



# **OUTER LONDON COMMISSION**

## **SEVENTH REPORT: ACCOMMODATING LONDON'S GROWTH**

### **EXECUTIVE SUMMARY**

**MARCH 2016**



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# EXECUTIVE SUMMARY

- 1 To inform preparation of a new London Plan, the Mayor asked the Outer London Commission to develop three work streams. The first was to explore and advise on collaboration arrangements with the Wider South East; the second was to identify and address barriers to housing delivery; and the third was to examine the challenges London faces from demographic and economic growth pressures, and to identify potential spatial strategies for responding to these in a sustainable fashion. This report presents the results of the third of these work streams.
  - 2 In broad terms, the Commission considers that the Plan's current philosophy and some of its policies require extension, including a stronger regional dimension. As they stand they are not in themselves sufficient to ensure that London can continue to develop as a globally competitive city providing an attractive 'quality of life' for its residents (including access to suitable housing). The Commission therefore suggests that in developing a new London Plan, the Mayor takes a threefold approach to accommodating growth through:
    - greater efficiencies in the way existing capacity is used;
    - sustainable intensification of selected parts of the city;
    - and partnership working to realise the potential of the wider metropolitan region
  - 3 In developing this approach, the Commission considered the economic and demographic trends which are driving change and some of the resultant planning issues which a new London Plan will have to address.
  - 4 In essence, currently available data suggest that future London employment growth could run at about a third higher than assumed in the 2015 version of the London Plan (at about 40,000 p.a.) while its population and households continue to grow at or (in the case of population) slightly below the rates assumed then. These would still be well above those assumed in earlier versions of the Plan. Even with slower population growth (of perhaps 65,000 p.a. to 2041) the annual increase in household numbers could still remain at about 40,000. In turn this could mean housing need remaining at around 50,000 pa if the backlog is addressed over 20 years.
  - 5 There are many uncertainties surrounding these projections, both in relation to the future trajectory of London employment growth, following the record expansion of some 700,000 new jobs since the financial crisis, and to future levels of migration. But this is the broad scale of growth for which London now needs to plan.
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6 These trends bear on a range of issues facing the new London Plan including:

- The existing Plan has been successful in bringing forward enough consented housing capacity to address London's objectively assessed need. Approvals have averaged more than 50,000 pa over a decade and the pipeline has grown steadily to 260,000 but only 25,000 pa have been delivered.
  - The planning system is likely to have to continue to bring forward this quantum of capacity (and perhaps more), but non-planning factors will have to be addressed if actual delivery is to be increased eg the number of 'active' sites needs to be increased; large sites may need breaking up; site ownership by small and large 'active builders' needs to be incentivised and new 'strategic players' in the housing market need to be encouraged eg 'build to rent' and public sector based housing companies. The Outer London Commission has prepared a separate report on this.
  - Housing affordability remains a key economic and social concern and is likely to require a wide spectrum of initiatives including different types of intermediate housing not just the nationally proposed emphasis on owner occupation. Adding the London dimension to national policy approaches to 'productivity', 'devolution', localism, social mix and infrastructure investment requires further thought.
  - If London is to remain a successful global and 'local' city a careful balance must be struck between the priority currently given to housing and the long term need for competitive business capacity of different sorts.
  - The current assumption that beyond the central office market areas London has a strategic surplus of office capacity needs rigorous re-evaluation. If it still holds true, the Mayor must explore the economic implications of loss of this surplus in an unplanned (PD based) way relative to the planned approach which historically was yielding some 2,000 dwellings pa while retaining affordable business capacity in competitive locations.
  - In the same vein, can it be assumed that the London economy as a whole will retain competitive advantage if it continues to lose affordable business space/industrial land at nearly three times the planned rate? Conversely, is a radical review of this benchmark required? Either way, could there be scope for relocation of some of the relatively low value added but essential functions within and beyond London, releasing more 'industrial' land in appropriate locations to provide homes for relatively high value added, service sector based workers.
  - Whilst general industrial and logistics uses face specific locational and other planning challenges, the boundaries between other types of employment such as office and light industry are becoming less distinct. The new Plan should
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be informed by a better understanding of the relationship between the two, and in particular the implications of technology on the workplace, transport connections, the built environment and locational issues.

