

London Plan Team  
GLA City Hall  
London  
SE1 2AA

2 March 2018

Via E-mail  
londonplan@london.gov.uk

Dear Sir/Madam,

## **Future Cities Catapult's response to the draft new London Plan (published December 2017)**

Future Cities Catapult is a technology and innovation centre partly funded by BEIS with a mission to advance urban innovation, to grow UK businesses, to make cities better. One of our thematic priorities is Advanced Urban Services and as part of advancing innovation in this sector, we've been exploring how a more data-driven and digitally-enabled planning systems could benefit citizens, developers, planners and government.

Our response to the draft new London Plan should therefore be seen in this light. We have a purposefully narrow focus, namely;

- the better use and re-use of data collected as part of the plan-making and planning application processes;
  - the development and application of digital tools to enhance efficiency, transparency and engagement; and
  - the role of the planning system in understanding and at responding to technology-driven change in the built environment.
1. Future Cities Catapult generally supports the proposals set out in the Mayor's new draft London Plan and in particular we welcome the increased emphasis on the collection, assimilation and sharing of data across London to better inform development - particularly the inclusion of BIM and 3D-related data. The importance of data as a spatial consideration cannot be underestimated - especially when it comes to future proofing the Plan for the next 20-25 years. Following on from this, the importance of cross-borough sharing, and analysis of data is critical to achieve the ambitious targets set out within the London Plan and to ensure its effective monitoring. Below are our specific areas of interest and the relevant policies which affect them:
    2. **Design and the use of data**
      - 2.1. The value and utility of data captured and processed within the planning system during the plan-making process and within planning applications is not fully exploited. Reams of useful data within planning applications, such as EIA's and 3D models are left unread and underused. The opportunity to use this data to better understand the cumulative impact of development and learn from their designs is

being missed. The problem is exacerbated when authorities commission their own data and do not store it in a standardised format or make it available externally. This makes cross-borough data analytics difficult and undermines the opportunity for a level playing field in the assessment of individual developments. In light of the above we suggest amendments to the following policies:

2.2. Policy D2 - Delivering good design, Part C (Design analysis and visualisation) states that:

*“Where appropriate, visual, environmental and movement modelling/assessments should be undertaken to analyse potential design options for an area, site or development proposal. These models, particularly 3D virtual reality and other interactive digital models, should, where possible, be used to inform and engage Londoners in the planning process.”*

2.3. We recommend this to be reworded to:

*“Where appropriate, visual, **social**, environmental and movement modelling/assessments should be undertaken to analyse potential design options for an area, site or development proposal. These models **and the data that informs them**, particularly 3D virtual reality and other interactive digital models, should, where possible, be **openly accessible so that they can** be used to inform a **city-wide understanding of developments**, and **better** engage Londoners in the planning process.”*

2.4. This change will ensure that this policy is future proofed so that the growing number of new tools and methods for assessing development are encouraged and none are excluded.

2.5. Policy D2 - Delivering good design, Part G (Design Scrutiny) - The design quality of high density developments and masterplans needs to be robustly backed by strong evidence and data to allow officers to fully understand their impact. Given the absence of a Density Matrix and the emphasis on design, we strongly recommend a new point under ‘Design Scrutiny’ setting out:

*“The design quality of proposed developments needs to be robustly assessed and quantified by the use of new digital tools, data and evidence.”*

2.6. Policy D6 - Optimising housing density removes the need for a density matrix and in the absence of a density matrix, it is even more important that policy D2, and the additional suggestion above is strongly enforced to enable decision-makers, developers and the public to understand and assess the context and impact of development options.

### 3. Technology and future impact on London

3.1. Paragraph 2.6.2 in policy SD6 - Town Centres, touches upon the need to 'adapt and diversify' in response to current and future trends, citing technological advances as

one of those key trends. It is not enough to acknowledge these future trends but to prepare strategic policy guidelines for how to handle these changes.

3.2. The emergence of digital street furniture is a specific example of how technological trends are creating new challenges and opportunities for the planning system. There is a growing demand for locating digital street furniture in the public realm. These may provide wi-fi, mobile phone-charging, advertising, and access to a growing range of services, potentially creating private and public benefits.

3.3. In granting planning permission for assets in the public realm with in-built extensible technology, it is important to consider the potential for the asset to, change its use without changing its built form. Whilst other legislation such as data protection will provide technical protection for the public, there is still the risk of increasing public concern around these assets.

