

LONDON SUSTAINABLE DEVELOPMENT COMMISSION

RESPONSE TO CONSULTATION ON A NEW PLAN FOR LONDON

JUNE 2009

1. Introduction

1.1 The LSDC is grateful for the opportunity to comment at this stage on the Proposals for the Mayor's London Plan (April 2009), and on the Scoping Report for the Integrated Impact Assessment.

1.2 We are pleased that it has been possible to address many of the comments raised by ourselves and others in the consultation on 'Planning for a Better London', including the concern that the new emphasis on outer London should not be to the detriment of meeting the needs of central and inner London.

1.3 We are also pleased that so much progress has been made in the approach to the IIA in response to the current work by the LSDC, particularly with regard to the presentation of material in a way, which is going to make it much easier to understand the likely impacts of the overall Plan.

1.4 There are several outstanding issues that we will want to monitor as policies and proposals are developed over the coming months, for instance in relation to affordable housing and specific transport solutions.

However, we do have a fundamental concern that we think should be considered fully at this crucial stage in development of the Plan.

1.5 There is need for a fundamental re-thinking of the way in which the economy of London will have to work in order to meet the major challenges of the next two decades. The LSDC would question some of the assumptions regarding the economy that are contained within the plan. As indicated in our own latest research, the economy directly contributes to London's high levels of resource consumption. The current levels of resource use are unlikely to be sustainable both from an environmental and an economic perspective, beyond the short term. They are more likely to contribute to both a reduction in the planet's critical natural capital and irreversible climate change. Over and above the costs of not tackling climate change (as described by Lord Stern), any increase in demand for those very same resources (resulting from any global return to business as usual) is likely to see rising commodity prices, which could in

themselves, undermine any attempt to make economic recovery sustainable in all meanings of this word.

1.6 There is also a growing body of evidence, which suggests that recent economic growth in some developed countries (including the UK) has not resulted in the type of improvements in quality of life that we would expect. Irrespective of the reasons for this we know that not everyone has benefited from London's economic growth since the mid 1990's, with significant inequalities both in terms of income and health for example. Therefore only if London functions very differently will it be possible to:

- Meet the need to reduce carbon emissions within the timescales required by the UK, EU and in particular those set by London's Climate Change Action Plan;
- Reduce the adverse impacts of the current patterns of consumption and production not only on the environment but also on society and the economy;
- Adapt to climate change so as to minimise the significant impacts of the changes that cannot now be avoided;
- Reduce the inequalities in income, health and quality of life that adversely affect social cohesion within London;
- Deliver an economic recovery which is sustainable over the mid to long term

1.7 Although some of the solutions to these problems will have to follow international agreement, the London Plan and the Mayor's associated strategies provide the main opportunities to set the long term goals for London that will deliver the above outcomes and provide the necessary framework for their delivery. It is vital that we get this right.

1.8 They will also have influence on the international scene given the tendency for London's response to such matters to be regarded as a signal of how to act.

1.9 In the sections below we summarise the research and analysis that LSDC has been undertaking - that underlines the need for change; suggest how the vision for London could be strengthened; and outline the policies and proposals that could support the realization of this vision.

2. An Evidence Base

2.1 There are several strands of research that LSDC has been able to pursue over the past year in particular, and which underline the importance of fundamental change:

- London's Quality of Life Indicators: our June 2009 report indicates that there are two fundamental long term issues to be addressed – the consumption of resources and the resulting drag on the economy, and the erosion of community cohesion.
- Income Inequalities: the report, due to be published as a discussion document in October 2009, suggests that economic growth in wealthier countries has ceased to be a reliable source of higher standards of well being, and that inequality in income is closely associated with high rates of many social problems in London as elsewhere.
- Sustainable Consumption and Production: the report, due to be published in September 2009, clarifies the range of changes that need to be undertaken in the cycle of production and consumption to reduce carbon dioxide emissions and London's carbon footprint – including issues related to embodied energy in buildings and waste production and reuse.
- Understanding Air Travel – The LSDC have researched the 'Impacts of Air Travel on London' and found that London's economy is less reliant on air travel than previously thought and that Heathrow can remain a major airport without an extra runway.

2.2 The LSDC intends to use the launch of these documents to generate a debate on the economy of London over the coming year. ***We would like to take the opportunity to discuss the main findings with the London Plan Review team at the earliest opportunity*** to enable the issues to be taken on board in the preparation of the Plan.

3. Vision and Objectives

3.1 The LSDC considers that the six objectives provide a useful guide to what the Mayor hopes to achieve through the London Plan. However our contention is that the vision needs to be stating more clearly what London would be like if these objectives were to be achieved.

3.2 This vision needs to be placed in the context of the requirements to meet carbon reduction and climate change targets that have been set within London as well as nationally and internationally. Unless the primacy of these matters is fully acknowledged and the particular contribution of London clarified it is unlikely that London will be able to fulfill its role or become a world leader on these issues.

- 3.3 The Plan should also clarify how London would function more sustainably so as to improve the quality of life of all who will live and work there. This means describing the elements of daily life that will be changed over the next two decades, for example: how all homes will be energy efficient and able to deal with issues such as water use, heating and cooling needs; how neighbourhoods will provide for the full range of local needs in terms of open space, shopping, waste re-use and energy production; how main centres will provide for a full range of employment and recreation that can be easily accessed by non-car modes, with appropriate servicing to limit carbon production.
- 3.4 The Plan would also need to clarify how London could function as a whole and in relation to its wider hinterland, for example: the use of virtuous cycles of resourcing, production, delivery, consumption and re-use within the wider economy; the role of a wider range of skilled and semi-skilled jobs and training to ensure that the opportunities for local innovation are developed in this context.
- 3.5 ***We would be pleased to share more of what a sustainable vision for London and its economy could be like and its practical outcomes.*** We believe that unless there is a clear vision of this kind then it will not be possible to place the different policies, proposals and initiatives in context, or inspire the wider changes in business and personal practice that will be necessary to enable implementation of, and sustain support for the Plan.

4. Policies and Proposals

- 4.1 Many of the individual elements of a Plan to address such a vision are already in place – for instance the mention of freight consolidation centres, and encouragement of greener businesses. Notwithstanding the fact that this is an early iteration of the Plan, the policy framework within any subsequent iteration needs to consider inter alia:
- Infrastructure provision: there is need for a proactive provision of London-wide and sub-regional infrastructure to support a major change in direction for London and its economy – including the implications for enabling delivery of social and economic infrastructure that will help tackle inequality as well as water, waste treatment, food, energy generation and supply, IT networks and a wider green link system.
 - Retrofitting of neighbourhoods: there is need for changes to the existing building stock as well as in the designing of new stock so that requirements for heating, lighting and cooling are all achievable by more sustainable

means; changes are also needed in the localities in relation to local generation, mix of uses, and provision of local facilities.

- 4.2 These changes could provide the foundation of a major shift in the economy of London, giving the opportunity for new methods of investment and greater economic diversity, changes in general business practice (enabling, for example, resource efficiency within sectors such as retail and tourism), and a wider range of employment and skills. ***We would like to talk with the London Plan Review team about some of our thinking and experience in these areas.***

5. Conclusion

- 5.1 Our view is that a clearer long term vision of what London could be like in 2031, and re-consideration of how an economy could be developed to provide a sustainable means of realising this vision, would make a significant difference to the ability of London to meet the six objectives set out in the Proposals for the Mayor's London Plan of April 2009. Arrangements for an early meeting to discuss these issues would be welcomed by the LSDC.