- The Commission has already advised how retail restructuring provides scope to rejuvenate town centres (especially the medium sized ones) through higher density, housing led, mixed use redevelopment. This needs to be progressed more systematically to realise its full potential.
- More generally, how can these requirements for additional development capacity be reconciled with the need for London to become a more attractive place to live and do business, whether this is in terms of the natural environment eg air quality, or protecting its much loved cultural and built heritage? How could London's relationship with the wider region evolve in ways which are of benefit to both areas?

7 With these trends and issues (and many others) in mind, the Commission has identified a series of strategic options which it believes, in combination, will accommodate London's demographic and economic growth. In developing a strategic framework to address future growth requirements (and opportunities) the development of the new London Plan should examine what each can contribute and how they should best be combined – to the benefit both of London and its partners within the wider region. Based on the three part approach outlined above they include:

### **1. More efficient use of existing capacity, including:**

- a) Making better use of the existing housing stock:** there are 730,000 homes which currently have two or more bedrooms under-occupied. Whilst recognising that many people prefer not to move, there are others whose choice in doing so is constrained. Integrated planning, housing and social support policies can help address these constraints, for example by encouraging more specialist new housing in town centres and other accessible areas, and voluntary housing mobility schemes to enable older Londoners presently in larger houses to move on to more convenient homes nearby. Independent consultants have suggested that small scale measures such as encouraging lodgers or sharing would make better use of existing stock while helping to address the needs of some older Londoners.
  - b) Unlocking the barriers to housing delivery:** the Commission's accompanying report on barriers to housing delivery sets out 14 sets of measures which could collectively help to address the various barriers inhibiting housing delivery in London and ensure the capital is better equipped to consistently maintain the necessary levels of housing output.
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### 2. Selective, sustainable intensification within London, including:

- a) Increasing densities in town centres:** the Commission strongly supports a more proactive approach to higher density, housing led, mixed use, comprehensive redevelopment of parts of town centres already susceptible to structural change and likely to be in need of regeneration. The new homes are likely to be at significantly higher densities than their surroundings but could be attractive to some of the smaller households projected to comprise a significant part of overall household growth.
  - b) Increasing densities in areas with good public transport:** this approach would link development more closely to transport investment and emphasise the contribution of areas with higher public transport accessibility, especially inner London, to accommodating growth. Scenarios and policy could usefully be developed to assess and realise potential uplifts to development capacity associated with new major transport investment eg river crossings, Gospel Oak to Barking Line Extension, Northern Line Extension, Bakerloo Line Extension, Crossrail 1 & 2 and Overground 2 within London.
  - c) Intensification Areas, Opportunity Areas and Housing Zones:** the Commission is very aware that preparation of Development Frameworks for Opportunity Areas has already proved an important mechanism for identifying additional development capacity. Identification of new Opportunity Areas should remain a priority for the development of the new London Plan. Greater Mayoral support in working up and implementing Frameworks for Intensification Areas may enable them to realise their potential or even be taken forward as Opportunity Areas. This should be complemented by a more rigorous search for additional Intensification Areas. Housing Zones were formally recognised after the EiP of the 2015 London Plan and are currently funding delivery vehicles. These will be an important source for additional capacity in the future.
  - d) Suburban intensification:** The Commission supports the selective intensification of some suburban areas with reasonable public transport connectivity eg PTAL 3-4, through a variety of local incentives, especially in outer London. These could range from encouragement of traditional or 'upward' residential conversions through to 'block based' redevelopment focused on suburbs in need of regeneration.
  - e) Estate renewal:** combined with 'street based' development this approach has attracted considerable attention nationally. It is already an established source of capacity in London. There are challenges in bringing schemes forward, at least as a short term measure eg in terms of the impact on existing residents, the likely continuing importance of these areas in meeting the need for affordable housing and the phasing of development. The Commission believes these challenges can be overcome with careful planning, design and management.
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In developing a new London Plan, the Mayor should consider estate renewal as having particular potential to make a medium to long term contribution to meeting housing need. For the short term, the Mayor should continue to build up a more comprehensive understanding of the number of estates in London, identifying those which are practical propositions for renewal.

