

# A City for all Londoners – consultation response

## London Assembly Planning Committee

### Background

Following the publication of ‘**A City for all Londoners**’ the London Assembly Planning Committee held a meeting with the Deputy Mayors for Planning, Regeneration and Skills and Housing and Residential Development, to inform the Committee’s response to the consultation.<sup>1</sup>

‘A City for all Londoners’ builds on the Mayor’s election manifesto and outlines London’s challenges and opportunities across a range of policy areas that the Mayor wants to deliver on, over the next four years.

As with all previous versions of the London Plan, this one will have to manage record levels growth sustainably, ensuring all the elements needed to maintain London’s status as a competitive city offering a good quality of life are delivered. This task is becoming ever more challenging as brownfield sites become ever more complex to develop and the opportunities to locate homes, jobs and supporting infrastructure, more scarce.

Overall, the Committee welcomes the document and is supportive of the intention to:

- Accommodate as much growth as possible within London’s boundaries;
- Adopt a new focus on ensuring growth is ‘good’ and neighbourhoods are inclusive;
- Place a priority on supporting higher densities with supporting infrastructure; and
- Prioritising the need for affordable housing.

The Committee does have concerns that detail and emphasis appears to be lacking in relation to:

- Renewed and updated policy on climate change mitigation and adaptation;
- Discussion on issues such as water, energy, waste and drainage; and
- Measures to address inequalities as set out in the GLA Act to address cross-cutting themes.

The Committee, and Assembly as a whole, looks forward to contributing to the process of detailed policy development over the coming year in the lead up to a full public consultation version of a reviewed London Plan.

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<sup>1</sup> The transcript of the Planning Committee on 15 November  
<https://www.london.gov.uk/moderngov/documents/s60569/clean%20GLA%20-%20Planning%20Committee%2015-11-16.pdf>

## **A lack of policy detail**

The Committee recognises that this document represents the first step of a major revision of the London Plan, as well as a suite of statutory strategies that will also be reviewed in 2017.

The document represents the current state of the Mayor's thinking at a very high level, and lays the ground for the policy review process that will commence in the coming year. **As such there are few detailed policy proposals contained within the document for the Committee to comment on. However, we set out our major areas of concern below.**

## **Compact city, increasing density and maintaining sustainable growth**

The compact-city approach has been a feature of all London Plans since 2000. This approach requires high-density, mixed-use, mixed-income developments to be located near well connected transport nodes and town centres to improve access to jobs and services, while reducing reliance on private cars. Large numbers of people can sustain schools, local shops and other facilities in a way that a more dispersed community cannot. London's established network of well-connected town centres is well suited to this approach.

The Committee is supportive of a continued emphasis on the compact city approach but would wish to see the Mayor address some of the growing challenges in a revised London Plan policy these include:

- New ways of increasing density will be central to a revised London Plan. Higher density can deliver the homes needed but sustainability must not be jeopardised. There are challenges, particularly in Inner London. New homes require a full range of supporting infrastructure. In areas where available land is at a premium (including sites in Outer London), increased housing targets are putting pressure on boroughs to make stark choices in prioritising infrastructure and other land uses where sites are limited.
- Housing density will need to increase in appropriate locations if the Mayor's 50,000 housing aspiration is to be met. 'A City for all Londoners' suggests there will be a review of housing plans in the Mayor's two Development Corporations. The Committee would welcome a similar reappraisal of each of the Opportunity Areas to examine infrastructure requirements and opportunities so that works can be effectively coordinated, planned and prioritised. It is essential that the Mayor and infrastructure providers plan for the longer term, providing a clear view of infrastructure commitments and plans to ensure development is sustainable.
- Intensification Areas receive little mention in the document. These are particularly important in terms of suburban development and boroughs will require greater support from the Mayor to develop these sustainably and particular consideration needs to be taken in terms of the infrastructure priorities for these areas.

