

London Sustainable
Development
Commission

**Planning for a Better
London**

Final Response

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Contents

	Page
PLANNING FOR A BETTER LONDON	1
1 Introduction	1
2 Approach (from Section 1 of Document)	1
3 Key challenges (Section 2 of the Document)	2
4 Key policy responses (Section 3 of Document)	2
5 Conclusions	5

Appendices

Appendix A

Summary of Policies and Initiatives in Terms of Sustainability

PLANNING FOR A BETTER LONDON

1 Introduction

This note was written as a basis for consideration as part of the consultation for the “Planning for a Better London” document produced by the GLA. The response from the LSDC has been drafted on the basis of discussion at the Planning and Development sub group and at a full Commission meeting.

2 The Mayor's Approach (from Section 1 of Document)

Questions:

- Is the approach to planning the right one?
- Does it strike right balance between local and strategic issues?
- Are there other things that could be done?
- Is there support for the LPC?

LSDC Commentary:

The LSDC has concerns regarding the dropping of targets (e.g. for affordable housing) on the basis that it may be more difficult to achieve change particularly in Boroughs that are lagging behind. The issue is bound up with the role targets have had since the 1990s in helping to achieve sustainable outcomes. The LSDC is concerned that monitoring of the scale of provision in relation to need is not neglected (see also Section 4 below).

The LSDC believes that targets (e.g. renewables targets) and minimum standards (e.g. for per capita water use) give developers certainty and encourage innovation and novel solutions. Guidance alone will not give developers the certainty they need and leaves too much detail left to SPG documents, which whilst necessary to flesh out some of the detail of the intention of strategic policy, also carry less weight.

The LSDC's view is that careful consideration needs to be given to the issue of dropping targets. The monitoring of the current London Plan's targets and their effectiveness in driving change needs to be assessed and undertaken e.g. in relation to renewable energy. Targets are particularly useful in helping those boroughs that are reluctant to drive change and are risk averse to moving forward.

There is concern that the document expresses the desire to slim down the London Plan, and move some of its contents to planning guidance documents. Whilst the Mayor's Spatial Development Strategy (i.e., London Plan) should not get bogged down in minutia, it is also critical that it remains sufficiently comprehensive so its strategic weighting is not lost. A sustainable development approach to spatial planning also requires important linkages to be made between issues to avoid them being dealt with in isolation. Whilst moving the expression of certain policies and actions into SPG is relevant in some instances, the LSDC are cautious of any large scale movement of climate change policy from the Plan to Guidance, due to the lesser statutory weight carried by SPG. Further to this, the LSDC are concerned that the current sentiments expressed in the document indicate that the Mayor will also refrain from necessarily using the powers given to him. Whilst the LSDC accepts the need to keep the focus of the Plan at a strategic level, there is still the need for the Mayor to use his powers in such a way that his own targets in both the Plan and his other statutory and non-statutory strategies can be met.

There is also an additional challenge when moving from targets to outcomes. An outcomes focussed document will need effective indicators and monitoring to determine real progress.

The issues of the potential neglect of areas of greatest deprivation, in the context of increasing policy focus particularly on outer London, is one that is of particular concern to the LSDC. The issue needs to be considered in the context of the fourth key challenge on ‘planning for all’ listed in section 3, and is considered more fully in section 4.

The continued emphasis on evidence based policy making is welcomed by the LSDC, and is consistent with its aims in assisting the GLA in the development of policies and initiatives

in relation to sustainability implications. There are important opportunities for the LSDC to assist in the changes being considered: early involvement in SPG, BPG and IR; and assistance with LPC, including influence on the agenda for the revision of the London Plan.

3 The Key challenges (Section 2 of the Document)

Questions:

- Have key challenges been identified?
- Are there others that need to be addressed?

LSDC Commentary:

We support the proposal for a consensual approach and working with organisations across London from the public and private sector that need to work together to deliver sustainability through economic progression in London. However the Plan makes a basic assumption on economic and population growth that is no longer clear. The relationship between economic progression and sustainable consumption needs to be better understood.

An additional challenge is achieving increased sustainability by taking account of all the other challenges (economic growth, environment and social aspects), and developing solutions that assist all these aspects. For example in the face of rising commodity prices, competition from new economic powerhouses, diminishing natural resources, the requirement for adequate action on climate change, and the increased polarisation between the rich and the poor within the capital, one of the key challenges facing London is developing a more resource efficient economy from which everyone can benefit. Developing such approaches is consistent with delivering economic and environmental benefits in terms of resource security, reduced emissions and competitive advantage, and will also enable London to tackle some of its persistent social problems such as income inequality, worklessness, fuel poverty and obesity.