- f) Industrial and commercial relocation:** the Commission is concerned that London should not lose capacity for 'industrial' type functions which are essential to its wider economy. It is also mindful that views on just how much industrial land can be released without causing harm to London's economy are based on dated research. It considers that there is a need for a firmer understanding of the importance of industrial land for the London economy as a whole, particularly in relation to specific locational factors, and of its relative economic importance compared with that if used for housing. Account should also be taken of industry as a source of local employment. With this understanding it should be possible to come to a view as to whether there may be scope for some relocation of functions either within London or beyond through partnership working with the rest of the South East (see also 3c below).
- g) Co-location of housing and industry:** a range of views were put forward on the scope for co-location of housing and industry within London to provide a strategic increment to housing capacity. Whilst the Commission believes there may be some types of light industry where co-location maybe acceptable, it advises that this should be approached cautiously as the introduction of residential uses within or even on the edge of industrial areas, particularly those sites with strategic infrastructure, can compromise their distinct functions. It believes there needs to be a better understanding and distinction between the types of businesses or uses that may be appropriate for co-location.
- h) Selective release of the Green Belt within London:** the Commission has noted a number of suggestions for review/release of Green Belt land, together with broader proposals for changes in Green Belt policy. It is mindful of the range of concerns which such proposals generate, not least as an alternative to other sources of housing capacity; that change might significantly weaken protection of valued environmental assets; or that incremental review might lead to a piecemeal erosion of the Belt.

The Commission is aware that a number of Green Belt reviews have already been undertaken within and around London but not generally in a co-ordinated way. Given this, it considers that there should be a comprehensive review of the London Green Belt to assess how it addresses national policy principles in the unique circumstances of the city and in terms of London's anticipated growth. It recognises that national policy makes such reviews a local matter and it therefore suggests that the London Plan should provide a strategic methodology/principles to coordinate such local reviews on a consistent

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basis. This could take into account 'London specific' factors such as Growth Corridors, the Plan's emphasis on land use/transport integration and its distinct approaches to housing density and environmental quality.

- i) **Airports as catalysts for growth:** while this is clearly a major urbanisation issue and has significant social, economic and environmental impacts, the Mayor's position on an estuary airport and government's awaited response to the Davies review make it difficult to provide advice at this stage. Wherever a new runway is finally located, it will provide an extra incentive for integrated sub-regional planning including across the boundary. Of itself this is unlikely to yield large volumes of housing although it will impact on the economic and spatial structure of the city.

### **3. Partnership working to realise the potential of the wider metropolitan region, including:**

- a) **Growth Corridors linked to public transport within and beyond London:** having already advised on a new structure for more effective coordination of strategic policy and infrastructure investment across the Wider South East, the Commission is aware of both a series of shared issues/opportunities and of sensitivities (on all sides) about getting more closely involved. In relation to earlier versions of the London Plan this led to missed opportunities to pay more explicit attention to cross-boundary interactions, and realise the potential for collaborative initiatives to promote growth, as in the 'Corridors' identified in the current London Plan, and figuring also in the Infrastructure Plan.

The Commission welcomes the fact that more stakeholders now acknowledge the potential for mutual benefit in developing the relationship between London and parts of the wider region. This relates to the potential complementarities in business and transport provision, as well as the established housing and labour market linkages. The corridors are an important example of strategic features of significance to all parties. 'Volunteers for growth'/'willing partners' should explore how practical substance, eg through the Mayor's roles in rail franchises and fares structures, can be given to some of what have been semi-dormant ideas for 'growth'/'coordination' eg London-Stansted- Cambridge corridor; Crossrail 1 extension in north Kent and proposals for Crossrail 2, HS2, Norwich in 90/Ipswich in 60, C2C, Cambridge 4 tracking. These offer an encouraging base and example of ways forward.

The Commission recommends that, as a principle, the new London Plan should take account of the growth potential of existing and possible new Growth and Coordination Corridors within and beyond London, and seek ways of developing collaborative strategies for them.

