

The Mayor's draft replacement London Plan
Consultation response from the London Assembly

January 2010



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1. Introduction

1.1 The London Plan is a statutory strategy under S.41 of the GLA Act 1999.

1.2 On 29 April 2009 the Mayor launched his formal review of the existing London Plan when he published his Initial Proposals for consultation with the London Assembly and GLA Group. At its meeting on 9 June 2009 the Committee discussed these Initial Proposals with Sir Simon Milton, Deputy Mayor and Chief of Staff, (Deputy Mayor for planning, housing and sustainable development).

Assembly comments on previous drafts of the London Plan

1.3 On 14 July 2009 the Committee responded to the Mayor's initial proposals and these are attached as Appendix A to add context to this set of comments. The Mayor published his response to the Committee's comments on 12 October 2009. The comments made in July 2009 focussed on some of the high level strategic issues that underpin the Plan's basic assumptions and a number of policy proposals that have been examined so far during the Committee's work. At that stage it was the intention of the Committee to reflect the strategic issues in the Initial Proposals document leaving its more specific comments on the detailed policies in subsequent versions of the draft replacement Plan. Therefore both sets of comments should be read in conjunction.

1.4 The Committee's response to the Mayor's initial proposals in July 2009 set out its view on the strategic issues that underpin the basic assumptions used by the Mayor in the London Plan. As well as commenting on the proposals in each main topic heading the Committee made specific points in relation to:

- The Mayor's approach, vision and objectives – specifically the greater detail required in the draft Plan in order to demonstrate how his vision will be delivered and how his expectations for the future development of London can be translated into local decisions by boroughs.
- The Mayor's choices and contingencies – specifically that the Mayor must take into account climate change, growing inequality, and the threats to London's economy that reliance on banking and finance services have shown. The Committee was concerned that the Mayor should demonstrate that he has taken into account the latest evidence to underpin his assumptions on economic growth and the challenges to the environment.

- 1.5 The Mayor published his draft replacement London Plan, along with his draft Transport and Economic Development Strategies for public comment on 12 October. The consultation period closed on 12 January 2010.
- 1.6 On 2 December 2009 the Committee held a further meeting with Sir Simon Milton to discuss the public consultation draft of the replacement London Plan and to use the resulting discussion to inform these comments. Additionally the meeting sought to identify issues that the Committee would want to highlight for any possible future involvement in the London Plan Examination in Public process that is expected in summer/autumn 2010.
- 1.7 The Committee's comments are set out below under each of the main chapter headings of the draft replacement London Plan. The comments in this response address the high level strategic assumptions (which are also addressed in the Appendix) and the more detailed level of individual policies. Comments on specific policies relate in particular, but not exclusively, to the Committee's work over the previous 18 months – for example on housing, Outer London, urban agriculture, war memorials and small shops.

Overview

- 1.8 The Committee notes that the Mayor's vision and objectives for London provide a degree of continuity in terms of endorsing the existing Plan's emphasis on managing London's economic and demographic growth; protecting and enhancing London's world city role; addressing climate change and environmental quality. **This continuity is appropriate for a strategic plan that shapes the long-term development of London.**

Strategy co-ordination

- 1.9 The Mayor is reviewing three key and inter-related strategies simultaneously - the London Plan, Transport and Economic Development Strategies. This co-ordinated review process is one that the Assembly has called for since the GLA was set up and so the Committee welcomes the Mayor's decision as it contributes significantly to ensuring strategic consistency and integration.
- 1.10 The Committee notes however that two further key strategies are further behind in terms of development: the Mayor's Climate Change Adaptation Strategy is to be issued for public consultation in January and the Mayor's Climate Change Mitigation and Energy Strategy is to be released in draft

for consultation with the Assembly and functional bodies in January 2010. The Committee further notes that the Municipal Waste Strategy is due to be published on the 18 January 2010, therefore the Committee has not been able to be assess them against this Plan.

- 1.11 It is likely that the Assembly's Environment Committee will be formally responding to these strategies in February and March 2010.
- 1.12 These documents will have significant implications for the London Plan policies contained in the chapter on London's response to climate change. This does not give the Assembly the same opportunity to understand the climate change section of the London Plan and evaluate the policies against the Mayor's strategic objectives. **The Committee expects that when the Climate Change Adaptation and Mitigation and Energy Strategies have been assessed fully the Assembly will have the opportunity to submit comments to the Examination in Public.**

Policy coverage

- 1.13 In keeping with the Mayor's intention to make the new Plan shorter, easier to read and more strategic the number of policies has been reduced. There now are some 122 policies (compared with 201 in the current version) and the supporting text has similarly been reduced.
- 1.14 There were initial fears that, from the reduction in policies, it might be assumed that there are now policy gaps. However the Committee's analysis shows that, in the most part, policy areas addressed in the current Plan have equivalent policies in the Mayor's draft replacement London Plan. However many of the new policy proposals are broader in coverage compared to more specific policies that deal with individual issues in the existing Plan.
- 1.15 **The Committee expects that the public consultation process and subsequent Examination in Public will identify those areas of policy detail that require further debate and refinement. The Committee looks forward to the Examination in Public discussion that will be needed to resolve any potential issues in the proposed replacement London Plan.**

New policy areas

- 1.16 The Committee welcomes the inclusion in the Mayor's proposals of some specific new policies that are not detailed in the existing Plan e.g. small

shops (Policy 4.9), Inner London (Policy 2.9), Community Infrastructure Levy (Policy 8.3) as well as more detailed policies for Outer London (Policies 2.6 – 2.8).

- 1.17 The Mayor's proposals also include four new Opportunity Areas (Charlton, Earl's Court, Kensal Canalside and Southall) and two new Areas for Intensification (Dalston and Harrow & Wealdstone).
- 1.18 **The Committee is pleased to note that the Mayor has also sought to take into account some of the Committee's recommendations and on-going work by including references to food growing (Draft Policy 7.22), local food growing and distribution (Draft policy 2.18) and war memorials (Draft Policy 7.8). Further reference to these draft policies is made in the relevant sections below.**

Policy omissions

- 1.19 A small number of policy areas appear to have been omitted (or are not immediately evident) in the Mayor's current proposals. These include references to special needs and specialist housing (Policy 3A.13 in the existing Plan), new safety provision on the Blue Ribbon Network (existing Policy 4C.15), social and economic impact assessments (existing Policy 3A.28) or supporting neighbourhood plans (existing Policy 3A.29).
- 1.20 **For sake of clarity the Mayor should explain these omissions or point to a specific policy reference in his proposals.**

Implementation and monitoring

- 1.21 It is a statutory requirement to produce an Annual Monitoring Report on the implementation of the London Plan, which is based around measurable performance indicators. This provides a valuable opportunity to test how the Plan is working in practice, and as such it should be ensured that monitoring is carried out in the most effective way possible.
- 1.22 The Committee understands the Mayor's desire to minimise the number of targets in his Plan, however the Committee is concerned that performance indicators used in the Plan are sufficient in scope and number to enable third parties to sufficiently understand how the Plan is being implemented. The Committee's further comments on this issue are set out in section 8 of this response.

2. London's places

2.1 This chapter details special policies for areas of London facing particular needs or with distinctive parts to play in its development up to 2031. The Committee's comments reflect the particular areas on which it has focussed its work during 2009 – specifically the challenges faced by Outer London, its town centres and potential for local jobs growth.

Outer London development centres

2.2 A long standing Assembly criticism of the current London Plan is that it is excessively focussed on promoting employment growth in Central London, leaving Outer London to serve the role of a dormitory to workers who must travel to jobs in the centre¹.

2.3 **Therefore the Committee welcomes the fact that the Mayor's proposals contain significant new policies addressing issues affecting Outer London including its economy and transport requirements (Policies 2.6 –2.8).**

2.4 The Committee also welcomes the Plan's broader approach, set out in Policy 2.16, that identifies a number of strategic Outer London development centres that are locations with specialist strengths which potentially or already function above the sub-regional level and generate growth significantly above the long term outer London trend.

2.5 Policy 2.14 (Areas for regeneration) would benefit by the addition of text to reflect the location of activities associated with addressing climate change should be encouraged in regeneration areas and Combined Cooling Heat and Power (CCHP) systems serving the area itself and surrounding areas promoted.

