



9 December 2016

## **A City for All Londoners**

### **A submission by the Town and Country Planning Association**

#### **1. About the TCPA**

Founded in 1899, the Town and Country Planning Association (TCPA) is the UK's oldest independent charity focused on planning and housing. The TCPA puts social justice and the environment at the heart of policy debate and seeks to inspire Government, industry and campaigners to take a fresh perspective on major issues, including planning policy, housing, regeneration and climate change. Our objectives are to:

- Secure a decent, well designed home for everyone, in a human-scale environment combining the best features of town and country;
- Empower people and communities to influence decisions that affect them;
- Improve the planning system in accordance with the principles of sustainable development

#### **2. Introduction**

The TCPA welcomes the opportunity to comment on the Mayor of London's vision 'A City for all Londoners'. This response has been prepared as part of the TCPA Policy Council working group on London and the South East. Please see Annex 1 for membership of this working group. The TCPA has also published a special edition of the *Town & Country Planning* in August 2016 on "Strategic Planning in the London Metropolitan Region" as background to this submission.

The TCPA has made submissions to previous reviews of the London Plan and been represented at London Plan Examinations in Public. Several TCPA members have been pleased to attend some of the early engagement sessions and round table discussions, and we commend the Mayor for this openness.

We welcome this document as an initial statement by the Mayor as to his vision for London's future. While recognising that this document is intended to present an overview for all Mayoral strategies, we are also conscious that it will set the framework for the review of the London Plan, the statutory Spatial Development Strategy for London. We therefore wish to use this opportunity to set out the TCPA's priorities for such a review.

#### **3. TCPA response to specific chapters**

##### **Part 1 Accommodating Growth**

The TCPA supports the growth of London, the appropriate intensification of development around key station hubs in London and the maximisation of use of

underused land in some parts of the city. However, we also believe it is vital that the Mayor works with partners beyond London in achieving sustainable growth, including consideration of opportunities to create new and expanded sustainable settlements in the wider south east region.

As stated in its contributions to previous London Plan reviews including submissions to Examinations in Public, the TCPA considers it essential that the Mayor reviews development options within the context of the relationship to the metropolitan region travel to work area. We welcome the initiatives taken by the Mayor to continue with collaboration on strategic planning with the local planning authorities in the wider South East, though these are perhaps underplayed in the document.

We recommend the Mayor to continue the work undertaken by the GLA and Transport for London and to continue to support the legacy of the Outer London Commission's recommendations about the potential for residential and employment growth in transport based growth corridors extending beyond the existing administrative boundary of London. We are concerned at the implication contained within the document that London will still seek to meet the challenges of London's growing population within its own boundary.

We endorse the view made by the Inspector at the last London Plan Examination in Public that the densification of residential development, which is the consequence of this 'compact city' approach, can have negative social impacts. This approach can increase the market demand for the limited available developable land, including for public facilities, and thus cause higher land prices and will result in higher cost of housing, and a general inflationary process. An alternative 'Growth Corridors' approach could avoid these risks. If well planned, it would provide an opportunity to affirm the Green Belt to meet its original purposes – maintaining the character of separate towns, and making a natural environment available for recreation.

We therefore recommend a comprehensive review of all sets of potential development options undertaken in collaboration with local planning authorities in the Wider South East is completed. A strategic overview of this process would be beneficial with the aim of creating good quality well located development at scale, rather than dispersed, with associated review and upgrade in the quality of and access to the Green Belt.

It would be useful if the Mayor was to set out explicit criteria for assessing development options against economic, environmental, and social sustainability objectives. We would also suggest that the Mayor should undertake a comprehensive assessment of possible scenarios in relation to both residential and economic growth, in the light of Brexit and other external factors, including the availability of both public investment and international and domestic private investment, given different scenarios impact on both the scale of growth and on its spatial distribution. This should include consideration of London's role in relation to the rest of the country.

## Part 2 Housing

The TCPA welcomes the fact that the document recognises the significant undersupply of new housing and that to this end the Mayor has commissioned a new Strategic Housing Market Assessment and a Strategic Land Availability Assessment. We welcome the Mayor's commitment to reverse the recent increase in rough sleeping and to work with the London boroughs to both reduce homelessness and to more effectively manage the placement of homeless households in temporary accommodation.

We are however concerned that the Mayor may not as yet fully recognise the extent of unmet housing need as well as new need arising from the current high rate of population and household growth, given the current housing requirement estimate of 49,000 homes a year is based firstly on a lower population projection and on an assumption that the backlog of housing need should be met over a 20-year timescale rather than the 10 years previously assumed. The TCPA highlights recent research on housing need by Neil McDonald and Christine Whitehead in November 2015 titled *"New estimates of housing requirements in England, 2012 to 2037"* which suggests a breakdown of housing need including for London.