There is a need to integrate thinking so that solutions are sought in relation to, for instance, provision of green infrastructure and addressing poor environmental quality, at the same time as proposals for particular developments are being explored. This means, for example, that an economic strategy would address resource management issues and that a housing strategy would address retrofitting in terms of water efficiency.

During the current economic correction there is opportunity for there to be a change in emphasis on social and environmental elements of sustainability as well as addressing the economy difficulties. The downturn provides a clear moment to challenge our perception of economic progression primarily through increased consumer spending. There is considerable groundswell of opinion indicating support to reduce the carbon intensity of our spending to a fraction of what it is now and to use this to find new ways of creating prosperity. It is clear that at present society has a limited understanding of how such a radical transformation can be possible to match this growing aspiration¹. However in London, the opportunity exists with the strong leadership of the Mayor and the Plan to explore and find a way forward.

These challenges, including the sustainability dimension, have been used in this note as a basis for assessment of the policies and initiatives (see section 4 and Appendix A).

4 Key policy responses (Section 3 of Document)

The table in Appendix A provides a summary of the main policies and initiatives listed in the document, grouped under the headings of the key challenges. Those policies and initiatives that represent a significant departure from previous policy are marked with an asterisk. For each proposal or initiative, comments are provided to indicate where the proposal could bring a possible advantage or disadvantage in terms of sustainability.

Questions:

- Do policy responses adequately address the challenges?
- Should other responses be considered?

¹ See <http://www.newscientist.com/channel/opinion/mg20026786.100-special-report-why-politicians-dare-not-limit-economic-growth.html>

How to balance meeting challenge of growth with improving quality of life? – This is the classic problem that can only be addressed by addressing sustainable development opportunities (see section 3 above).

LSDC Commentary:

The provision of information and specialist advice across London to support policy-making, monitoring implementation, evaluation and review is welcomed. The latter is important considering that the changing environment within which they must now continue to operate is different from that which would have been expected, based on the nature of the challenges spelt out in the Plan text. There would be a role for the Mayor in addressing problems that face all bordering regions, not just London.

Of the more established proposals, there is only one where there may continue to be some concern regarding sustainability outcomes: the high standard of design and construction (Policy Response 3 in Appendix A) does perpetuate concerns about costs and affordability. However, the proposal is central to reducing the long-term impacts on climate change. The LSDC continues to support both this proposal and all other continuing initiatives (e.g. Olympic legacy Policy Response 22).

New Policies/Initiatives: Society (Key Challenges of Population Growth and Planning for All)

Two of the new proposals related to societal issues have the potential to address major sustainability concerns that have been pursued by the LSDC: setting up of a seminar on housing (Policy Response 5), and a BPG on designing out crime and anti-social behaviour (Policy Response 24)). The Commission will be able to contribute positively to these initiatives from its experience and knowledge of these areas of work. The only question is related to the speed with which these proposals are pursued - with, for instance, the BPG not being addressed until 2010. It is possible that LSDC could assist in bringing some of this work forward, and assist with the development of the Housing SPG.

The other two new initiatives are more difficult because of the potential for adverse effects:

- The issues related to removal of affordability targets (Policy Response 1) are complex and impacts difficult to assess, but there is potential for a growing disparity between need and provision in some Boroughs; and the emphasis on shared ownership rather than renting could exclude the poorest people.
- The issues related to the introduction of Parker Morris (room size) standards (Policy Response 2) are similar to those considered above regarding Policy Response 3, in that the increased costs may reduce affordability. However a new emphasis on larger homes would help to provide an improved balance of housing stock better able to meet the needs of families and improve long term flexibility of housing provision.

In relation to the social challenges, it would be particularly helpful to redefine the approach so that for instance accessibility in neighbourhoods is given greater consideration by seeking solutions in terms of accessibility planning rather than transport planning.

New Policies/Initiatives: Environmental Quality

Three of the new initiatives covering environmental issues deal with concerns that have been undertaken and will continue to be controversial:

- Successful opposition to the third runway at Heathrow (Policy Response 13) could have benefits in terms of potential relief to the growing parts of London affected by Heathrow operations especially, but not limited to, parts of west London; there is little question that an airport to the east would improve economic performance in the more deprived parts of London just as any significant development proposal would be expected to create new employment and economic opportunities. Whether a new facility would pass the sustainability tests (economic, social and environmental) is another matter.³ The LSDC could assist in early studies, picking up the issues taken into account in earlier work it has undertaken. Expansion of City Airport also needs to be looked at closely in the context of integrated transport rather than just meeting economic growth models (ref: LSDC report – The impacts of air transport on London).