2.6 Policy 2.15 (Town Centres) town centres as concentrations of activities at higher densities are vital locations for CCHP systems if London is to meet the carbon reduction targets. This together with the extension of centre CCHP systems to surround original areas needs to be modelled in Policy 2.15 "A" and added to paragraph 2.63.

2.7 Policy 2.16 (Strategic Outer London Development Centres) There is no mention of activities related to addressing climate change in the policy or in the role of strategic functions of greater than sub-regional significance.

2.8 Policy 2.17 (Strategic Industrial Locations) The reference to the climate change sector in Policy 2.17 "B (c)" as a new and emerging industrial

sector could be strengthened because Strategic Industrial Locations are one of the main locations the climate change sector can locate to.

- 2.9 Section 5 of this response deals with the specific proposals to tackle climate change and identifies the need for the Mayor's response to climate change to inform policies throughout the Plan. Policies therefore need to have a spatial dimension and the Heat Density Map 5.1 referred to in Policy 5.5 should be linked to spatial priority areas, for example Opportunity Areas and the Areas of Intensification. These are shown on Map 2.4. The Committee believes this is an example of how a low carbon policy could be applied spatially to locations where there is an intensification of development. The Committee suggests that Policy 5.5 should also be reflected in Policies 2.13 - 2.17.

Knowledge based employment

- 2.10 Policy 2.7 (Outer London: economy) touches on ways of overcoming constraints on the economic growth of Outer London. The supporting text notes that a strategic approach to office provision is needed, however the Committee believes the Mayor is missing an opportunity to provide direction and emphasis to the potential of knowledge based sectors and the growth that could be supported through the supply of information and communications technology.
- 2.11 As employment uses become increasingly compatible with residential environments, there will be growing opportunities for local employment activities, including home-working and live/work spaces.
- 2.12 **The Mayor should set out in his London Plan, more strongly, what support the planning system could give to boroughs to promote new ways of working, including exploiting information and communications technology, in a way that makes suburban areas and town centres more appropriate places to work from.**

The Olympic and Paralympic Games

- 2.13 Policy 2.4 addresses the 2012 Games and their legacy. The 2012 Olympic and Paralympic Games, their infrastructure and investment, have created the most important strategic regeneration opportunities in London for the next 25 years. Successful, viable and sustainable regeneration of the Olympic Park and its surrounding areas is the Mayor's highest regeneration priority and offers a unique opportunity to secure and accelerate the

delivery of many elements of his strategies and lessen inequality across London.

- 2.14 The Committee notes that the Mayor is preparing Olympic Legacy Strategic Planning Guidance with the planning authorities of the host boroughs, the London Thames Gateway Development Corporation and the Olympic Delivery Authority.
- 2.15 **While the Committee understands the opportunities that the Olympic International Broadcast Centre and Main Press Centre provide in terms of the strong technological infrastructure legacy for the media and creative industries it urges the Mayor to ensure that future guidance provides equal encouragement for future businesses in all sectors to locate and develop in the Olympic Park and surrounding areas.**

Inner London

- 2.16 Policy 2.9 (Inner London) sets out the Mayor's proposals for this part of London and the Committee notes that this is the first time the Plan has recognised that there are characteristics that are distinctive about this part of London. The Committee also notes assurances from the Deputy Mayor and the London Plan Team that policies exist throughout the Plan that relate to Inner London. However, there is a concern that there may be a disparity in detail – compared with the inclusion of new policies for Outer London.
- 2.17 The Committee would like to see further guidance in relation to Inner London borough LDF preparation contained in Policy 2.9 and also better cross-referencing with the Transport Strategy and other specific Inner London infrastructure improvements.
- 2.18 **In terms of wider aspects of the Olympic Legacy the London Plan should specifically mention the opportunities to apply Policy 5.2 (achieving the 55 per cent or zero carbon standards sooner than the London-wide targets), 5.3 (in particular maximising reuse of materials and infrastructure), 5.6 (establishing a heat and cooling network, possible integrated with the Thames Gateway network), 5.7 (maximising renewable energy generation) and 5.8 (pushing innovative technologies being proposed such as syngas) on the site.**

3. London's people

- 3.1 This section sets out the challenges of accommodating economic and population growth sustainably; principally how to deliver more high quality homes for Londoners that meet a range of needs along with supporting social infrastructure provision such as health, education and sports facilities. Overall there is an aim to promote genuinely sustainable neighbourhoods.

Housing

- 3.2 In responding to the consultation on his draft housing strategy² the Committee was unable to agree on a common position in relation to the Mayor's removal of the 50 per cent affordable housing target and the change to the 60/40 social/intermediate split. This is covered in the existing London Plan by Policy 3A.9 (Affordable housing targets) and amended by the proposed Policy 3.12 (Affordable housing targets).

Increasing housing supply

- 3.3 **The Committee welcomes the increased target of 33,400 additional homes signalled in Policy 3.3 (Increasing housing supply) from the existing minimum target of 30,500 (existing Policy 3A.1).** The Plan points to the report of the London Strategic Housing Land Availability Study/Housing Capacity Study to demonstrate how the London Plan housing provision target of 33,400 has been tested against the National Housing and Planning Advisory Unit supply range, leading to the provision targets in Table 3.1.

Meeting demand

- 3.4 The 2008 London Strategic Housing Market Assessment, published in April 2009, provides estimates of the requirements for additional housing in London over the next ten years, broken down by the tenure and the size of homes required. **The estimates for future housing demand form an important part of the evidence base for the Mayor's London Housing Strategy and London Plan.**
- 3.5 The Strategic Housing Market Assessment estimates the requirement for social rented housing to be between 35 and 45 percent. The London Plan appears to set a target for social rented housing at 24 per cent of new housing. The Committee agrees with the Mayor's statement that "people live in units not percentages" but in terms of affordable housing (Policy 3.12) the average of 13,200 more affordable homes each year compares with a need of some 18,000. This is broken down to the average of 7,920 social rented homes each year compared to a need of some 14,560, whilst

an average of 5,280 intermediate homes are projected each year compared to a need of only 3,6403.

3.6 The Committee understands that the Mayor's housing target should also "reflect an assessment of the likely economic viability of land for housing within the area, taking account of risks to delivery and drawing on informed assessments of the likely levels of finance available for affordable housing, including public subsidy, and the level of developer contributions"⁴.

3.7 The Mayor has been frank that, given the economic circumstances, he does not believe it is possible to specify a higher affordable housing target that would not threaten the viability of schemes overall.

3.8 The Committee understands that the housing strategy and associated funding programme covers a different, and shorter, timescale to the London Plan and therefore it is valid to recognise the implication of agreed funding for short term housing targets. However, the London Plan is designed to shape the longer term future of London. The Mayor should be mindful of this and reflect in the London Plan his long term objectives and aspirations for housing particularly in terms of the requirement.

3.9 The Mayor's statement of his housing priorities includes the intention to reduce the impact of a shortage of affordable housing:

*"Overcrowding has increased in all tenures between the 1991 and 2001 censuses. The greatest increase was in the social rented sector, which now has the highest level of overcrowding of any tenure. The Mayor is firmly committed to tackling this growing and serious problem and has set a new target to halve severe overcrowding in social housing by 2016. This will be achieved by increasing the supply of affordable homes, in particular family sized affordable homes; by better use of existing social rented stock; and by expanding the Seaside and Country Homes Scheme."*⁵

3.10 The Mayor has set out his intention to address the existing backlog in housing need over ten years (paragraph 3.14). While the overall annual housing provision target of 33,400 additional homes over ten years would help to reduce this backlog the Committee would welcome further detail on how the quantified need for affordable homes will be met.

3.11 **The Mayor's intention to address the existing backlog and future demand for housing does not seem to accord with the proposed policy in terms of anticipated social rented homes built. The Plan should be clearer that the need for affordable housing is**

considerably greater than the Mayor is planning to deliver based on current condition of the housing market. The minimum housing units that the Plan envisages is about half of what the need is projected to be.