- The Committee has long supported the idea of overseeing a managed intensification of London's suburbs. The Mayor now has the opportunity to set out in the revised London Plan policy through which this can be achieved. The Committee would wish to see the version of the Plan that is published for public consultation contain new and detailed policy through which such intensification can be realised.
- The Mayor's approach to Outer London needs to be made clear in the London Plan. If suburban London is going to contribute to more of London's new housing it needs to be complemented by improvements in sustainable transport. The Mayor's proposals for inclusive neighbourhoods are particularly relevant for Outer London neighbourhoods and town centres (see comments below for details).
- Working with boroughs, housing providers, the utilities and SMEs will be key to delivering the Mayor's aspirations. Too often this is an 'afterthought' and omitted from policy development in such strategic planning documents. Cross-working is vital and thought should be given in the forthcoming London Plan about how policy can be translated into delivery.
- The Mayor needs to push hard on getting the infrastructure needed to support new homes in London's Opportunity Areas. More innovative thinking is required to bring forward funding proposals speedily, as in Vauxhall as opposed to the example of Barking Riverside, where development has been delayed because the necessary transport infrastructure has not been forthcoming.
- The Committee welcomes the Mayor's statement that "with growth of this scale, it is important that current residents feel comfortable with local changes and that new developments are desirable places to be. I will therefore develop the city according to the principles of 'good growth'." This suggests a welcome willingness on the Mayor's part to balance the need for density with the provision of land for the infrastructure needed to support the 'good growth' that was explained by the Deputy Mayors at the November Planning Committee.
- Co-ordinating growth and infrastructure provision will be vital if the Mayor's goal of 'good growth' is to be met. The Committee is aware of a number of responses to this consultation that also reflect this concern, for example that from the Institution of Civil Engineers. The Committee would support this widely held view that the London Plan and Infrastructure Plan are closely integrated. The magnitude of growth and its location will be an important factor in understanding the scale and nature of the required infrastructure needed to support development.
- Inclusive neighbourhoods should be the basis for delivering greater access to the day-to-day services and a vehicle for combating social exclusion. The Committee supports the Mayor's intention to promote 'inclusive neighbourhoods' and would wish to see this approach build on the existing Plan's policy of 'lifetime neighbourhoods' which is a good concept that needs developing. Inclusive neighbourhood policy should support all the elements needed for accessible, sustainable and resilient neighbourhoods that

contain the full range of social infrastructure within walking distance. There may also be scope for strengthening policies designed to support local facilities and services, such as Policy 4.8, as there are suggestions that valued community assets like pubs require further protection through policy.

- Attention must also be paid to the importance of encouraging a high quality public realm, particularly when major development gives the opportunity for improvement. Equally, the London Plan must ensure that adequate community infrastructure is required to support sustainable communities.
- Balancing the need for new homes with access to open space will be a real challenge, as densities in London will have to surpass those that exist in many comparable European capitals. Recent work by the Assembly's Environment Committee points to the need for strong standards in relation to access to sufficient open space in terms of space per person. The Committee would wish to see the consultation version of the London Plan set out such detail.
- In meeting the challenge of building new homes for London, the protection and promotion of natural habitats is not always given the highest priority. While the London Plan contains policy for protecting natural 'biodiversity' and enhancing green infrastructure, the Housing Committee is undertaking a review to look at how new guidance could be adapted to further promote biodiversity in London including ways of ensuring new housing development results in a "net gain" of biodiversity. The Committee will be publishing a report with recommendations on how the new London Plan can promote and enhance biodiversity in new housing developments in early 2017 and would wish to see the Mayor take up some of the findings in new policy.
- Similarly, other recent work by the Housing Committee has raised the importance of ensuring new homes meet the need of Londoners. Measuring new housing in terms of units will be insufficient and the Assembly would wish to see the consultation version of the Plan discuss different ways of meeting Londoners' housing needs in terms of size of units and bedspaces.
- If well designed, new homes can be suitable for some Londoners despite being below accepted space standards. The Committee recognises there is a difficult balance to be struck in ensuring new homes can be affordable for first-time buyers while offering sufficient space standards. New homes that fall below minimum standards should only be permitted in line with policy that specifies the highest design standards.
- The Committee would recommend the Plan deals with the contribution that off-site manufactured housing can make to London's new housing supply. The Committee will be publishing a report with recommendations on how the new London Plan can encourage such housing in early 2017 and would wish to see the Mayor take up some of the findings in new policy.
- The Committee welcomes suggestions that the Mayor is reviewing the London Plan's sustainable residential quality matrix. An assessment should be made of the need to

include capacity for supporting infrastructure alongside the current factors of transport accessibility and urban character, if future growth is to be 'good'.