- b) **Working with partners on the selective release of metropolitan Green**
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**Belt beyond London:** the Commission considers that the same principles should apply to review of the metropolitan Green Belt beyond London as they recommend should apply to that within London. The Mayor should provide a strategic input to this work. Given the emphasis in national policy on reviews per se being the responsibility of local authorities, the Commission suggests that the Mayor could best 'add value' by working with willing partners to develop a strategic methodology/principles to inform local reviews on a consistent basis eg to take into account strategic transport investment and new or existing growth/coordination corridors proposed through the new London Plan.

- c) Industrial and commercial relocation beyond London:** as with the potential scope for relocation of industry within London outlined in 2f, there may be potential for relocation of industry beyond London in the wider metropolitan area to free-up selected industrial land within the capital for housing. This will require a detailed understanding of the importance of industrial functions and land for the London economy as a whole and the locational factors which bear on this. Due to the potential distances involved, it will also require a clear appreciation of the business and environmental costs, particularly the transport implications.
- d) Intensification/extension to existing settlements and new settlements beyond London:** the Commission agrees with suggestions that, working with 'willing partners', consideration be given to the potential contribution of intensification/renewal in some existing towns in the wider metropolitan area which need regeneration and have good access to London; and to urban extensions or even new settlements such as those being considered in north Essex, Brentwood and Ebbsfleet. In addition, consideration could be given to including these proposals in a wider, non-statutory regional planning 'narrative', and exploring how the London Plan might support it.
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# RECOMMENDATIONS

## Other Drivers of Changes

### Recommendation 1

The Mayor should ensure that national planning policy such as that devolving from the Productivity Plan, the Housing and Planning Bill and the devolution agenda reflects and addresses the unique circumstances of London so that its broad objectives are achieved effectively here.

## Balance of housing and employment

### Recommendation 2

The Commission endorses the priority given to bringing forward good quality housing of the required type to meet London's needs but stresses that this should not be at the expense of securing sufficient capacity to develop its role as a commercially competitive and attractive world city and to meet its more local business requirements. The new London Plan will have to strike a careful, innovative and sustainable balance in reconciling provision for housing and other land uses.

### Recommendation 3

The Commission supports the thrust of established Outer London office policy to manage the release of identified surplus capacity there through the planning process without compromising its competitive commercial offer and recognises that the national approach to Permitted Development Rights (PDR) raises tensions with this.

It advises the Mayor to undertake research on how further release of office capacity will bear on the competitive offer of different types of office location and affordable business premises, and draw on this to inform both the review of the London Plan and, working with the boroughs, to make any necessary further representations to government on refining the national PD policy in light of London's distinct circumstances.

### Recommendation 4

The Commission continues to stress the need to enhance Outer London's contribution to the economy of the city as a whole. This will include improving and developing competitive business locations there eg office centres, town centres and Opportunity Areas, as well as recognising its valuable role in providing an attractive residential environment. This should not be dismissed merely as a 'dormitory' function, and it should also be recognised that new housing of itself can generate employment eg 170 new local jobs/1,000 new residents.

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## Type of employment space

### Recommendation 5

London Plan office policy should continue to distinguish between the distinct needs of the central London office markets eg CAZ, Northern Isle of Dogs and Tech City, and those of other office locations elsewhere in London, focusing viable development on Strategic Office Centres and appropriate Strategic Outer London Development Centres, Town Centres, Opportunity Areas and other types of location identified in paragraph 4.12 of the London Plan.

If additional, viable, new office capacity is required beyond central London, consideration should be given to assessing the potential for a limited number of highly connected locations to enhance Outer London's offer as a competitive business location, supported if necessary by higher density, housing led, mixed use development.

The Commission's suggested approach to national policy on Permitted Development Rights is set out in Recommendation 2.

The Commission believes that an informed London Plan requires a better understanding of the implications of technology on the workplace, transport connections, the built environment and locational issues both inside and outside London for both office and industrial uses – see Recommendation 7.