- 3.12 The Mayor should ensure that the key targets from Housing Strategy are referred to in the Plan. Additionally the Plan should set out the timetable for the publication of the Housing SPG, and provide clarity around what level of guidance will be provided to boroughs through the Plan, and what will be left to SPG.
- 3.13 The annual housing target is of at least 33,400 additional homes across London. The supporting text should refer to it as a net target as it does in the previous London Plan so that there is not confusion with investment targets which are gross.
- 3.14 **Policy 3.4 Optimising housing potential no longer seeks to maximise housing on sites but rather optimise density according to the specific conditions of individual sites. The Committee notes the inter-relationship between this policy and Policy 7.4 (Local character). The Committee supports both these policies and notes the need for careful monitoring of their implementation to achieve the desired outcomes.**

Quality and design of housing developments

- 3.15 In the Committee's comments on the Mayor's initial proposals it supported the Mayor's intention that the new London Plan should strongly promote high quality urban environments contributing to a high and improving quality of life.
- 3.16 **In its response to the Mayor's housing strategy the Committee said it is important that the Mayor's commitment to improving space standards across all tenures is made explicit in the future revision of the London Plan and that a Mayoral commitment to minimum space standards needs to be signalled urgently.**
- 3.17 **The Committee strongly welcomes the Mayor's commitment to ensuring that housing developments should be of the highest quality (Policy 3.5). In particular the Committee welcomes the minimum space standards set out in Table 3.3. It will be important that the Mayor's future housing SPG sets out clear guidance to**

boroughs on how to achieve these improvements in housing quality.

3.18 To support both the Committee's and Mayor's commitments to improving space standards across all tenures the Committee suggests the Mayor would want to consider an addition to Table 3.3 to include minimum space standards for bedsit/single person dwellings with minimum space standards of around 45 square metres. This is supported by the RIBA response to the London Housing Design Guide consultation in September 2009.

3.19 The time is right for a consistent set of minimum space standards across all housing sectors (social, intermediate and private) and taking the opportunity to include new standards will:

- Promote the consistency, fluidity and flexibility that people need to move between different housing sectors;
- Give time to prepare developers in the housing industry for a new set of standards when the market gets moving again;
- Provide a level playing field between the developers of affordable and market housing.

3.20 In relation to his Housing Strategy the Committee urged the Mayor to require all new housing should be built to higher space standards and that the Mayor should also work towards improving space standards in the private sector to establish a 'level playing-field' across tenures and to tackle the identified poor space standards that have characterised new homes in London⁶.

3.21 Any moves to reduce the standards set out in Table 3.3, or even abandon them, should be strongly resisted. Notwithstanding the implications for space standards, any removal of the requirement for the private sector to meet minimum standards would impact on the relative viability of schemes built with public subsidy and further affect the provision of affordable housing as recognised in paragraph 3.6 above (on targets relative to need).

Open space provision

- 3.22 **The Committee supports the elements of Policy 3.5 that relate to the protection and provision of open space in housing developments.**
- 3.23 **The Committee welcomes Policy 3.6 (Children and young people's play and informal recreation facilities) and feels that the Mayor's intentions would be strengthened if section "B" (Planning decisions) includes the 10 m² of play and informal recreation space per child that is set out in the existing SPG (Providing for Children and Young People's Play and Informal Recreation, March 20087).**
- 3.24 **The existing London Plan promotes pan-London housing mobility (Policy 3A.12 Partnership approach and Sub-Regional Implementation Frameworks). The Committee is unable to readily identify which of the Mayor's current proposals deal with this issue and suggests the Mayor clarify how the issue of pan-housing mobility will be dealt with in the capital.**
- 3.25 **The Committee shares the Mayor's concern that there should be no segregation of London's population by housing tenure (paragraph 3.52) and supports the general aim of Policy 3.10 (Mixed and balanced communities).**

Back gardens

- 3.26 **The Committee welcomes the Mayor's commitment to support the elements of Policy 3.5 that relate to a presumption against development in back gardens and to support the protection, promotion and enhancement of London's open space generally and in particular in Outer London where it contributes to local character and maintaining the high quality of life.**

4. London's economy

- 4.1 The policies in this chapter are designed to support development and growth of London's diverse economy over the years to 2031. It complements the Mayor's draft Economic Development Strategy and deals with the needs of different sectors of the economy and their workspace requirements. It also offers a policy base for innovation, with support for new and emerging economic sectors and a "connected" economy.
- 4.2 The Assembly's Economic Development, Culture, Sport and Tourism Committee have led on this area in commenting on the development of the Mayor's strategy for London's economic development. The Planning and Housing Committee broadly supports the Mayor's economic development policies that are expressed through his London Plan proposals and has a number of comments on particular policy areas that have featured in the Committee's work during 2009. These are set out below.
- 4.3 In its July 2009 response the Committee strongly supported the Mayor's intention that the Plan should provide a planning basis for managing growth and economic development of all parts of London. It especially welcomed the recognition that London's economy needs to diversify away from a reliance on financial services to one that provides support for sectors such as the universities, medical services and research, science, the creative and cultural industries⁸.
- 4.4 The Committee draws to the Mayor's attention the concerns raised by experts on the implications of recent economic, employment and climate change projections⁹ and the need to consider the latest evidence to underpin his assumptions on economic growth and the challenges to the environment. This evidence must justify his proposals.
- 4.5 Policy 4.1 (Developing London's economy) The Committee welcomes "Policy 4.1 A (b)" that the Mayor and partners will drive London's transition to a low carbon economy. However, this and paragraph 4.6 should start by referring to the Mayor's carbon reduction target, which gives an indication of the scale of the challenge, how it must permeate all sectors of the London economy and will be a major source of future employment

Small shops

- 4.6 The Mayor has signalled his intention to help protect London's high streets by securing affordable retail units for small shops through section 106 contributions.

4.7 Policy 4.9 (Small shops) and the Plan's supporting text sets out how, when considering proposals for large retail developments (typically over 2,500 m²), the Mayor will, and boroughs are encouraged to, seek contributions via section 106 planning obligations where appropriate, feasible and viable, to support the provision of affordable shop units suitable for small or independent retailers and secure their availability over time.

4.8 **The Committee supports this policy but believes there is more that the planning system could, and should, do in addition to providing affordable shop space.**

4.9 Additional and complementary measures might include:

- Recognition of the impact of existing national planning policy and potential changes to the planning system that could help to protect small shops;
- Wider support through the London Plan in relation to its goal of supporting "lifetime neighbourhoods", where access to public transport, basic amenities, local shops, and green and open spaces are within easy reach of homes;
- The potential for London boroughs to actively adopt measures to protect small shops through the planning system and wider local authority powers.

4.10 There are relevant policies contained elsewhere in the Plan that offer support for small shops, for example:

- There are aspects of local diversity and choice are contained in Policy 7.1 (Building London's neighbourhoods and communities) and supporting text that introduces the concept of "lifetime neighbourhoods", where access to public transport, basic amenities, local shops, and green and open spaces are within easy reach of homes. The Plan says that the Mayor will assist boroughs and other agencies in developing "lifetime neighbourhoods" by providing advice and guidance in updated supplementary guidance.
- In Policy 2.15 (Town Centres) there is the proposal for boroughs, in coordination with neighbouring authorities, identify other, smaller centres to provide convenient access, especially by foot, to goods and services needed on a day to day basis, develop their role as foci for local

neighbourhoods, and relate these centres to the network as a whole to achieve its broader objectives.

- 4.11 **The Mayor may wish to give further consideration as to how these policies and others can be integrated and emphasised to provide boroughs with more explicit support for the further protection of their small shops.**
- 4.12 **The Committee intends to publish the findings and recommendations of its review into small shops in March and would hope that the Mayor will give the Assembly the opportunity to take into account any potential amendments to small shops policy and present its arguments during the London Plan Examination in Public.**
- 4.13 **Policy 4.9 (Small shops) It is important, in the context of "A" that small affordable shop units are affordable. This should be in the policy and not just mentioned in paragraph 4.49. London Boroughs should develop local policies to support provision of small shop units. Small units need discounted rents and independent retailers could be supported through S106 Agreements.**

New and emerging economic sectors - Green Enterprise District

- 4.14 The Committee welcomes the recognition that London's economy needs to diversify away from a reliance on financial services to one that provides support for sectors such as the universities, medical services and research, science, the creative, cultural and green industries. Policy 4.10 recognises the fact that new economic sectors will emerge and grow in importance between now and 2031.
- 4.15 Again, this policy should refer to the Mayor's carbon reduction target, which gives an indication of the scale of the challenge, how it must permeate all sectors of the London economy and how new and emerging economic sectors will be a major source of future employment.
- 4.16 Tackling the effects of climate change through new development and retrofitting the stock of existing buildings produces an opportunity for new jobs in the "green business sector", with opportunities in renewable energy, waste reduction and recycling.