- London's supply of brownfield land is, in one sense, limited by issues of accessibility and economic viability, although its scale approaches a borough the size of Camden. New approaches, such as rethinking the phasing of transport infrastructure, co-ordinating attempts to identify surplus land, or making heavily contaminated sites economically viable, may be needed to maximise the supply of brownfield and in particular those that face particular challenges for development.

## **Balancing the need for housing, employment and supporting infrastructure**

London's unique property market makes the protection of employment uses from conversion to housing vitally important. The Mayor must continue to promote a strategic approach to permitted development and should lobby Government vigorously (in conjunction with other partners) to allow London to adopt an approach that is different from national policy.

A balance between maintaining employment and increasing housing density must be struck in the new London Plan. 'A City for all Londoners' addresses the challenge of finding enough land for housing while protecting land used for employment across the city. It highlights that some areas of London have 'surplus industrial land' that could be better used for housing. "It may be possible to relocate industry to other areas of the city without disrupting the economy or eroding the critical base of industrial land. It may be feasible for housing and industrial activity to co-exist in certain locations."

While the current London Plan adopts an approach of 'managed release of industrial land', there are indications that the loss of industrial land is running ahead of the rate anticipated. The latest London Plan Annual Monitoring Report (July 2016) notes "The rate of loss of industrial land is significantly higher than in the previous two years and is more than 2.5 times above its monitoring benchmark" and the Deputy Mayor of Planning, Regeneration and Skills pointed out that the equivalent loss in Central and East London is far greater still.

- The Committee welcomes the Mayor's review of Industrial Land Demand and recommends the new London Plan contains policy recognising the importance of retaining a supply that not only reflects existing demand, but policy that recognises the importance of future demand.
- When engaging in long-term forecasting and planning there are challenges to assuming that current trends will continue unchanged and that existing methods of production will continue. The London Plan must consider how emerging technologies and industries might make demands on land. The Committee's response to the Infrastructure Plan highlighted it is vitally important to think about future industrial developments. We recommend that the Mayor takes soundings from the Smart London Board and appropriate sections of academia in reviewing land use requirements of emerging industry.

- ‘A City for all Londoners’ suggests a shift towards more proactively considering the co-location of housing and industrial activity through revised mixed-use policy. The Committee understands the Mayor’s reasoning in terms of optimising land use, however any shift in policy must be carefully considered. Retail and residential uses are easier to co-locate, but light-industrial, logistics and residential will require strict policies to ensure the residential quality is adequate and employment uses are not jeopardised.
- Protecting vital industrial land, and uses such as wharves, needs to be prioritised. The Committee suggests the Mayor apply his ‘Agent of Change’ approach to such strategically important employment land uses, as well as some consideration of how to manage the consequences of co-locating housing and employment.
- The Plan’s original policies on tall buildings were not designed to apply to residential towers, and the new Plan needs to approach policy on this issue differently. The Committee notes the Mayor’s view that tall buildings can be part of a future in London if they add to the urban character and are well designed, and it welcomes the Mayor’s willingness to consider a different approach to increasing density by using different housing configurations.
- Tall buildings have more embodied energy and use fewer renewable materials; the taller the building, the less likely it is that we can use low-carbon timber, and the higher the embodied energy per usable square metre. They also use additional energy-hungry lifts; are more exposed to wind and sun, leading to higher heat gains and losses for the same amount of insulation; cost more per square metre to build maintain and repair. In order to achieve zero carbon or Level 5 of the Code for sustainable homes, tall towers may have to be designed more imaginatively in the future and the Mayor may wish to consider how this can be achieved through planning policy.
- Tall buildings are not the answer to London’s real housing needs, and as such should not be encouraged through policy outside a few and designated and carefully manage areas. The Committee would also wish to see the next London Plan adopting a well-conceived scrutiny process of tall buildings at the design and planning deliberation stages.
- The Committee would welcome further policy detail in relation to tall buildings in the next consultation version of the London Plan and recommends the Mayor review the content of a letter from the Committee to the previous Mayor dated 9 March 2015<sup>2</sup>, which contained six recommendations for the management of tall buildings through the London Plan and other Mayoral planning powers.