The Mayor should review the extent to which the current residential development pipeline is appropriate to meet the needs of London residents, given the extent to which the development programme is dependent more on the needs of investors rather than the needs of potential occupants. The Mayor has recognised that the proportion of new homes which are genuinely affordable by lower and middle income residents is grossly inadequate and we welcome the Mayor's initial intention to increase the affordable housing target to 50%. But the TCPA is disappointed with the recent draft Affordable Housing and Viability SPG setting a threshold at 35%. The TCPA also recommends the Mayor retain existing commitments to Lifetime Neighbourhoods.

The Mayor however should seek to ensure that the majority of new sub-market housing is affordable by lower income households and review the options for re-introducing income related definitions of affordability both into the London Plan and into his housing investment programme. We welcome the proposals for a London Living Rent. However, rent levels for a significant proportion of new development need to be related not just to average household incomes, but also the incomes of households on less than average incomes.

The Mayor should also review the form of homes built, both in terms of built form and in terms of the mix of new homes in terms of family sized homes (3 bedrooms and larger) relative to 1 and 2 bedroom homes for single and other smaller households. London's recent development programme has been largely smaller homes and this is not appropriate for meeting the needs of family sized households. The Mayor needs to review the extent to which the built form of recent development, with an increasing proportion of high rise developments, is the most appropriate to meet London's residential requirements.

We are aware that the Mayor is currently reviewing the existing London Plan density policy and its application. While we recognise that some higher density development may contribute to meeting some components of housing demand in London, and that while we support some low level incremental suburban residential intensification, we are concerned that some forms of densification, including the development of schemes at hyper density, breach the fundamental principles of Sustainable Residential Quality on which the London Plan is based, and reduce the quality of life and wellbeing not just for residents in such schemes but also for residents within the neighbourhoods concerned.

### **Part 3 Economy**

The TCPA welcomes the Mayors commitment to protecting the Central Activity Zone (CAZ) along with the spatial distribution of business outlets across London.

London's recent economic growth has been largely dependent on London's financial services and the professional services which relate to it. There has also been significant growth in the creative, media and tech businesses as well as the significant hospitality and service industries that support London and underpin London's cultural offer and the significant growth in tourism.

London's economic growth has remained centred on the Central Activities Zone and Canary Wharf, both of which continue to expand. Recent growth in creative, tech and media related employment has focussed on the CAZ the city fringe and increasingly further out to the outer London Boroughs. While London's economy recovered quickly from the global financial crisis of 2008, in contrast with many of the UK's other urban centres, the impact of Brexit on the London economy and specifically on employment related to London's current global financial services role remains unpredictable.

While it is unrealistic to assume a reversal of the long-term downward trend in employment related to production, the TCPA recognises the growth of new makers and producers inspired by the history and traditions of industry in London and with different locational requirements. It is clear that the case for protection of employment land and a more polycentric approach to the location of employment in London remains strong. A greater spatial balance between homes and jobs will reduce the need for commuting, thus reducing both the need for transport investment, congestion and the negative environmental and social consequences which arises from increased and lengthier commuting. It would be useful for the Mayor to set out explicit criteria for assessing development options against economic, environmental, and social sustainability objectives.

We are concerned about the trend of increasing residential values to crowd out business uses and we would support the enhanced commitment of the Mayor to the protection of Strategic Industrial Land and to support individual Borough's to protect locally designated employment land including through Article 4 Directions where appropriate.

The TCPA welcomes the Mayor's commitment to planned infrastructure to support growth. We recommend the Mayor to work through the TfL and with key partners to set out how the infrastructure will actually be delivered, to what timescale and with clarity over who and how contributions will be expected to be paid. We note the anticipated amendments to CIL legislation which should assist with CIL policy for London at both mayoral and individual Borough level.

Research shows that town centres are particularly important as a source of local employment. London could learn from other European cities in the way transport investment is used to link up outer suburbs, and to promote and fund comprehensive development in key areas. The best opportunities are likely to lie around railway stations owned by Network Rail that lie adjacent to canals and former industrial land.

The TCPA also supports the enhancement to the broadband and wider telecommunications infrastructure for London since this will support the extension and growth of business activity further across London.

#### **Part 4 Environment, Transport and Public Space**

In line with the TCPA's core principles to achieve sustainable development, we have adopted a very clear approach to environmental responsibility and to reducing and building resilience to the impact of climate change on future communities.

We welcome the Mayor's approach to the environmental objectives. In a recent report by the TCPA and JRF on *"Planning for the climate challenge? Understanding the performance of English local plans"* which found under-delivery of climate change obligations by Local Planning Authorities. But it did highlight the importance of the London Plan in setting out strong climate change policies.