- 4.17 The Mayor is promoting a “Green Enterprise District” in the Thames Gateway stretching from the Lower Lea to London Riverside, a concept that “could be extended to other parts of London”.
- 4.18 **It is essential that the Mayor ensure that policies in his Economic Development Strategy are supported by policies in the London Plan. Given the tremendous potential of “green jobs” and the role they could play in diversifying London’s economy the Plan should show support for boroughs to provide adequate space across London for jobs in low carbon industries such as renewable energy, waste reuse and recycling, and local retrofitting. Further guidance or direction could be given as to the likely space and site requirements boroughs may need to accommodate these kinds of jobs.**

5. London's response to climate change

- 5.1 The Mayor is seeking to tackle climate change by reducing London's carbon dioxide emissions, managing resources more effectively and adapting to the effects of a changing climate. Particular policies in the Plan cover energy efficient buildings, more decentralised energy networks and an increase in renewables.
- 5.2 Both the existing Plan and the proposed Plan aim for a long-term reduction of carbon dioxide emissions by 60 per cent (against a 1990 base) by 2050. The existing Plan seeks a minimum reduction of 30 per cent by 2025 (Policy 4A.2) whereas the Mayor's current proposal seeks to achieve the full 60 per cent reduction by 2025 (Policy 5.1). **The Committee strongly supports this Policy commitment.**
- 5.3 For the past few years climate change has risen up the political agenda. The inclusion of the target to cut CO₂ emissions by 60 per cent by 2025 from 1990 levels (Policy 5.1) is welcome but this response to climate change needs to inform policies throughout the Plan. The policy on climate change should not be treated in isolation from the other aspects of the Plan so the Plan needs to demonstrate true integration – for example retrofitting should be cross referenced in housing and transport should refer to the need to change behaviour patterns to achieve carbon reduction to give but two examples¹⁰.
- 5.4 Since the previous Plan Parliament has passed the Climate Change Act 2009 and London as a region needs to contribute to the implementation of the Government's low carbon budget plan. There may be a need to consider whether London's overall contribution to climate change is in line with the low carbon budget.
- 5.5 The Plan states that overall, the most substantial emissions savings London can make will come from initiatives to decarbonise its energy supply and to reduce the emissions from the existing building stock.
- 5.6 In addition, the Mayor expects that all new development will fully contribute towards the reduction of carbon dioxide emissions, and this will be principally achieved through the application of Policy 5.2 (which sets minimum improvements over the Target Emission Rate leading to zero carbon residential buildings by 2016 and non-domestic buildings by 2019) and the Mayor's energy hierarchy. Again, the Committee strongly supports this Policy.

- 5.7 **The Committee also offers strong support for policies 5.5 (decentralised energy networks), 5.6 (decentralised energy in development proposals), 5.7 (renewable energy) and the new and improved policies 5.8 (innovative energy technologies) and 5.9 (overheating and cooling).**

Carbon dioxide reduction

- 5.8 Under the Greater London Authority Act 2007, the Mayor has a statutory duty to contribute towards the mitigation of and adaptation to climate change in the UK.
- 5.9 **Overall, while welcoming Policy 5.1, the Committee would like to see more details in the Climate Change Mitigation and Energy Strategy regarding what share of reduction of carbon dioxide is expected from each sector which then inform this policy in the London Plan. The Committee expects that when the Climate Change Mitigation and Energy Strategy has been assessed fully the Assembly will have the opportunity to submit comments to the Examination in Public.**

Retrofitting

- 5.10 London's existing domestic buildings contribute 38 per cent of the region's carbon dioxide emissions alone. Along with other non-domestic buildings, retrofitting the existing building stock presents a significant opportunity to help meet the strategic carbon dioxide reduction target of 60 per cent by 2025.
- 5.11 **The Committee welcomes Policy 5.4, which concerns retrofitting, but would like to see better integration with the Climate Change Mitigation and Energy Strategy, which we expect will quantify the scale and likely carbon dioxide emissions reductions to be found from retrofitting. The Government's Zero Carbon definition will make retrofitting a material consideration for planning applications. Boroughs should be required to carry across any targets and standards from the Climate Change Mitigation and Energy Strategy to their LDFs. Boroughs should also be required to assess the land requirements associated with retrofitting, including temporary materials yards, workshops and associated industries, to ensure that development controls are used to support this policy.**

Sources of carbon dioxide reduction

- 5.12 **Local planning authorities will be unable to properly assess the contribution of a proposed development to this target without more detail. By analogy, if the current level of detail on climate change mitigation were applied to housing policies, they would simply state that net 835,000 homes should be built in London during the period of the London Plan, without any further detail as to distribution, tenure mix, special needs, and so on. It would then be difficult to put the housing contribution of a proposed development in proper context. Where policies are expected to contribute towards the Climate Change Mitigation and Energy Strategy, the scale or relative importance of this contribution should be stated.**
- 5.13 **The Committee suggests that boroughs should determine the likely economic development, housing and community facility supply, and transport patterns that will be compatible with the Climate Change Mitigation and Energy Strategy, and then assess a planning application in light of these requirements and the relative contribution of different London Plan policies.**

Waste

- 5.14 PPS10 (Planning for Sustainable Waste Management) requires the Mayor through the London Plan to identify the tonnages of municipal solid waste and commercial/industrial waste to be managed and to apportion them by waste planning authority area.
- 5.15 The Committee notes that on 7 December 2009 the Mayor launched an eight-week public consultation on a Minor Alteration to the draft Replacement London Plan. This deals, in the main, with borough-level waste arisings and apportionments.
- 5.16 The closing date for the consultation period is 1 February and the Committee will be considering how to respond to the Mayor's proposals in consultation with other relevant Assembly Committees. **The Committee expects that when these proposals have been assessed fully, particularly in relation to the number of small sites and any proposals for the loss of sites, the Assembly will have the opportunity to submit comments to the Examination in Public.**

5.17 The Committee has initial concerns that the lack of clear policy and the loss of self sufficiency target make an analysis of the waste policy difficult without a proper analysis of the Waste Strategy (see paragraph 1.10 above).

6. Transport

- 6.1 Planning and transport are inextricably linked. The Committee agrees with the Mayor who recognises that transport plays a fundamental role in addressing the whole range of his spatial planning, environmental, economic and social policy priorities. It is critical to the efficient functioning and quality of life of London and its inhabitants¹¹.
- 6.2 The main source of policy on transport is the Mayor's Transport Strategy and the Committee directs the Mayor to the Assembly's Transport Committee response to the Transport Strategy for key comments.
- 6.3 Transport issues will be primarily tackled in the Mayor's Transport Strategy, which is being prepared in parallel to the London Plan. However, the London Plan will need to ensure a coordination of land use and transport planning and the provision of infrastructure and services.
- 6.4 Key London Plan aspects are tackled by policies on integrating transport and land use, advocating development in areas with current or planned high levels of transport need, encouraging boroughs to provide land for transport infrastructure, and the phasing of development to ensure that the transport network can cope with additional traffic.
- 6.5 **Overall the Committee supports the continued intention to integrate transport and land use and so the Plan will need to identify where planned growth in jobs and population will require work to be done to anticipate improvements needed in the public transport system to sustainably cope with development.**
- 6.6 Where growth takes place in Outer London, support for new and improved transport schemes will be required to co-ordinate the economic development and transport policies.
- 6.7 The Committee's comments on the Mayor's initial proposals in relation to the longer-term integration of transport and development remain relevant. The Mayor has taken the decision to remove proposed, but unfunded, transport schemes from the TfL Business Plan due to lack of available funding after 2017.
- 6.8 The uncertainty of funding is reflected in the TfL Business Plan that saw the end to a number of unfunded outline proposals (Thames Gateway Bridge, Oxford Street Tram/Transit, East London Transit and Greenwich Waterfront Transit, Cross River Tram, Croydon Tramlink extension to Crystal Palace).