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<sup>2</sup> [https://www.london.gov.uk/sites/default/files/gla\\_migrate\\_files\\_destination/15-03-09-final-tall-buildings-letter.pdf](https://www.london.gov.uk/sites/default/files/gla_migrate_files_destination/15-03-09-final-tall-buildings-letter.pdf)

## **Joint Infrastructure Investment Corridors and Protecting the Green Belt**

The Mayor has stated his intention to accommodate “as much growth as possible” within London’s boundaries, leaving open the possibility that some growth may be directed outside London to the South East of England. This appears to be a slight shift in policy which will require better co-operation with authorities outside London than has hitherto existed.

Furthermore, the suggestion that housing and transport investment will be more closely integrated, may allow regional schemes such as HS2, Crossrail 1 and 2 to facilitate growth outside the city. The approach looks to be developed through ‘joint infrastructure investment corridors’ that stretch out beyond London’s borders. “This will require close collaboration with neighbouring authorities in the Wider South East.”

- The Committee has previously suggested to the Mayor that dialogue with the rest of the South East is vital if London's growth can be accommodated and to do so will require establishing effective regional co-operation on new housing. Directing London's growth away from its current boundaries would require some kind of joint strategic plan on a regional level covering London as well as the Home Counties. As this is likely to run counter to Government policy the Mayor will have to build a robust case and convince sceptical authorities outside of London.
- The Committee notes, and strongly supports, the Mayor’s commitment to protecting the Green Belt. Many of the existing and planned regional transport schemes are radial and pass through the Green Belt. The Committee would not wish to see the integrity of the Green Belt jeopardised by development alongside the routes in unsuitable locations.
- The next version of the London Plan should also restate the Mayor’s commitment to protecting Metropolitan Open Land as well as recognising the role that can be played by other open spaces, including privately owned spaces, in contributing to a healthier city, a more sustainable city and assisting in climate change mitigation.
- The Committee, in general, would wish to see the Mayor make a stronger case for policies on climate change. The time for urgent climate action is now. The Paris Agreement represents a historic step in tackling climate change; it is a huge challenge but also a great opportunity. Action on climate change has a wide range of benefits for the health and prosperity of this city and our citizens; from green jobs and growth, to cleaner air and energy, all have an immediate and tangible impact on our lives. By tackling these issues cities can avoid false trade-offs and drive urban development that reduces greenhouse emissions and climate risk while increasing the health and wellbeing of our citizens.
- Such policies, focussing on the challenge of climate change will also assist to make London a more resilient city. The Committee expects the next version of the London Plan to be specific on policies such as the circular economy and would hope to see a decreasing emphasis on energy from waste from incineration, as this is incompatible with a future based on reuse and resource efficiency, the secondary materials economy

and materials innovation. The next Plan should contain more developed thinking on policy addressing the need for recycling, re-use and re-assembly.

- A City for all Londoners is light on the detail of the Mayor's proposals to address the challenges of water supply and drainage. The Committee's response to the draft Infrastructure Plan, in October 2014, highlighted concerns that the Mayor needs to seriously consider the role of Sustainable Urban Drainage – which barely features in Thames Water's business plans – and this is an issue that needs to be addressed in the next London Plan.

### **City Hall, ensuring the resources and skills are available to deliver**

Translating policy into delivery will require sufficient staff with the right skills to meet the aspirations contained within 'A City for all Londoners'. The Committee is therefore concerned that the GLA is yet to gear itself up to meet the scale of the challenge, for example the number of posts in sections responsible for delivering TfL's property development programme is too light in relation to the scale of the task.

- The Committee welcomes the Mayor's skills and capacity audit that is being carried out by Deloitte and looks forward to being able to discuss the findings and implications for the GLA for delivering the Mayor's programmes in the near future.

### **The need for regular communication of policy development process**

2017 will see a spike in the number of consultations on new policy and strategy and, in terms of scrutiny of the Mayor's policy development, will form a significant focus of this Committee's work. Members are cognisant of the fact that all timings given for publication of Mayoral consultations are provisional, and are liable to slippage. This provides a challenge to organising the Committee's work programme, especially in relation to scrutinising the Mayor's planning policy proposals.

- The Committee, therefore, welcomes the assurance given by the Deputy Mayor for Planning, Regeneration and Skills to provide the Chairman of the Planning Committee with a regular update on the timetable for the publication of these documents to enable positive and effective engagement with the policy development process.

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21 December 2016