-being, safety, environmental quality, participation, diversity

For this present submission, we have explored the first and third of these with explicit reference to policies proposed in the Further Alterations.

In the case of “Land use”, we wish to start with Policy 3A.21, which is concerned with the provision of educational facilities. This is a straightforward land use issue, and we are pleased to note that beyond reference to the numbers of school-children, the importance of education, the need for cross-borough planning and so forth, the Plan proposes that educational development take account of:

- “safe and convenient access by pedestrians, cyclists and by public transport users
- proximity to homes and workplaces
- the other policies in this plan, including safety, sustainable design and construction, inclusive design, enhancement of the public realm and the protection of the green belt, Metropolitan Open Land and other open spaces in London”

There are clear links here to the elements suggested by our virtuous cycle, and it is relatively straightforward to identify the additional policies – particularly 4A.8 and 4A.7 on energy, 4A.15 and 4A.2ii on climate change and 3C.18, 3C.19 and 3C.20 on transport – that are relevant.

This bundle of policies is particularly apposite given central government's "Building Schools for the Future" programme. This programme, already underway in a number of London Boroughs, will see the redevelopment, refurbishment or rebuilding of every secondary school in London within the horizon of the Further Alterations. Given the large number of schools in London, and the potential for a powerful influence from exemplary development upon the minds of London's young people, it is surely of the highest importance that the BSF programme fully delivers on the Mayor's Vision as set out in the Further Alterations.

It is possible to envisage that the public/private partnerships in every borough will carefully ensure that the new schools are energy efficient and that they factor-in the production of on-site renewables at an early stage in the planning process. It is possible to envisage that these schools will provide community facilities outside school hours and become learning and leisure facilities for the community as a whole. It is possible to imagine that recycled materials will be used during the construction phase; that walking and cycling routes will be carefully integrated with the relevant Borough's transport strategy; and that the design of the new schools will systematically provide internal and external environments that adapt to the urban-heat island climate that London will be facing during the lifetime of these school buildings.

It is possible to picture a London in 15 years' time in which the entire educational built form is contributing significantly to London's status as an exemplary world city.

It is – unfortunately – just as possible to imagine that things turn out rather differently. Project teams will find that financial pressures require "mainstream" energy solutions rather than innovative ones (that is, short term "affordability" will outweigh long term "value for money"); that the requirements for large schools, on pedagogic grounds, will mitigate against "proximity to homes and workplaces", thus embedding continued reliance on the "school run"; that schools will fail to grasp the "Extended Schools" agenda and will be open only during normal school hours, thereby making some of the best local facilities unavailable to anyone who is not a pupil at that school; and that local transport plans will provide cycle routes that do not quite match up with children's patterns of movement, thus undermining the ambition to promote cycling to school.

The difference between these forward paths lies NOT in the Further Alterations *per se*, but in the manner in which they are implemented. Many stakeholders – not just local authority planners – will need to be versed in the art of virtuous cycles if the former of the two futures sketched out above is to be realised. If key educationalists, if key developers, if key energy supply companies fail to adapt, then it will be the latter future that comes about.

A similar tale can be told with reference to the virtuous cycle "Health, well-being, safety, environmental quality, participation, diversity".

Policy 3A.17 clearly sets out the Mayor's health objectives (in the context, obviously, of the over-riding objective to promote health and address health inequalities). Policy 3A.20, on the case for using HIAs, clearly states:

“Health is far more than the absence of illness; rather it is a state of physical, mental and social well-being. A person’s health is therefore not only linked to age and gender, but to wider factors such as education, employment, housing, social networks, air and water quality, **a high quality environment**, access to affordable nutritious food, and access to social and public services in addition to health care.”

As before, this clearly points to the elements of the virtuous cycle in question; and it is possible to navigate through policies such as 3C.20 and 3C.21 – on walking and cycling, respectively – that highlight safety issues, policy 3D.11i on children’s play and informal recreation strategies which highlights the importance of well-being, and the many policies addressing environmental issues. Links to participation and diversity, too, are numerous. For example, paragraph 3.62i states:

“The provision of relevant facilities, good public transport, particularly in areas of low car ownership, skills development opportunities, and addressing other barriers to work, including childcare, that can help people secure a route out of poverty are essential to tackling discrimination, exclusion and health inequalities.”

It is once again possible to envisage a positive future: new housing schemes in the Thames Gateway are designed and built in such a way that the housing itself, the safety and security of the public realm and the integrated provision of transport services (notably the provision of cycle paths and walking routes) contributes to a strong sense of well-being within the diverse communities that choose to live there. The health of the individuals within these communities improves as a result, further promoting inclusion and well-being. With new benchmarks set, further waves of housing development need at least to meet the standards set, further accelerating the initial improvements.