3.4. Policy SI6 - Digital connectivity and infrastructure is an opportunity to add the following statement:

*“5. Local authorities should have in place guidance for digitally enabled street furniture, such as technology totems, which gives significant consideration to the services they provide and data they may collect.”*

3.5. We would also recommend that the Mayor considers commissioning research into the potential for data collected by digital street furniture to be shared with city authorities to improve the running of the city. The data could either be required statutorily or considered as ‘planning gain’. So as to protect both commercial and personal confidentiality, the data collected would in most instances be aggregated data and insights, rather than raw data.

3.6. Though we fully support the collection and use of data, it is important to set guidelines and restrictions on data capture and assimilation. The opportunity of using data can only be beneficial if we protect individuals’ rights and privacy at the same time. It is important to understand all impacts, positive and negative, of data collection methods and put in place rules that protect individuals’ so as to ensure that data is not misused.

#### 4. Viability and data benchmarks

4.1. There is difference in access to data between the major developers and their consultants, and public planners, smaller developers and the public. This is one of the causes of the ill-functioning housing and land market, which leads to the appearance that the planning system is not delivering the quantum and quality of development required to support London’s position as a leading World City. One of the biggest barriers to more transparent and consistent viability assessments is the lack of a standard format for submission of viability data. That alongside the confidential nature of viability reports means that there is not enough data to generate robust benchmarking figures to support planners when evaluating assessments. In light of the above we would recommend amendments to the following policies:

- 4.2. Policy GG4 - Delivering the homes that Londoners need, part E states that those involved in planning and development must:

*“Establish ambitious and achievable build-out rates at the planning stage, incentivising build-out milestones to help ensure that homes are built quickly and to reduce the likelihood of permissions being sought to sell land on at a higher value.”*

- 4.3. Though we fully support the policy, we suggest the addition of a requirement to standardise the method and data which is collected and make viability more open through the use of benchmarks to allow for this policy to be implementable. It is vital for the collection and sharing of data to be established early on in the process so that it can make these targets achievable.
- 4.4. We strongly support the inclusion of standardised and accessible viability information to be submitted as part of the Viability Tested Routes for planning applications as detailed in Policy H6 - Threshold approach to applications - Part E. It is essential to create a detailed standard for this data, particularly for those variables that are critical in determining viability, such as land price, expected sales values, etc. Viability assessments can and usually are updated during the viability process as new and updated data becomes available or as the development proposal is developed more in detail. In order to keep the data accurate as possible, viability assessments should have their dates made public.
- 4.5. Policy DF1 - Delivery of the Plan and Planning Obligations, part D sets out priorities in planning obligations should a site not be able to be seen as viable. In that respect we believe a more integrated approach to viability assessments which allows officers to compare the impact of multiple applications that ‘do not meet the threshold’ or cannot deliver all planning obligations due to viability is needed.
- 4.6. If these could be compared across a singular platform we’d have a better understanding of development impact. Paragraph 11.11.1 reiterates how the assessment of viability on a site-by-site basis has undermined the deliverability of plan objectives and increased land value. We agree and support change to policy to require all viability data to be shared - this would not compromise the confidentiality of the data if it were to be stored in one place, used to create benchmarks, and where different users have different levels of access to this data.

## 5. Using data to monitor targets

- 5.1. The monitoring of housing, planning obligations, retail/commercial impact floor space, etc. could be made more robust and transparent if a standardised format was created for this data. This would allow it to be processed automatically, to avoid human error and be significantly more resource efficient.
- 5.2. In light of the above we recommend that Policy H1 - Monitoring Housing targets and Policy M1- Monitoring provide robust methodologies of data collection from the earliest stage of planning applications and to be monitored throughout until completion. We would also fully support the addition of data standardisation as a requirement for monitoring to make cross-departmental sharing easier within the Local Authorities as well as making it simpler for cross-borough sharing of housing figures.

5.3. The targets set out in within the London Plan could benefit from a standardised data set that keeps a robust count of housing numbers permitted on each site, the amount that are built out and the rate at which they have been built. A standardised data set such as this should also be open and shared across boroughs as this could help achieve a clearer picture and an accurate view of housing targets for London as a whole.

## 6. Conclusion

6.1. Recent trends show that the Government now understands that digital transformation is part of the solution. The Housing White Paper devoted a section to “Digital planning: making plans and proposals more accessible” and the draft economic strategy for London has a whole chapter dedicated to technology and its use. It is important for the digital and data agenda to be consistent through local and national policies as it is one of the most important trends transforming our spatial environment.

If you require any further information or wish to discuss any of the issues we have raised in further detail, please do not hesitate to contact us.

Yours Sincerely,

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On behalf of;

**Future Cities Catapult**

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