- 6.9 The Committee understands the Mayor's rationale as it applies to the shorter term Transport Strategy, however the London Plan is intended to deal with a far longer time period than other strategies such as housing, economic development and transport.
- 6.10 **Therefore, mindful of the role of transport in accommodating sustainable growth, the Committee would encourage the Mayor to indicate where new transport schemes may be needed to underpin development in the longer term¹² subject to changing circumstances.**
- 6.11 **The Committee notes that Policy 6.11 (smoothing traffic flow and tackling congestion) removes the traffic reduction targets and modal shift emphasis from the existing Plan (policy 3C.17).**
- 6.12 **Policy 6.12 (road network capacity) may have an impact on traffic reduction and modal shift by easing the controls on new road building, shifting to the requirement to show only a net benefit.**

Outer London transport

- 6.13 Outer London town centres need to act as radial transport hubs so that commuters can travel in and out from the surrounding suburbs. However, to support sustainable economic development the Mayor must also encourage greater investment in Outer London transport improvements, particularly orbital links wherever this is financially possible.
- 6.14 The Outer London Commission considered the case for a self-contained, high-speed orbital public transport system linking particular centres. It concluded that this would be unlikely to address outer London's needs. Instead, it recommended a 'hub and spoke' approach, with transport networks focussing on town centres. The Mayor agrees with this approach, which is adopted in his Plan proposals.
- 6.15 Policy 6.3 (Parking) sets out parking standards to balance promoting new development and preventing excessive car parking provision that can undermine cycling, walking and public transport use.
- 6.16 **However the Plan suggests Outer London boroughs would be permitted to promote a more generous standard of parking for office developments in order to create jobs in London and fulfil outer London growth policies.**

6.17 This policy logically follows the Outer London Commission's findings that there may be a case for selective review of some aspects of parking policy in particular to rejuvenate the outer London office sector. The Commission noted there should be a much stronger commitment to introducing a level playing field with Outer Metropolitan Area on parking policy and out-of-centre development.

6.18 The Committee notes the Mayor is seeking to balance a desire to reduce need to travel, especially by car, using maximum car parking standards in Policy 6.13 and table 6.1 with promoting new development and also encouraging Outer London office development by relaxing parking standards.

6.19 However, this balance needs to be carefully managed if the objectives of reviving the Outer London economy are not to compromise his strategic transport objectives contained in Policy 6.1.

6.20 **The Committee believes that the Mayor could consider the potential of other policy levers to achieve the same objective in a different ways.**

6.21 He should work with regional, sub-regional and local authorities and agencies in the East and South East of England to secure the sustainable development and management of growth in the wider metropolitan area and the greater South East of England and coordinate approaches to other strategic issues of common concern (Policy 2.2 – London and the wider metropolitan area).

6.22 **This could be an alternative way of to introducing a level playing field with Outer Metropolitan Area on parking policy and out-of-centre development.**

7. London's living places and spaces

- 7.1 This chapter focuses on a broad range of policy areas that impact directly on how people perceive and use the places they live in, work in and visit. The quality and function of neighbourhoods and places, access, heritage, local character, landscapes, inclusive design, safety, security and resilience, green infrastructure, biodiversity, air quality, soundscapes and the Blue Ribbon Network all contribute towards making London a special place and improve quality of life.

Lifetime neighbourhoods

- 7.2 **Policy 7.1 (Building London's neighbourhoods and communities) is a welcome statement of the Mayor's commitment to the objective of securing diverse, strong and secure communities.**
- 7.3 **The Committee strongly supports the concept of Lifetime neighbourhoods, where access to public transport, basic amenities, local shops and green and open spaces are within easy reach of homes and are consciously planned into proposals at the outset.**
- 7.4 **The Committee looks forward to being able to contribute to the concept of 'lifetime neighbourhoods' through the updated supplementary guidance signalled by the Plan.**

War memorials

- 7.5 **The Committee strongly supports the Mayor's inclusion of references to war memorials in Policy 7.8 that now, following the Committee's review into London's war memorials (recommendation 3), are given specific mention as heritage assets that should be identified, preserved and restored.**
- 7.6 **For clarity the Committee would like the Mayor to confirm that, in his understanding, Policy 7.8 covers the recommendations that:**
- **The specific issue of war memorials should be one that is covered within borough Local Development Frameworks and Development Plan Documents during their preparation, monitoring and review (Committee recommendation 2) in Policy 7.8 F/G; and,**
 - **The Mayor must ensure that the identification, protection and preservation of war memorials affected by any strategic planning application that is referred to him is one of the matters**

considered by officers as relevant to built heritage policies (Committee recommendation 4) in Policy 7.8 C/D.

Food growing

- 7.7 **The Committee fully supports the Mayor's 2008 commitment to increasing protection for green space and growing space in the London Plan¹³.** Now the Plan is being reviewed there is the opportunity to assess how the planning system can better support food growing in and around London. The Committee has published a report that addresses this issue¹⁴.
- 7.8 The Mayor, in his current draft London Plan, has made a good start in proposing to provide specific support for land for food growing and the Mayor's proposals already include more detailed references to farming and more support for food growing than the existing Plan.
- 7.9 **The Committee supports Policy 7.22 (Land for food), which encourages and supports thriving farming and land-based sectors in London, particularly in the Green Belt, particularly as it goes further than the existing Plan and encourages the use of land for growing food nearer to urban communities.**
- 7.10 **The Committee also supports those aspects of the policy that support borough protection of existing allotments and the identification other potential spaces that could be used for community gardening.**
- 7.11 **The Committee supports the policy to encourage innovative approaches to the provision of new growing spaces including the use of green roofs.**
- 7.12 **There are further opportunities to emphasise the importance of agriculture for example Policy 7.16 (Green Belt) as, currently, it only refers to the objectives of PPG2 and does not specifically point out the importance or benefits of agricultural uses in the Green Belt.**
- 7.13 The Committee welcomes the addition to Policy 7.14 (Improving air quality) that development proposals should be 'air quality neutral'. We note the Assembly Environment Committee's response to the draft Mayor's Air Quality Strategy, and would welcome the inclusion of measures to

improve air quality in London in the next draft of the London Plan¹⁵. This policy should also refer to reducing the need to travel.

8. Implementation and Monitoring

- 8.1 When the Mayor's proposals were prepared the policies were based on projections produced on the research and evidence available at the time. The Committee agrees with the Mayor's acceptance that while these give a sound basis for the Plan's overall direction and policies, it is important to understand that circumstances can change.
- 8.2 The Committee also agrees that it is "vital that we can adjust, especially to changes that could give rise to re-consideration of the Plan's direction or policies, either in part or in whole. This approach is at the heart of the plan-monitor-manage process."
- 8.3 Planning Policy Statement 11: Regional Spatial Strategies sets out the need for clear arrangements for monitoring and how it is intended that the spatial strategy will be implemented.
- 8.4 The London Plan has evolved over a number of years and iterations. However, the Key Performance Indicators (KPIs) (Table 8.1) are largely unchanged from the previous version of the Plan (except for the addition of KPI 10 Loss of garden land). We understand that retaining KPIs from the existing Plan enables consistency and helps monitoring progress over time, however the Committee would welcome reassurance that the 24 KPIs in the draft Plan are the correct indicators to be monitoring and are sufficient to cover the policies of the Plan.
- 8.5 It is a statutory requirement to produce an annual monitoring report on the implementation of the London Plan that is based around these KPIs. This provides a valuable opportunity to test how the Plan is working in practice, and as such it should be ensured that monitoring is carried out in the most effective way possible. Where it is helpful to boroughs, and avoids duplication of work, there could be a case for some KPIs to be linked to relevant National Indicators. It should also be insured that new policies in this draft London Plan, such Urban Greening (5.10) and the target to increase the surface area greened in the Central Activities Zone by at least five percent by 2030, have a KPI in the London Plan unless they are going to be effectively monitored through another Mayoral Strategy or policy.
- 8.6 **We invite the Mayor to include key stakeholders in the review of the monitoring process as before.**

Implementation Plan

- 8.7 Finally, the Committee notes that a key aspect of the Plan is the introduction of an Implementation Plan as suggested in PPS11: Regional

Spatial Strategies. The Implementation Plan will be published as a separate document to the London Plan and will be monitored with progress reported annually within or alongside the Annual Monitoring Report. Our comments in paragraphs 8.3 – 8.5 above equally apply to the Implementation Plan and the Committee would welcome reassurance that actions in the Implementation Plan are sufficiently comprehensive to cover the full scope of policies in the Plan.