Equally, mediocre housing schemes, built in poor locations to tight budgets, built quickly and to poor specifications, without proper provision of adequate social infrastructure, will compromise safety and well-being and may well promote community development that is the very opposite of inclusive.

Once again, the responsibility for such a future would not lie simply with the London Plan, but with the multiple stakeholders that between them had failed to grasp the interconnectedness of their plans and actions – as with the previous imagined example, the difference will come about if the various actors and stakeholders are not merely *encouraged* to act, but are proactively *enabled* to adopt more sustainable practices.

IV Supporting Implementation

We have argued that, against a background in which – in our view – the Further Alterations already contain many of the most important principles of sustainable development, the key focus needs to be upon the manner of its implementation. We have argued that such implementation can best be assured through the concept of virtuous cycles, which we conceptualise as an integrated, pro-active process for delivering sustainable development.

There are, in our view, two main elements that need to be included in an effective implementation plan for the Further Alterations.

Firstly, a tailored support programme, of the kind exemplified by that developed by the London Energy Partnership. Such a programme would need to contain good practice examples, “How To” guides, roadshows, presentations, on-line support and so forth. In our view, the resources needed for this are both within the remit of the Greater London Authority Act 1999, and should be given the highest priority by the Mayor.

The key word here is “tailored”. Users of the Plan are not homogeneous, as the Further Alterations acknowledge. As Section 6.6 puts it:

“[There is] a multitude of individual decisions and behaviours about, for example, which form of transport to use or what form of waste disposal to select. Accumulatively, these will be of immense importance in achieving the plan’s objectives”

The heterogeneity of users makes it essential that implementation support programmes are tailored to users. This is far more than ensuring that reports are available in a variety of languages; this is about understanding and appreciating that different elements of the Plan need to be available to different groups at different times and in different formats.

(We have not done detailed work on the content of such programmes, but the Commission would be delighted to offer help and advice to the Mayor during both the design and delivery of such programmes.)

Secondly, and finally, we believe that an implementation programme needs to be *targeted*. This may seem unpalatable in the first instance: the tenets of inclusivity make it clear that all should have access, on an equitable basis.

However, large scale educational, housing and transport projects are underway now. Others are imminent. Particular locations are the subject of specific developments, both in the Plan and in the real world. They are individually identifiable.

These places and projects should be the immediate focus of implementation support. The buildings under construction in the Thames Gateway, under the auspices of the Building for Schools for the Future programme, within the capital programme of the NHS in London – as well as the Olympics – will be with us for the next century. It is essential that the principles of sustainable development are embedded in these schemes. Allied to the thinking of virtuous cycles, the Further Alterations provide the ideal opportunity to ensure that this takes place.

Closing Remarks

In summary, our submission in respect of the Further Alterations to the London Plan calls for action or amendment in three areas:

- **A “clear steer”** – the paradigm shift required to position sustainable development at the heart, not just of the London Plan, but of the myriad choices through which the Plan’s objectives will be realised, requires clearer statements on the priorities within the Plan.
- **Virtuous cycles** – virtuous cycles represent the ideal vehicle for promoting and achieving the paradigm shift we believe is required. Whilst we are pleased that virtuous cycles are already embedded within the Plan, we believe that they should be more explicitly and clearly positioned within the Further Alterations, both in “big picture” terms at the beginning of the document, and by means of examples elsewhere.
- **Implementation** – for the full potential of the Further Alterations to be realised, a programme of implementation is the highest priority. We call on the Mayor to ensure that adequate resources, capacity and will are in place to devise, support and deliver an implementation programme that reaches well beyond the traditional planning community.

In addition, we have highlighted that the SA/SEA methodology and subsequent report is ground-breaking, and that we expect this approach to influence future SA/SEAs in the UK and in London.

ATTACHMENT

London Sustainable Development Commission (LSDC): response to London Plan Review Statement of Intent. March 2006.

General

The Commission welcomes the opportunity to comment on the Statement of Intent (Sol) for the Review of the London Plan. The Commission was involved in the production of the existing London Plan (appearing at the Examination in Public) and considers that the Plan makes an important contribution towards sustainable development, in particular: increased provision of affordable housing, investment in key infrastructure improvements, measures to restrain car use and improve air quality, promotion of development close to transport nodes and improved recycling of waste.