- The protection of domestic gardens from housing development (Policy Response 16) would preserve environmental quality particularly in lower density suburbs, but could make it difficult to achieve housing objectives including the 50,000 affordable homes (Policy Response 1). The seminar on housing (Policy Response 5), to, which the LSDC could contribute, should cover these related issues.
- The reversion to earlier high buildings policy (Policy Response 19) would have environmental benefits in terms of preserving views and local scale, but concentration of tall buildings in a few centres may have impact on local congestion. The LSDC requests that study of the capacity of public transport systems in areas of concentration should be undertaken to ensure access improvements are undertaken in step with development (with appropriate infrastructure funding).

The fourth new proposal is less controversial: introduction of a cycle hire scheme (Policy Response 14). Implementation may be difficult in the context of experience in other major cities. However this proposal is at too detailed a level for a strategic document – a fact noted for other parts of the document also where there is a mixture of strategic policies and initiatives coupled with small-scale projects.

In relation to the environmental challenges, it would be helpful to relate the improvements to areas of poor environmental quality to the opportunity to improve quality of life/long term sustainability – for instance the impact of green roofs in terms of potential direct usage as open space as well as for climate amelioration.

New Policies/Initiatives: Economic Growth

Two of the new initiatives relate to use of s106 to provide for affordable smaller shops in major retail developments (Policy Response 10), and to support Crossrail (Policy Response 11). The latter is specified as a priority involving an early alteration of the London Plan. Both would help provide for important infrastructure in London, although the impact on funding for other important provision to increase sustainability will need to be monitored.

Three of the proposals could have beneficial effects in the areas targeted, but could also have adverse effects. The Outer London Commission (Policy Response 7), and the planning framework for Central Activity Zones (Policy Response 8) could have benefits in the areas targeted, but could lead to resources being transferred from areas of greatest need (particularly areas of inner London). Similarly the development of employment in outer London town centres (Policy Response 6) could have benefits locally as long as the centres are well connected by public transport but could divert resources from elsewhere in greater need.

In relation to the economic challenges, it would also be helpful to make sure that economic benefits of the environment are taken into account. For instance it would be useful to see woodland planting as an economic focus in helping to reduce the costs of water management (proposed SPG on trees and woodland). It would also be feasible to use procurement opportunities to drive up standards and outcomes.

London is vulnerable to rising commodity prices and to the pressures of climate change both directly and in terms of disruption to supplies such as food. Recent reports by Stern and McKinsey highlight that the costs of managing our response to climate change now are not a danger to economic growth, but that the costs will be much higher in the future without rapid, concerted action appropriate to the scale of the task. Developing the right approach to both consumption and production will enable London to seize the commercial opportunities that will emerge on the pathway to a low carbon, resource-efficient economy.

The LSDC suggests that the GLA should explore the opportunities for the London Plan to deliver such a 'resource efficiency' led approach to economic activity which will also enable London to meet its ambitious targets to reduce waste as well as reducing the pressure on landfill sites in surrounding regions. Creating the opportunities to locate the kind of technology involved within or outside London presents a clear opportunity to create wealth and jobs.

Such an approach can also bring social as well as economic and environmental benefit. Investment in manufacturing and remanufacturing industries can, for example, help to recycle the capital and jobs required to address the wealth gap within London.

5 Conclusions

The LSDC has considered for some time that the social aspects of sustainability in relation to quality of life have been comparatively neglected, and is therefore pleased that these concerns are articulated in Planning for a Better London, and that there are some new initiatives to address the issues.

The LSDC will be pleased to assist with the establishing of the London Planning Convention, the seminar on housing, the development of a new Housing SPG, and the BPG on crime and anti-social behaviour.

The LSDC would be particularly concerned, in this context that effort is made to ensure local organisations and communities are able to take a significant part in these initiatives. The LPC in particular could be daunting if it is arranged in a single large chamber with set speakers. It will be important to allow for smaller group discussions and to provide for the continued capacity building of local organisations and communities.

The LSDC would hope that its role in the above initiatives would make it possible to influence the mechanisms to be put in place in relation to affordability, introduction of Parker Morris standards, and the potential impacts of the policy instruments aimed at improving the environment and economy of outer London in the context of areas of greater deprivation.

There would also be significant advantage in integrating the evidence base (TfL, GLA etc) with work being done at universities in the UK and abroad. The LSDC, with its experience related to the London Sustainable Development Framework, and its links to the Institute for Sustainability in the Thames Gateway and the research community generally, would be in a strong position to help.