8.8 The Committee expects that the Implementation Plan will be a subject of discussion at the Examination in Public.

Appendix A - Planning and Housing Committee Response, July 2009

Mayor's consultation on the London Plan - London Assembly Planning and Housing Committee Response, July 2009

1 Introduction

- 1.1 On 29 April 2009 the Mayor published his proposals to revise the London Plan for initial consultation with the London Assembly.
- 1.2 The London Plan – the Spatial Development Strategy – is perhaps the most important policy document that the Mayor is required to produce. It sets out an economic, environmental, transport and social framework for the development of London over the next 20-25 years. It is an over-arching document that picks up on the “places and spaces” aspects of all the other Mayoral strategies, and provides the strategic, London-wide context within which boroughs must set their planning policies.
- 1.3 The Mayor published “Planning for a Better London” in July 2008 that set out the Mayor’s approach to planning issues, and explained the key areas he wanted to address in revising the London Plan.
- 1.4 The Committee notes that the overall content and policy emphasis of this document logically follows the direction set by the Mayor’s election manifesto commitments – for example greater emphasis on the quality of life for Londoners, more detailed policies for Inner and Outer London, a broader based economy, protection for green and open spaces, and protection for heritage. It also signalled a more consensual and less directive approach.

2 Background

- 2.1 The Assembly’s response to the Mayor’s consultation is based on a number of meetings of the Planning and Housing Committee over the previous 8 months. These include
 - A meeting with Sir Simon Milton, London Plan Team and invited experts (9 June 2009)
 - Informal meeting with invited experts to discuss the London Plan proposals (7 May 2009)

- Meeting with the Chair of the Outer London Commission (28 April 2009)
 - Meeting on London's suburbs (17 March 2009)
 - Meetings on housing strategy related issues (October, December 2008)
- 2.2 These meetings covered various issues relating to the development of Mayoral strategies and aspects of the London Plan. Relevant themes in the past year that relate to the current London Plan review included housing issues, the state of suburban London and policy proposals for using section 106 to fund Crossrail.

3 Current stage of the London Plan review

- 3.1 The Committee welcomes the opportunity to comment on the Mayor's proposals at this stage of the development of the London Plan and notes that this consultation period ends on 30 June 2009 after which a further version of the Plan will be sent out for public consultation in September/October 2009.
- 3.2 The Committee intends to contribute to the various stages of the subsequent review process up to the Examination in Public in the summer of 2010 as policy proposals are developed in more detail.
- 3.3 The Committee notes that this is intended to be a complete replacement of the existing London Plan. It appreciates that this version of the London Plan is not a draft plan but a summary document of policy directions and the level of detail in this document is comparable to the level of detail that was produced by the previous administration when consulting on the comparable stage of the London Plan development in May 2001.
- 3.4 The Committee therefore does not wish to address each of the 190 policy proposals or the 21 questions posed in the consultation. It will however take the opportunity to make specific and more detailed comments on the policies in the London Plan as they develop.
- 3.5 The Committee believes it has engaged positively and productively with the Mayor when he consults the Assembly on detailed policies to achieve his stated objectives (such as meeting his affordable housing targets and securing section 106 funding for Crossrail) and it looks forward to

contributing to the London Plan revision as and when more policies are developed.

- 3.6 Until those detailed policies are available this response will focus on some of the high level strategic issues that underpin the Plan's basic assumptions and a number of policy proposals that have been examined so far during the Committee's work.
- 3.7 The Committee was told that this is the only opportunity that the Assembly and GLA functional bodies will have to respond to the "Initial Proposals" before it goes to public consultation. It is of some concern to the Committee that the lack of detail prevents any real scrutiny and to an extent denies the Assembly the opportunity to comment on draft policies ahead of the public consultation.

4 Mayor's approach, vision and objectives

- 4.1 The Committee notes the Mayor's intention to make the new Plan shorter, more strategic and user-friendly, arranged in more topic-based chapters that should make finding policies on particular issues easier to find. It also notes the intention to provide a stronger spatial emphasis for the Plan.
- 4.2 The Committee recognises the complexity of developing a spatial development strategy for London, and the challenges of reconciling a wide range of often competing priorities. The Mayor must ensure that the next iteration of the plan is sufficiently detailed and show how his priorities are addressed to avoid any lack of clarity.
- 4.3 The Committee welcomes the Mayor's approach [as set out in 4.1 above] but would wish to see that the benefits of the existing document in terms of dealing with the complex inter-relationships of the cross cutting themes is not lost. The Mayor should ensure that the policies that contribute to all six objectives of his plan are identified and that they are dealt with and co-ordinated across all topic based chapters. This should include cross-referencing where appropriate and should indicate more clearly how the plan brings together and integrates the following strategies: housing, transport, economic development, climate change mitigation and energy, and climate change adaptation, among others.
- 4.4 The Committee welcomes the strong steer the Mayor gives in his foreword as to what his vision might be:

“We have sought to place environmental sustainability at the heart of our approach because job security, energy security and climate security are all interlinked and must inform our policies on housing, transport and quality of life” (page 7).

- 4.5 **The Committee welcomes this statement that aligns sustainable growth with tackling climate change, integrating economic, social, and environmental priorities and giving a strong vision, which should be reflected in the objectives and the rest of the document.**
- 4.6 Further to support for the Mayor’s foreword, the Committee suggests that these underlying or cross cutting themes need to be more clearly identified and brought out in the plan itself. The Committee suggests the following themes should be also be reflected in the Mayor’s objectives:
- Tackling/addressing climate change.
 - Managing London’s population and economic growth sustainably.
 - Tackling poverty and inequality and promoting inclusion.
 - Ensuring a high and improved quality of life.
- 4.7 Overall the Committee welcomes the Mayor’s intention for a more strategic approach to planning decisions and this is reflected in his desire not to intervene in local planning decisions unless it is to intervene effectively and where strictly necessary to promote his strategic planning goals.
- 4.8 But in order to ensure boroughs have the clear direction that a strategic plan should provide the Mayor needs to provide greater detail in the draft Plan in order to demonstrate how his vision will be delivered and how his expectations for the future development of London can be translated into local decisions by boroughs.

Mayor’s vision and objectives

- 4.9 The Mayor’s vision is to ensure that over the years to 2031, London excels among global cities - expanding opportunities for all its people and enterprises, achieving the highest environmental standards and quality of life and leading the world in its approach to tackling the urban challenges of the 21st century.

4.10 The Committee welcomes the Mayor's vision for London and his 6 associated objectives and notes that this provides a degree of continuity in terms of endorsing the existing Plan's emphasis on managing London's economic and demographic growth; protecting and enhancing London's world city role; addressing climate change and environmental quality.

4.11 In many respects the degree of continuity is appropriate for a strategic plan that shapes the long-term development of London. However, the Mayor's foreword recognises that London 'needs to set a new course for [its] development over the next twenty years'. The Mayor's new plan must show how it will achieve this and deliver a sustainable London where all of us living here now can meet our needs without compromising the ability of future generations to meet theirs; a London with fewer emissions, less waste, less poverty, and less inequality.

4.12 It is important that the Committee can see what proposals are developed that set out how the Mayor intends to move from the current situation to the realisation of his vision by 2031. The Committee suggests that the full draft Plan sets out the likely effects of the London Plan's policies up to 2031, and some of the changes it expects to see in London during this period.

4.13 The Committee therefore suggests that the Mayor make explicit in the public consultation version of the Plan the following:

- What needs to change in London?
- Where will it change? and;
- How will it change?

4.14 This vision is reflected in the Mayor's 6 objectives for London:

- A city that meets the challenges of economic and population growth
- An internationally competitive and successful city with a strong and diverse economy - at the leading edge of innovation and research
- A city of diverse, strong, secure and accessible neighbourhoods and a high quality environment for individuals to enjoy, live together and thrive.

- A city that delights the eye
- A world leader in improving the environment locally and globally, taking the lead in tackling climate change, reducing pollution, developing a low carbon economy
- A city where it is easy, safe and convenient for everyone to access jobs, opportunities and facilities with an efficient and effective transport system

4.15 The Committee believes that the Mayor's objectives would be strengthened by amending objective 1 to read: "A city that meets the challenges of economic and population growth whilst maintaining and enhancing London's open space."

4.16 The Committee also notes the Mayor's duties on housing, health inequalities, and social development. As these are not specifically mentioned in the proposed objectives, the Committee suggests that the final plan should clearly show how they will be taken into account in any planning decisions taken by the Mayor.