### Recommendation 6

The Commission reiterates its previous advice on town centre renewal and is not convinced that the fullest opportunity has been taken to identify and realise the scope for this suggested in its earlier proposals for higher density, housing led, mixed use redevelopment of selected town centres.

Proposed research on retail need and consumer expenditure should assess whether assumptions on the quantum, type and likely location of surplus retail space are based on fact; if they are, the policy should be pursued more vigorously. Research should also provide further evidence for the Mayor and boroughs to make representations to government to ensure that national policy on liberalisation of Permitted Development does not compromise initiatives to maximise the scope for comprehensive town centre redevelopment in the distinct circumstances of London.

### Recommendation 7

The Commission shares the Mayor's concerns over the loss of capacity for 'industrial type' activities but, as indicated in Recommendation 2, recognises that a careful balance will have to be struck in protecting that which performs important economic functions for the London economy as a whole and identifying and releasing genuinely surplus provision for other priority uses not least housing. It therefore suggests that proposed research to inform the new London Plan should investigate:

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- the functional importance of 'industrial type activities' to the London economy as a whole, including its productivity;
- the underlying drivers of demand for, and the changing needs of 'industrial type' activities, including the impact of the growth of online retail and changing demand for storage and distribution;
- the locational needs and land use requirements for different sub-sectors, including 'creative' and 'tech' industries, research and development and science which can be 'on the cusp' between office and industry in land use terms but primarily need affordable business space;
- the need to retain and protect existing industrial locations and premises in order to sustain necessary affordable business space, business clusters, industrial amenity and/or accessible hubs;
- the scope for more intensive use of existing industrial capacity
- the scope for 'co-location' eg through mixed use redevelopment/ intensification (see Recommendation 25);
- the scope for relocation of some of these activities within London, and (see Recommendation 24) beyond its borders (eg linked to the strategic road network ) and the particular implications of these moves for servicing other parts of the London economy and for traffic generation; and
- the implications of the potential loss of industrial type activities for local employment and local economies

### Business Location Factors

#### **Recommendation 8**

The Commission stresses the need for the Plan to underscore the importance of providing for a range of business premises in terms of size, type, location, cost, quality and design, recognising that new build may not bring forward some of the more affordable spaces which are necessary for economically essential but 'lower value added' support services and smaller firms, including serviced office space in view of the costs associated with redevelopment. Protection rather than redevelopment may be required to support these

#### **Recommendation 9**

The Commission endorses the principle of densification as an essential element of a strategy to accommodate growth sustainably, and considers that the London Plan's overall approach to linking higher density development, public transport accessibility and character is basically sound but, within this, recommends that aspects and application of the Sustainable Residential Quality matrix should be reviewed.

This should include exploring whether the top and bottom of the various density

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ranges in the matrix should be retained or changed; whether the settings need to be 'modernised' or extended; and whether the measures of connectivity eg PTAL should be refined or amplified eg through ATOS showing access to facilities or by taking account of network capacity (see Recommendation 11).

Consideration should also be given to attaching greater weight to the other elements of the 'Optimising Development' policy so that the density matrix is used less mechanistically/as the primary implementation tool eg by providing additional qualitative policy to guide proposals above and below the ranges: a significant number of proposals exceed the 405 dwellings per hectare (dph) maximum in the Matrix and some reach densities of 2,000 - 3,000 dph. Consideration of such proposals should be informed by a better appreciation of their bearing on quality of life, and design and density policies should be more closely integrated.

## Optimising the Benefits of Growth

### Recommendation 10

The Commission recognises that established communities can be challenged by the prospect of change and growth; that this can constrain opportunities to address their own and wider needs; and that positive community engagement in the development process can help address local concerns.

Community engagement early on in plan making and encouraging developers to engage with communities at the pre-application stage can help to empower communities when there are more likely to be genuine options for change. New technologies and techniques can help with these dialogues, lending a fresh perspective and can expand the breadth, depth and quality of engagement.