Understanding the business case, social and environmental benefits of a resource efficient approach in London should inform the development of the Plan and would be something to which the LSDC could contribute.

LSDC's conclusion is that in the context of such an approach and related participation (and that of other appropriate interest groups), it will be possible to address the issues related to the full range of challenges facing London.

Appendix A

**Summary of Policies
and Initiatives in Terms
of Sustainability**

SUMMARY OF POLICIES AND INITIATIVES IN TERMS OF SUSTAINABILITY

Challenge	No.	Policy Response	Sustainability issues	Sustainability issues
			Possible Advantages	Possible Disadvantages
Population growth	1	*50,000 affordable homes (especially shared ownership and intermediate housing) in 3 years through agreements with Boroughs; removal of targets from London Plan; new Housing SPG	A major objective to meet housing need	Possible growing disparity between need and provision in some Boroughs; emphasis on shared ownership rather than renting could exclude poorest
	2	*Parker Morris standards and provision of more family housing	Better suited to needs and greater flexibility of use over time	May increase costs and affect affordability of shared ownership homes
	3	High standard of design and construction (via SPG)	Potential to continue to reduce impact on climate change	Potential effect on affordability
	4	Higher densities where appropriate (e.g. at public transport nodes)	Increased proximity to facilities with access by walking and public transport	
	5	*Major seminar on housing to explore issues in detail and start implementation	Potential to identify useful policies and proposals	
Economic Growth	6	*Employment centres in outer London, based on town centres	Increased local job availability, with lower travel costs; reduced congestion into inner London	Increase in car use if not well connected by public transport Could lead to resources being diverted from areas of greatest need
	7	*Outer London Commission to advise on revision to London Plan and SPG	Potential to identify useful policies and proposals	Could lead to resources being diverted from areas of greatest need
	8	*Establish a planning framework dealing with issues facing the Central Activity Zones (via SPG)	If results in improvement then increased benefit	Could lead to resources being diverted from areas of greatest need
	9	Continue to support West End and town centre initiatives (via SPG)	If results in improvement then increased benefit	
	10	*Use of s106 to require provision of affordable small shop units in major retail schemes	Potential to enable smaller local shops to continue	Possible adverse impact on other provision by diverting funding
Environmental Quality	11	*Support for Crossrail via s106 funding (alteration to London Plan)	A priority for consideration in the context of the Community Infrastructure Levy	Possible adverse impact on other provision by diverting funding
	12	Higher densities close to Crossrail stations	Reduce need to travel by car	
	13	*Opposition to third runway at Heathrow. Consider all options for airport capacity in south east including new airport east of London	Potential relief to environment in parts of west London; potential for major economic boost to east London	Location east of London will have local and regional environmental impacts
	14	Strategic planning policy framework for cycling and walking, including cycle parking and *cycle hire; continued support for Legible London (BPG)	If results in improvement then increased benefit	Cycle hire: problems of implementation in other major cities
	15	Support use of Thames and other waterways for transport of people and goods (BPG)	If results in improvement then increased benefit	
	16	Support for Green Belt, MOL and local open spaces, *domestic gardens, and playing fields, working with London Boroughs (BPG and London Plan)	If results in improvement to quality of environment and access to open space, then increased benefit	Domestic gardens excluded from brown field category: potential impact on meeting housing objectives

Challenge	No.	Policy Response	Sustainability issues	Sustainability issues
			Possible Advantages	Possible Disadvantages
	17	Protect and promote trees and woodland including street trees (SPG)	If results in improvement then increased benefit	
	18	Support for micro-generation and on site renewable energy; and ground source heat on district basis (SPG)	If results in improvement then increased benefit	
	19	*Reversion to earlier high buildings policy (i.e. high buildings where existing clusters; preservation of view lines and World Heritage sites) (London View Management Strategy)	Preservation of local and strategic views, setting of buildings, and scale of local community	Concentration in fewer centres may have impact on local congestion levels
	20	Protect and enhance London's historic environment (London Plan)	If results in improvement then increased benefit	
Planning for all	21	Support in most deprived areas for local employment opportunities, suitable housing, social infrastructure, access to open space	If results in improvement then increased benefit	
	22	Make most of under-used and deprived areas in East London e.g. Thames Gateway with appropriate infrastructure	If results in improvement then increased benefit	
	23	Ensure realistic plans in place for Olympic legacy	If results in improvement then increased benefit	
	24	*Guidance on designing out crime and anti social behaviour (BPG). Including for existing owners and occupiers	Particular help in more deprived areas	BPG not likely before 2010
	25	*Implementation Report on London's geodiversity	To provide a greater understanding of London's geology	