Sustainability Appraisal

4.17 One criticism of previous Plan revisions was the absence of a sustainability appraisal and so the Committee welcomes the publication of the Integrated Impact Assessment (IIA) Scoping Report (May 2009) and that it is synchronous with the drafting of the London Plan is a positive step.

4.18 As this will be the second London Plan the Committee would expect the IIA to include a progress report on how far the first Plan is achieving its objectives and targets.

4.19 Monitoring progress will be critical if things are not happening soon enough, particularly important when tackling climate change.

4.20 However the Committee notes that at this stage in the review process the underlying assumptions for growth are still being finalised and modelling work on different options to assess their impacts (principally environmental and transport impacts) is still underway. A final set of options and the results of the modelling work will be feed into the IIA process, which will then explore any wider sustainability impacts.

4.21 As part of this work the Committee suggests that the Mayor needs to consider the challenges that some of the emerging trends such as accelerating climate change, persistent poverty and inequality, the need to diversify London's economy to ensure resilience and the potential for reduced availability of funding for London's transport and social infrastructure, especially from Section 106 contributions, in the short, medium and longer term.

5 A Resilient Plan - Choices and contingencies

5.1 This draft of the Plan is underpinned by a set of projections that show:

- That the period up until 2031, London's population is likely to increase from 7.56 million to between 8.79 and 9.11 million.
- There will be household growth of between 720,000 and 860,000 by 2031.
- The total number of jobs in London could increase from 4.7 million in 2008 to 4.9 million by 2016 and 5.3 million by 2031.

5.2 However, projections from the past are not always the most reliable guide to the future and it is important that the Mayor commits himself to continuous monitoring of the underlying assumptions.

5.3 A resilient, sustainable economy, one that is underpinned by improved quality of life going forward, requires flourishing local economies and an economy that is more diversified both spatially and sectorally. London should be low carbon, with greater access to employment opportunities for people the Mayor himself describes as "those facing the greatest disadvantage"¹⁶. The plan needs to show the stages of this journey over the next twenty years and how the spatial development of London will need to change.

5.4 The fundamental basis of the original Plan, and the research that underpinned it, was developed almost 10 years ago. The Mayor's London Plan must take into account climate change, growing inequality, and the threats to London's economy that reliance on banking and finance services have shown. The Committee is concerned that the Mayor should demonstrate that he has taken into account the latest evidence to underpin his assumptions on economic growth and the challenges to the environment.

- 5.5 The Committee received an assurance that there is a comprehensive and ongoing research programme to support the evidence base for the overall population and economic projections and that work was progressing on the implications of those for demand for transport infrastructure and associated investment, and the impact of economic trends on the demand for floor space and what is happening to London's town centres. The Committee would welcome the opportunity to examine this research programme and looks forward to the Mayor giving it access to the data.
- 5.6 The research programme needs to be communicated as widely as possible and must be a part of the sustainability appraisal so that potential options/scenarios can be tested prior to more detailed policies being developed and consulted on publicly.

6 London's Places

- 6.1 This Chapter brings together the policies that on the broad development strategy and the sub-regions, central activities zone and growth areas of London. It also incorporates the more spatially-specific aspects of town centres, offices and industrial locations and the open and natural environment.
- 6.2 The initial proposals document refers to the work being undertaken by the Outer London Commission to consider whether Outer London has the capacity to accommodate more economic growth. The Commission is due to report to the Mayor in July and the Mayor will consider which of its recommendations will be incorporated into the London Plan.
- 6.3 The Committee strongly supports the concept of a polycentric London. A long standing criticism of the current London Plan is that despite enabling Croydon and planning for two growth hubs, Brent Cross/Cricklewood and Stratford, and identifying opportunity areas, it is excessively primarily focussed on promoting employment growth in Central London, leaving Outer London in the short term to serve the role of providing homes to workers who must travel to jobs in the centre. The Committee welcomes the Mayor's intention to give a stronger policy focus and support for Outer London and emphasises that it must concentrate on developing local economies.
- 6.4 The Committee notes the early proposals of the Outer London Commission to promote a series of "super growth hubs" over and above those that currently exist or are planned for. Whilst growth hubs are certainly

appropriate for some areas, especially Croydon, this model may not universally apply across London. The Mayor should ensure that any proposals for new growth hubs take account of the local economic context and the potential effect on neighbouring town centres.

6.5 In addition to growth hubs the Mayor may wish to consider options such as growth corridors:

- Linking central London through outer parts of the capital to growth zones in the wider south east, to revive Outer London through its centres and other development nodes, located on or linked to key rail investment corridors
- Designate growth poles in growth corridors Instead of three or four super-hubs, with improved transport investment to support development
- Outer London growth needs to be considered in the light of the links to the rest of the South East beyond London. These economic links all require improvements in connectivity and the Mayor may wish to consider a concept of “super growth corridors” rather than super hubs, but links with the rest of the South East will need machinery and resources to make them effective.

6.6 Suburbs need new economic drivers to increase their sustainability and for them to become more self-sufficient centres, which make a greater contribution to the polycentric London region.

6.7 Maintaining and enhancing a range of employment uses in suburban areas is important to support sustainable communities. As employment uses become increasingly compatible with residential environments, there may be growing opportunities for local employment activities, including home-working and live/work spaces.

6.8 Many of the economic sectors in which London currently excels in are, and will continue to be, located in central London because of the tendency to agglomerate. Policies to improve the economic environment in Outer London should be focused on businesses that do not naturally agglomerate. These could include, for example, urban agriculture and street markets.

- 6.9 The Mayor should set out in his London Plan what support the planning system could give to boroughs to promote new ways of working, including exploiting information and communications technology, in a way that makes suburban areas and town centres more appropriate places to work from.
- 6.10 In adding the spatial dimension to the London Plan, in terms of where growth takes place there must be linkages between transport investment and development policies. The Mayor needs to decide how growth should be informed by decisions on the availability of funding for transport or social infrastructure. This does not mean that investment is predicated on existing need but that place making, especially new housing developments, need infrastructure investment to make them viable.
- 6.11 The London Plan should do more to minimise the additional travel demand that new homes and jobs will generate and this means that ways of encouraging job growth where people live will be important. The Mayor should make greater use of land use policy as a travel demand management tool as polycentric patterns of development offer more opportunities for much shorter trips that could be made by cycling or on foot.
- 6.12 The use of planning policy to help manage travel demand should include consideration of what modal shift from private car journeys to more sustainable alternatives will be needed in order to meet the Mayor's objective of tackling climate change and reducing pollution.
- 6.13 Outer London town centres need to act as radial transport hubs so that commuters can travel in and out from the surrounding suburbs. However, to support sustainable economic development the Mayor must also encourage greater investment in Outer London transport improvements, particularly orbital links wherever this is financially possible.

7 London's People

- 7.1 The Committee has already made its comments to the Mayor on his proposals contained in his housing strategy. In his response the Mayor accepted some of the Committee's recommendations but declined to revise his strategy for others.
- 7.2 The Mayor is working with boroughs and other partners on a Strategic Housing Land Availability Assessment (SHLAA). This will provide a key

part of the evidence base for new housing targets for London on a collaborative basis with boroughs. The results of the SHLAA will be published in Autumn 2009. The Committee will comment when this is available and implications are known.

- 7.3 The Committee recognises that some estate renewal schemes will inevitably be at lower densities in order to accommodate larger affordable housing and this will mean net losses on individual schemes. However, overall the Mayor should encourage the net addition to London's affordable housing stock.
- 7.4 The Committee notes the Mayor's intention to develop local housing targets collaboratively with boroughs. However, if boroughs fail to agree affordable housing targets, the Mayor will need to outline what steps he will take to ensure his targets for the strategic supply of affordable housing in London can be met.
- 7.5 The Committee supports the Mayor's intention that the new London Plan should strongly promote high quality urban environments contributing to a high and improving quality of life. The Plan must make clear the expectation that the highest design and quality standards will guide all new developments and this should reflect the highest possible standards – of design, internal space standards/room size, play and recreation space, energy efficiency or water conservation.
- 7.6 The Committee welcomes the Mayor's intention to "optimise" rather than "maximise" housing density, and looks forward to seeing how this will be put into practice. However, any optimisation should also take into account the need for new homes in London that do not encroach on open space.
- 7.7 The Mayor's final Housing Design Guide must set out the essential requirements for all new build housing that contains affordable units or has public sector funding.
- 7.8 The Committee also recommends that the Plan allows Local Authorities to respond in a way that is sensitive to the local context in terms of the size mix and densities of new housing developments. The Mayor should also work towards improving space standards in the private sector to establish a 'level playing-field' across tenures and to tackle the identified poor space standards that have characterised new homes in London.