The TCPA would be pleased to work with the GLA to develop these policies and activities for London that not only enhance the overall quality of life in the City but also enhance social equity through better health, better greenspace, and better places for people to live, work and enjoy. We particularly welcome the Mayor's strong commitment and early initiatives to improve London's air quality as one of the key routes to improving health for Londoners and especially those with predisposition to shorter life expectancy.

With regard to transport, the TCPA note that London's residential development strategy has been linked explicitly to the consideration of public transport access and continued investment in public transport is necessary to support appropriate residential growth. We welcome the Mayor's intention to promote a further shift in transport modes to more environmentally and economically sustainable modes. And promoting walking and cycling will have an important role for shorter distance trips. But further demands for orbital movement can also be anticipated in Outer London if growth is to be accommodated in town centres and through selective intensification. This will require more significant interventions in addition to the welcome proposals for proposed Thames Crossings in East London.

We also suggest that all development proposals incorporate individual sustainable travel plans and that in areas of low public transport accessibility that growth is only supported once enhanced public transport is planned and programmed for delivery. The Mayor might also wish to consider infrastructure capacity and need in assessing different transport projects. This should include small-scale as well as strategic projects under alternatives scenarios. For example reusing closed or under-used lines could transform opportunities for people on lower incomes to reach local jobs and services without adding to congestion on the roads.

We welcome the Mayor's commitment to creating great places that are well designed, respecting the heritage of the past, promoting new and innovative solutions to urban densification and vision for London as an inclusive modern city. The Mayor has also demonstrated a commitment to increasing London's arts, cultural and creative industries offer. It is important that this recognises and celebrates the diverse communities of London.

### **Part 5 A City for All Londoners**

The TCPA is committed to empowering people and local communities and we welcome the ambition that London needs to be a 'city for all Londoners'. We welcome the principles of 'good growth' and 'healthy streets' which should be considered under a broader approach to ensuring 'healthy places'. We also consider that the document does not adequately recognise that there may be conflicts between the continued promotion of London's world city role and ensuring social and spatial equity within London and that there must be special measures to achieve good.

As the Mayor has acknowledged, it is important that the gains from London's economic success are more widely shared. We are concerned that as the London economy has boomed, and as housing costs have inflated, London has become a more unequal city and a more polarised city. This trend must be reversed. The TCPA has recently published important research and undertaken local engagement on healthy planning and health inequalities, recently in relation to the role of planning in helping to tackle the obesity crisis. In March 2016 the TCPA, Public Health England and the LGA published "*Building the Foundations: tackling obesity through planning and development*". In this regard the TCPA would strongly support London Plan policies which uses planning powers proportionate to ensure genuine step change improvement to Londoners' physical activity opportunities and access to healthier food environments.

In addition, the TCPA's work has focused on ensuring the planning process facilitates a more inclusive society. The TCPA would strongly welcome greater collaboration with the GLA to look in more detail at this work and how it could be used to support the London Plan review evidence base and policies. We are keen to embed positive planning responses to see sustainable growth including access to employment and skills, business support, community ownership and sustainable construction that not only reduces the every day living costs and contributes to climate change mitigation

but also embeds equity for the long term. Through the TCPA's New Communities Group (NCG) of local authorities bringing forward significant housing growth we have developed models and response to growth that could be replicated in housing zones and other growth areas in London.

The Mayor's powers, in plan-making, in relation to individual development proposals, and in the measures the City can take to support delivery are central to achieving good sustainable and healthy growth in London. It should also be recognised that much of London's population is transient, including a significant proportion who are not transient by choice, but due to lack of security in their homes or their employment. Planning must have as a core objective the protection of such households and an enhancement of their quality of life through support to access training and employment and through the measure to improve the physical built and natural environments.

#### **Additional points re monitoring the London Plan.**

In addition to the general points raised above, the TCPA would also wish to make two key points in relation to the process and content for the review of the London Plan:

The Mayor should review the extent to which targets set in successive London Plans since 2004 have been met, in terms of the Performance Indicators set. Much of this information is available from the London Plan Annual Monitoring Reports but needs to be subject to an overview and fuller analysis.

The Mayor needs to be explicit as to updating of targets in the light of new research and assessment of London's development requirements. It is important to be explicit as to whether targets are based on historic trends or are intended to represent a new objective or policy shift.

#### **4. Conclusion**

The TCPA has welcomed the opportunity to comment on the Mayor's Vision a City for Londoners and we would be pleased to work with the GLA to share our expertise and recent experience in taking forward London's growth strategies. We would expect the development of the Plan for London and the related regeneration work to closely align to the TCPAs ambitions for good growth. We look forward to the opportunity to contribute to further stages of the London Plan review.

#### **Annex 1: Members of the TCPA London and South East working group**

- Sandra Fryer
- Duncan Bowie
- Nicholas Falk
- David Farnsworth
- Dalia Lichfield
- Corinne Swain
- David Waterhouse