However, we are disappointed that the Sol fails to meet the Mayor's ambition in terms of driving the changes required to transform London into the world's premier sustainable city. There needs to be a clear paradigm change rather than step-change if we are to meet the pressing challenge of sustainable development and become an exemplary sustainable world city.

The challenge faced by society in achieving sustainable development is brought into sharp focus in a world city like London, where human impact on the planet is considerable, yet where compact, communal living offers perhaps the greatest opportunities. The Commission feels strongly that the London Plan Review with its timescale through to 2025 offers a unique opportunity for London to show world leadership and make the courageous choices desperately needed to meet the challenges of sustainability.

In paragraph 28 of the Sol, the Mayor states that he wishes the London Plan policies *"to be radical where the evidence suggests the challenge facing London is greater or more intense than previously considered"*. The Commission believes that the challenge of sustainability meets this test.

London runs the risk of falling behind in its desire to be an exemplary sustainable world city if it fails to adopt a more integrated, radical approach. The Mayor has talked at length about China and its decision to build green cities, ironically using London sustainability expertise.

The approach adopted by the London Plan to date, and set to be extended by the Review, is one built on the pursuit of the seemingly parallel goals of economic growth, social inclusivity and environmental improvement. As explained fully in the Sol, this approach has:

- not allowed all Londoners to benefit from the city's success
- led to falling employment rates (lowest level of employment of all the regions)
- maintained continued high levels of poverty particularly among children (a larger proportion of children in workless households than any other region, the highest child and pensioner poverty in all the regions (after housing costs))
- led to a lack of an appropriate indigenous skills base and the lowest proportion of 19 year-olds with level 2 qualifications or above in all the regions;
- led to the highest levels of burglary, vehicle theft and robbery in the regions;
- led to low levels of household waste recycling (London ranked eighth compared to the other regions) and concerns over meeting waste targets;
- continued high CO₂ emissions from domestic sources;

- led to concerns about meeting air quality targets;
- led to London being ranked ninth of the regions in terms of both biological and chemical water quality;
- led to concerns about housing quality and supply (at the end of the first quarter of 2005 there were 61,990 households (up from 24,060 in 1997) in temporary accommodation in the region, 46,360 (75%) of which contained children.

Yet, the pursuit of these goals in parallel, distorts our view. London has the highest Gross Value Added (GVA) of all the regions – and is moving further ahead of the national average. London's productivity is the highest of all the regions both in absolute and percentage terms. So what is going wrong?

The Commission believes strongly that the London Plan needs to take a more integrative approach. We must prioritise solutions and forms of development that deliver integrated social and environmental objectives, as well as economic gain. We must champion principles, specifications and good design that drive these truly integrated virtuous cycles and deliver sustainable results.

This is the thinking behind the Commission's 'Sustainable Development Framework for London'. Rather than blindly continuing the silo approach to economic, social and environmental issues, the Commission sought to fully integrate these issues in a set of 15 objectives grouped under the 4 stages of 'taking responsibility', 'developing respect', 'managing resources' and 'getting results'. The Framework is written in a form that can be used by individuals, families, community groups, organisations and investors to examine how they can contribute to improving Quality of Life

To assist the London Plan team's thinking in this respect we have developed the following virtuous cycles approach which should apply to the London Plan and drive integrated sustainability planning. The Commission would be happy to develop this approach further with the London Plan team.

Virtuous cycles

Annex 1 shows an example of virtuous cycle thinking, based upon the Commission's headline quality of life indicators. Similar models are in current application elsewhere (e.g. in Arup's work developing new green cities in China). Most virtuous cycles feature 'sustainable technologies' and 'improved health' as outcomes, with resource efficiency savings driving further application of sustainable design.

To apply this thinking to planning and design, objectives need to be set for each indicator or theme, which can then be developed into design specifications, e.g.

Indicator	Objective
Traffic volumes	Modal shift to public transport
Crime	Promotion of pedestrians/people on the streets reduced crime
Bird populations (biodiversity)	Access to wildlife and green space
Decent housing/design	Mixed use, better work life balance

Appropriate virtuous cycles for the London Plan are:

1. SUSTAINABLE DESIGN

- use of green (vegetation) and sustainable design
- improves biodiversity
- resource efficiency (reduced consumption e.g. water, energy)
- clean energy
- improved health

2. TRANSPORT AND AIR QUALITY

- air quality - reduced (zero) emissions
- transport for everyone
- community energy sharing
- compact design – more walking and cycling
- improved health

3. ENERGY

- inclusion - tackling fuel poverty – health benefits
- social benefits and costs
- distributed network energy – CHP
- biodiversity benefits (green roofs, open spaces)
- hydrogen generated locally and renewably
- green industries
- democratic control, self sufficiency (security of supply)

4. VIABLE COMMUNITIES

- viable mixed use communities
- safe and diverse
- employment satisfaction – work life balance
- healthier communities
- accessible services
- more money in local economy
- resource efficiency
- sustainable technology growth

These virtuous cycles relate to some of the thinking set out in para 87 of the Sol, (e.g, the compact city land efficiency approach) but go much further.