### Recommendation 11

The Commission strongly endorses the principle of providing adequate social infrastructure to secure sustainable development and growth. This can require:

- more rigorous and specific assessments of social infrastructure need which are 'owned' by the service providers as well as by the planners ;
- coordinated and timely provision of social infrastructure/services in phase with the development as a whole and integrated with those for the wider community;
- primary health care providers, and commissioners in particular, engaging more proactively in the mainstream planning of London;

In addition the Mayor should further develop the London Infrastructure Map Application to help coordinate the activities of infrastructure providers in line with growth projections set out in the London Plan.

## Land Release Issues

### Recommendation 12

The Commission believes that the London Land Commission (LCC) could and should have a crucial role to play in identifying capacity to accommodate growth. Appropriate resources and support should be put in place to ensure the LCC functions effectively to increase the supply of housing on brownfield and public sector land, including supporting the assembly of larger sites supported by an increased role for boroughs and public sector bodies in delivering housing, for example through Joint Ventures rather than disposal.

## Growth Options

### Recommendation 13

If, in the face of identified growth pressures, London is to continue to develop as a globally competitive city offering an attractive 'quality of life' to its residents and visitors, it will be necessary to elaborate and develop on the established philosophy and policies of the current London Plan.

The Commission suggests a series of options for doing this which devolve from three broad themes as set out below. Individually, none of these options represent a 'silver bullet' for accommodating London's growth, but in combination they provide the building blocks for a sustainable structure to underpin a sound Plan. Details of the options are outlined in Recommendations 14 – 31.

- 1) More efficient use of existing capacity, including:
  - a) making better use of existing housing stock
  - b) unlocking the barriers to housing delivery
- 2) Selective, sustainable intensification, including:
  - a) increasing densities in town centres
  - b) increasing densities in areas with good public transport;
  - c) Intensification Areas, Opportunity Areas and Housing Zones
  - d) suburban intensification
  - e) estate renewal
  - f) industrial relocation

- g) co-location of housing with industry
  - h) Green Belt review coordination within London
  - i) airports as a catalyst for growth
- 3) A partnership approach to realising the potential of the metropolitan region, including:
- a) Growth Corridors, linked to public transport, within and beyond London
  - b) partnership working to help coordinate selective release of the Green Belt beyond London
  - c) relocation of industrial and commercial uses beyond London
  - d) selective intensification /extension of existing, and development of new settlements and hubs with good transport connectivity to London

## Greater efficiencies in the way existing capacity is used: More effective use of the existing stock

### **Recommendation 14**

The scale of under occupation of the existing stock is such that, if sensitively managed through joint housing and planning action, it could make a strategic contribution to reducing the need for new development while addressing the needs of existing occupiers, especially some older Londoners by:

- Facilitating and providing greater choice in enabling 'downsizing' through greater choice from large houses to more convenient new homes nearby eg in redeveloped town centres;
- drawing on borough experience to extend voluntary housing mobility schemes at a London-wide or sub regional level.
- encouraging 'lodgers' and 'sharing' to increase levels of occupancy

### **Recommendation 15**

Strategic constraint on de-conversions of flats into single dwellings may make a modest contribution to reducing housing need in some areas. The Commission suggests that this be explored further and consideration be given as to whether it should be addressed in the new London Plan.

## Town Centre Intensification

### Recommendation 16

Boroughs should develop strong and realistic visions for each town centre which recognise their economic strengths and challenges, including the need to address retail restructuring and the role higher density, housing led, mixed use re-development can have in town centre renewal.

The Mayor, in partnership with boroughs, should investigate the nature and scale of renewal required in different town centres; their potential contributions to meeting housing need and, in the context of the town centre network as a whole, in providing modern services; and the most effective way of carrying this forward through the London Plan and in local plans.

### Recommendation 17

The Mayor should compile a toolkit of different delivery models for town centre regeneration and renewal, including TCIMs, to address the varied circumstances of different centres.

## Areas with Good Public Transport

### Recommendation 18

The Mayor should continue to support the principle of higher density housing in locations with good public transport connectivity, particularly around stations. Refinements to the SRQ density matrix should take particular account of the scope to realise further development potential in such locations complemented by rigorous policy to secure good quality design and adequate infrastructure. Where possible mixed use development and co-location of uses should be encouraged.

