

LONDON SUSTAINABLE DEVELOPMENT COMMISSION (LSDC)

RESPONSE TO THE LONDON PLAN IMPLEMENTATION PLAN 1 – CONSULTATION DRAFT

Introduction

The London Sustainable Development Commission (LSDC) was established in 2002 to advise the Mayor of London on ways to make London a sustainable, world-class city. The Commission is an independent body advising, supporting and challenging policy makers to promote a better quality of life for all Londoners, both now and in the future, whilst also considering London's wider global impacts.

Background

The LSDC strongly supports the idea of an Implementation Plan (IP) to show how the policies in the London Plan will be put into action.

In practice, this first edition is more of a contextual document, identifying the pressures up to 2031 (e.g. population growth), the gaps that exist (e.g. waste management provision, sports facilities), and possible opportunities. It is nonetheless a valuable compendium.

It does not at this stage have the Key Performance Indicators (KPIs) which will enable the effectiveness of the plan to be measured against the mayor's targets (e.g. for carbon dioxide reduction, waste management) or aspirations expressed in the policy documents. We understand that KPIs will follow the Annual Monitoring Report. We believe they are essential to understand the fuller picture and cross referencing between the two would be helpful in future.

Coverage

The document describes, helpfully, in the text and in Annex 1, the institutions and organisations that are involved in delivery. The problem here is that ownership is often diffuse, so that leadership and accountability are difficult to pin down. This will make effective implementation much harder. The problem is also intrinsic to the KPIs. Unless the actions in the IP are "owned" by an individual or organisation, they will be harder to manage successfully. This may not be possible in a number of cases, but where it is, it should be done.

There are some important gaps in coverage. While transport is addressed, the treatment of such issues as modal shift in general, and walking and cycling in particular, is brief, despite their potential role in reducing private motor vehicles with benefits to health, air quality, roads and cost. Of course these issues are covered in policy documents and the KPIs, but the IP should address the significant spatial implications that arise.

The implications for London of population growth on existing and planned housing, including affordable housing are largely absent. Where people are encouraged to live will have implications for transport, energy and water use, air quality and the positioning of office, factory and retail development. In short, housing should be covered so as to address the inter-relationships between housing infrastructure and other provision.

In this context it would be useful to record some of the emerging thinking of the Outer London Commission.

The Mayor's carbon strategy is alluded to but it is not clear what contribution each part of the IP or indeed the IP as a whole will make to meeting the target. Some reference to the problem of embedded carbon should, we believe, be made. In much the same way as the Mayor wants London and indeed individual Boroughs to resolve their own waste problems within their own borders, so we will be expected to account for, and seek to reduce, the carbon embodied in the products we buy from abroad.

Air quality, which is one of the most intractable problems for Londoners - 4,000 deaths a year¹ - will be influenced by transport and energy generation decisions. We see value in drawing attention to the cross cutting implications of, for example, cleaner energy generation and a modal shift on health.

On green infrastructure, the value lies not only in creating new green spaces and improving access to them, but also in encouraging people to use them. As the LSDC's recent report, *Sowing the Seeds*², demonstrates, access for children is particularly important and could usefully be referred to in the relevant section of the IP.

Conclusion

This is a very useful document, which has the potential to make a major contribution to delivery of the London Plan's ambitions. But there are some significant gaps which we believe should be addressed in the next iteration. We look forward to this and to the presentation of the KPIs in the Annual Monitoring Report.

¹ http://www.london.gov.uk/sites/default/files/Health_Study_%20Report.pdf

² <http://www.londonsdc.org/lcdc/research.aspx>