Detailed issues from the Statement of Intent.

a) Need for an integrative approach.

Currently, the Plan is built on the Mayor's vision of "*three parallel but mutually reinforcing themes*" (para 90). Unfortunately, as much of the text admits, these themes have been pursued in parallel and haven't been mutually reinforcing. The pursuit of strong, long-term economic growth, based on the business/financial services sector model has not delivered social inclusivity – in fact it has made it worse (paras 66 to 73 – poverty and social justice). Similarly, London's environment and its ecological footprint is not improving and we are in danger of not meeting EU targets (e.g. on air quality and waste).

New government strategy on sustainable development 'Securing the Future' sets out guiding principles for the UK. These are the 2 goals of 'living within environmental limits' and 'ensuring a strong, healthy and just society', to be achieved by three underpinning levels of achieving a strong economy, promoting good governance and using sound science responsibly. Using this new national strategy would 'relegate' economic development to a means (of achieving a healthy and just society etc) rather than a goal in itself. The national strategy sees a sustainable economy as one which provides opportunities for all, and in which environmental and social costs fall on those who impose them (polluter pays) and efficient resource use is incentivised.

b) Economic and employment. The review continues the London Plan economic analysis and policies. How will this 'business as usual' approach:

- Reflect the new national sustainable development strategy priority of sustainable production and consumption? (*'We need a major shift to deliver new products and services with lower environmental impacts across their life cycle, while at the same time boosting competitiveness'*).
- Deliver social inclusivity (e.g. para 45). The Sol is not clear how the revision will do things differently to ensure that we don't get more of the same. For example, given the scale of London's problems (e.g. childhood poverty) the statement on page 31 that "*a number of comparatively modest issues are therefore proposed for Review*" is surprising in the extreme and fails to deliver the Mayor's 'radical approach' where evidence supports such a tactic.
- Help to up skill existing Londoners, rather than relying on jobs for skilled migrants. The Sol focuses on attracting skilled labour/suitably qualified people, rather than up-skilling existing residents.
- Deliver economic security – given the economy is so reliant on business and financial services.

c) With continuing population growth, the challenge of creating sustainable communities becomes greater. E.g. London is losing families and gaining single, skilled immigrants.

d) Housing. We question the statement 'more housing in an area is not, therefore, the enemy of job creation, rather it is the driver of it' (para 52). Surely it's the other way around – job creation drives new housing. Plenty of examples of house building creating sink estates because of the lack of jobs in an area. Even more important than this is the quality of housing and associated development in meeting sustainability targets. For example, in housing section (page 30) no mention is made of the imperative to make housing deliver on environmental objectives.

e) Environmental imperative and climate change. It is essential to model future scenarios for the London Plan review using economic and social data to predict environmental impacts. This is particularly important for climate change – such quantitative work should be done alongside the qualitative sustainability appraisal work. This is linked to Sol section on high level scenarios and sensitivity testing (para 81).

f) Poverty and social justice. Sol is not convincing in its response to London's shocking poverty statistics – if we are continuing with our current economic model how can we expect things to improve? For example, given the scale of London's problems (e.g. childhood poverty) the statement on page 31 that "*a number of comparatively modest issues are therefore proposed for Review*" is surprising in the extreme and fails to deliver the Mayor's 'radical approach' where evidence supports such a tactic.

g) West End. Is it sustainable to continue to bolster the West End offer when market forces are strengthening local centres – is it not more sustainable to support a range of local centres to relieve pressure and congestion on central London?

h) Para 89 – sustainable development is not environment!

i) There remains a major challenge to make tourism more sustainable (including Olympics).

j) Consideration could be given to driving the need for statements of skill and resource needs at the planning stage for major planning applications, as was done for the Olympics. This would provide a route map for skills and resource needs in the future in London that would enable training and supply chain needs to be clearly identified for action by public and private sectors.

k) Not enough attention is paid to the need to update the environmental performance of existing infrastructures. This is one of the major challenges facing London. This could be driven using innovation funding by the public and private sectors in partnership.

Peter Head, Chair Planning and Development Sub Group, 1st March 2006.