## Intensification Areas, Opportunity Areas and Hsing Zones: refining the concept

### Recommendation 19

Opportunity Areas have made a significant contribution to increasing London's housing capacity, though there have been challenges in translating some of this into completions. Joint work with the boroughs and other partners on the preparation and iterative review of Opportunity Area Planning Frameworks should be accelerated, drawing on the Commission's 'Barriers to Delivery' report; by refining infrastructure assessments as bidding mechanisms for necessary investment; and by exploring the scope to promote the opportunities presented by these areas more widely.

Preparation of the new London Plan provides scope to identify further Opportunity Areas, possibly by extension or further densification of Intensification Areas. The

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Commission also endorses the use of mechanisms such as Mayoral Development Corporations, where appropriate, to help bring forward the delivery of Opportunity Areas and realise their full potential.

**Recommendation 20**

Relative to Opportunity Areas, Intensification Areas do not appear to have made a significant contribution to increasing London's housing capacity. This may be partly because the London Plan makes their development primarily a borough responsibility.

In developing the new London Plan the Mayor is advised to consider providing greater strategic support to realise their potential. He should also draw on evidence presented to the Commission which suggests that there may be scope to increase their number – an important consideration in light of the Barriers to Delivery report which highlights the importance of increasing the overall number and range of development sites in order to accelerate housing delivery.

**Recommendation 21**

The Commission considers that Housing Zones are an important implementation mechanism in realising the potential of Opportunity and Intensification Areas, as well as of other areas. In developing the new London Plan the Mayor is advised to integrate them more closely in policy for these Areas, and, drawing on evidence presented to the Commission on other potential strategic housing locations, consider application of the Zones to these.

## Suburban intensification

**Recommendation 22**

The Commission endorses the principle of selective intensification of some suburban areas and of optimising the contribution of smaller sites in meeting housing need.

This principle is already outlined in the London Plan could be refined and progressed further. The Commission suggests that the development of the new London Plan provides an opportunity to underscore it. This will have to be done sensitively, not least by working with communities, boroughs, practitioners and developers to further explore how it can be achieved viably in differing circumstances, and without compromising local character and amenity. This in turn should provide the basis for guidance on implementation of refined policy. Priority should be given to promoting suburban intensification in areas of good public transport (PTALs 3 and 4).

The Commission also recommends that there should be greater support for small builders, who are likely to be the principal developers in these types of location. Further details are set out in the Commission's report on Barriers to Housing Delivery.

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## Estate Renewal

### Recommendation 23

The Commission endorses the national priority now attached to estate renewal to increase overall housing capacity and is mindful that it is already well established in London. There are challenges in bringing schemes forward, at least as a short term measure to address need, especially the impact on existing residents, the continuing importance of these areas to meet the need for affordable housing and the phasing of development. The Commission believes these challenges can be overcome with careful planning, design and management.

In developing the new London Plan, the Mayor is advised to consider estate renewal strategically as making a medium to long term contribution to meeting housing need. For the short term, the Mayor should continue to build up a more comprehensive understanding of the number of estates in London, identifying those which are practical propositions for renewal. The Commission believes that ensuring estate renewal continues to make a contribution to meeting the needs for affordable housing is an essential component of this strategy.

## Industrial and Commercial Relocation within London

### Recommendation 24

As indicated in Recommendation 7 the Commission shares the Mayor's concern to ensure that London has an adequate stock of affordable business space protected through the London Plan's industrial land policy while also recognising that genuinely surplus space must not be fossilised by the planning system when there are other pressing land use requirements, not least housing. It therefore advises the Mayor to explore the:

- broader economic implications of the relocation of industrial and commercial uses to other parts of London or (recommendation 30) beyond its boundaries giving special regard to additional business and environmental costs, including implications for transport movement and the capacity for such relocation;
- quantum of housing capacity which might become available in these areas as a result of the relocation of industrial and commercial uses; and
- the contributions this housing might make to London's overall output and productivity relative to that which would be made if the land remained in industrial use

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## Co-location of Housing and Industrial Uses

### Recommendation 25

The Commission would advise caution in promoting the co-location of housing and some industrial uses. This should extend to locations adjoining industrial estates. In both circumstances housing can undermine the successful functioning of nearby businesses.

## Selective Release of the Green Belt within London

### Recommendation 26

The Commission noted that independent Green Belt reviews were being promoted or considered by several boroughs. The Commission is concerned that undertaking such reviews on a piecemeal basis may not take full account of strategic considerations eg Growth Corridors and pan London environmental objectives, and may not fully optimise development outputs.

The Commission considers that it would be desirable for reviews of the London Green Belt to have a strong strategic dimension and coordination and be a matter for joint work by the Mayor and all the relevant boroughs. However, the Commission is also mindful that the NPPF makes such reviews a matter for local planning authorities.

The Commission therefore suggests that in developing a new London Plan the Mayor includes a consistent methodology/principles to coordinate and provide a strategic dimension to boroughs' local Green Belt reviews. These principles could, for example, indicate how account should be taken of London's distinct Growth and Coordination Corridors, proposed transport investment and the qualitative dimension to its environmental policies.

## Airports as catalysts for growth

### Recommendation 27

Strategic expansion of airport capacity is clearly a major urbanisation issue for London and potentially for parts of the wider city region. However, until government's response to the Davies review is known (and the Mayor's response to government), the Commission is unable to advise on how new airport capacity will bear on the geographical structures necessary to accommodate London's growth.

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## More proactive working with 'willing partners' to realise the potential of the wider metropolitan region

### Growth Corridors

#### Recommendation 28

The Commission considers that realising opportunities in Corridors within and beyond London should be part of a balanced and sustainable approach to accommodating pressures for growth which affect the wider metropolitan region as well as London itself.

This could be addressed through the new inter-regional working arrangements on which the Commission has already advised. The new arrangements are designed, inter alia, to support 'willing partnerships' to coordinate infrastructure investment, particularly public transport – both existing and new - necessary to accommodate growth and to inform the development of the new London Plan. Matters which might be considered include the disposition, character and function of the Growth and Coordination Corridors already identified in the Plan; the need for further Corridors; the need to identify any other strategic geographical features which could support the sustainable development of the wider city region; and the Mayor's role and influence in improving and extending the regional transport network eg through rail franchising and fares structures.

For the longer term, the new arrangements could provide a platform to discuss whether a broader regional 'narrative' would add value in coordinating strategic measures to accommodate pressures for growth in the most sustainable way.

## Working with partners on the selective release of the metropolitan Green Belt outside London

#### Recommendation 29

The Commission endorses the view that the Mayor should work with willing partners to explore the most effective ways of providing essential strategic inputs to Green Belt reviews beyond as well as within London. Given the strictures of the NPPF this may entail the development of a mutually useful strategic methodology/principles to help coordinate local reviews eg by taking account of Growth/Coordination Corridors and strategic infrastructure investment.

## Relocation of Industrial and Commercial uses to the Wider South East

### Recommendation 30

As indicated in Recommendation 7 the Commission shares the Mayor's concern to ensure that London has an adequate stock of affordable business, industrial and retail space managed and where necessary protected through the London Plan policy, recognising that genuinely surplus space must not be fossilised by the planning system when there are other pressing land use requirements, not least housing. It therefore advises the Mayor to explore the::

- broader economic implications of the relocation of industrial and commercial uses to other parts of London or beyond its boundaries giving special regard to additional business and environmental costs, including implications for transport movement and the capacity for such relocation;
- quantum of housing capacity which might become available in these areas as a result of the relocation of industrial and commercial uses; and
- the contributions this housing might make to London's overall output and productivity relative to that which would be made if the land remained in industrial use

## Beyond London – intensification /extension to existing settlements and development of new settlements outside of London

### Recommendation 31

The Commission recognises the potential for intensification or extension of existing settlements beyond, and with good connections to, London, especially those in need of regeneration. It also acknowledges that new, well connected, freestanding settlements can contribute to meeting local and metropolitan housing needs.

It recommends that the Mayor work with partners beyond London to consider their potential contribution as part of new or existing Growth Corridors, including securing the provision of supporting strategic infrastructure where appropriate.