- 7.9 The Committee awaits the Mayor's detailed proposals for looking at new ways of delivering services, unlocking new resources, better aligning public sector investment programmes and making existing resources work more effectively.
- 7.10 The Mayor needs to emphasise the importance of planning for social infrastructure, so that it supports London's growth and regeneration.

8 London's Economy

- 8.1 The key objective of Chapter Four – London's Economy is to ensure that London meets the challenges of economic and population growth and is an internationally competitive and successful city, and to provide the planning basis for the continued growth and economic development of all parts of London.
- 8.2 It is expected that the Economic Development, Culture, Sport and Tourism Committee will be making contributions to the Mayor's economic development strategy as is developed over time.
- 8.3 The Committee strongly supports the Mayor's intention that the Plan should provide a planning basis for managing growth and economic development of all parts of London. It especially welcomes the recognition that London's economy needs to diversify away from a reliance on financial services to one that provides support for sectors such as the universities, medical services and research, science, the creative and cultural industries.
- 8.4 The land/workspace requirements of manufacturing, accommodating existing sectors like logistics and the growing "services for the service sector", sites for essential services such as waste, and making provision for emerging essential new sectors such as green industries must be safeguarded. This should be a priority; in particular land is absolutely necessary for the jobs growth predicted in climate change related industries and must be protected for this.
- 8.5 The Committee has already commented on the need to encourage employment sectors in Outer London that do not need to agglomerate to thrive (paragraph 6.8 above). As part of the move to diversify London's economy the Plan should encourage the development of these types of companies and sectors across London.

- 8.6 In terms of Strategic Industrial Locations the Committee welcomes the intention to take a more rigorous approach to the release of industrial land but the detail will be in how this will be achieved. This is important because, along with the support of the LDA in encouraging the development of a Green Enterprise Zone in the Thames Gateway it will be absolutely vital the Plan anticipates the inevitable growth and related land requirements needed to foster green industries in London in the future and guarantees there are adequate sites and the potential for this growth. These will be the industries of the 21st century.
- 8.7 Similarly the Committee welcomes policy proposals that focus on the needs of small and medium-sized enterprises, particularly those that ensure availability of affordable work space. The Committee also welcomes support for local street markets.
- 8.8 The Committee recommends a specific reference in the London Plan to local shops and the value of local shopping parades. There should be a general presumption against loss of these without replacement. The Committee also recommends a specific reference to the value of local pubs.
- 8.9 The London Plan should also support local authorities, if they so choose, to make planning judgements based on the local economy, in addition to the wider London economy.

9 London's Response To Climate Change

- 9.1 The key objective of Chapter Five – London's Response to Climate Change is to ensure that London is a city that becomes a world leader in improving the environment and to use the London Plan to ensure that the planning system makes the fullest contribution to the mitigation of and adaptation to climate change.
- 9.2 It is expected that the Environment Committee will be making contributions to the Mayor's environment, climate change adaptation and mitigation strategies as they are developed over time.
- 9.3 The Plan proposes policies that:
- Promote a balanced approach to encouraging sustainable energy in new development

- Develop a pragmatic approach to stimulating the uptake of renewable energy
- Strengthen the policy approach to energy efficiency and conservation in the design of new buildings
- Strengthen the policy approach to promote area based heating and cooling networks
- Manage as much of London's waste within London as practicable
- Adopt a more flexible approach to waste self-sufficiency so that the carbon outcome of the treatment method and transportation are given greater consideration.
- Move towards fewer, larger waste sites
- Support a comprehensive infrastructure for electric vehicles across London, especially charging points.

9.4 The Mayor will also set challenging CO2 reduction targets to achieve a 60 per cent reduction in emissions below 1990 levels by 2025.

9.5 The Committee strongly supports the comprehensive attention and importance given to considering climate change adaptation and mitigation that the policy directions infer. However, these policy directions are in advance of the publication of the Mayor's Climate Change Mitigation and Energy Strategy, which makes it hard to assess their contribution to meeting the Mayor's 60 per cent CO2 reduction target by 2025.

9.6 Further drafts of the London Plan need to show how each London plan policy or group of policies will contribute to delivering a 60 per cent reduction in CO2 by 2025.

9.7 The Committee also understands that the Mayor is keen to avoid a directive or prescriptive approach to aspects such as renewables where technology is advancing rapidly and innovation should not be stifled.

9.8 The Committee understands this concern and, in order that the Plan reflects the Mayor's vision for London to become a world leader in improving the environment the Mayor must ensure that the London Plan policies are explicit and do not allow room to accept sub standard

developments, practices or technology in London's response to Climate Change.

- 9.9 There are a number of specific issues that need to be covered in further revisions of the Plan. In addition to some large waste sites there need to be neighbourhood sites in order to take some of the new technologies (gasification, anaerobic digestion etc) producing renewable gas.
- 9.10 A neighbourhood approach to local energy generation systems, renewables and CCHP units should be detailed in further revisions of the Plan.
- 9.11 Safeguarding wharves should be detailed in further revisions of the Plan. Allowing development on wharves fosters 'hope value'. These are low value sites and their river related uses (reprocessing aggregates, recycling industries, paper mills etc) must be safeguarded and promoted, in the interests of sustainable transport and tackling climate change, as once lost to development they can never be replaced.
- 9.12 The Committee will return to the Mayor's policies on Climate Change when more details have been developed in later versions of the Plan.

10 London's Transport

- 10.1 The key objective of the transport proposals in the London Plan is to create "A city where it is easy, safe and convenient for everyone to access jobs, opportunities and facilities with an efficient and effective transport system, which places more emphasis on walking and cycling and making better use of the Thames, and supporting delivery of all the objectives of this Plan."
- 10.2 It is expected that the Transport Committee will be making contributions to the Mayor's transport strategy as is developed over time.
- 10.3 Many other of the Committee's transport related comments are detailed in the section on Chapter Two – London's Places above.
- 10.4 The projected increase in housing, population and employment will create significant challenges for London's transport system that is already at or nearing capacity in some areas, particularly during the peak periods.

- 10.5 The Plan will need to identify where planned growth in jobs and population will require work to be done to anticipate improvements needed in the public transport system to sustainably cope with development.
- 10.6 The Mayor has taken the decision to remove major transport proposals from the TfL Business Plan due to lack of available funding.
- 10.7 The Committee understands the Mayor's rationale as it applies to the shorter term Transport Strategy, however the London Plan is intended to deal with a far longer time period than other strategies such as housing, economic development and transport.
- 10.8 Therefore, mindful of the role of transport in accommodating sustainable growth, the Committee would encourage the Mayor to indicate where new transport schemes may be necessary in the long term, subject to changing circumstances.

11 London's Quality Of Life

- 11.1 The key objective of Chapter Seven – London's Quality of Life contribute to meeting the objectives that ensure London is: an internationally competitive and successful world city; a city of diverse, strong, secure and accessible neighbourhoods; a city that becomes a world leader in improving the environment and a "city that delights the eye".
- 11.2 It brings together policies currently covered by "Enjoying London", "Designs on London" and "The Blue Ribbon Network".
- The Committee strongly welcomes policy proposals that will:
 - Protect, promote and improve access to the network of open spaces, strengthening the promotion of urban greening and urban agriculture.
 - Extend green grid principles from East London to a London wide project and provide the basis for supplementary guidance as a mechanism for developing implementation priorities in sub regional partnerships.
 - Strengthen protection of local open spaces, including playing fields.
 - Set out policies to protect street trees and secure tree planting in new development.

- Consider developing minimum standards for large emitters of pollution, such as biomass plants and large Combined Heat and Power plants.
- Give a presumption against development in back gardens.
- Strengthen London's protection against flooding.

11.3 The Committee would ask the Mayor consider the findings and recommendations of forthcoming Committee work on the planning policy implications of commercial agriculture and the protection and enhancement of London's war memorials as they are published in future versions of the London Plan.

11.4 The Committee welcomes the Mayor's intention to support tall buildings only in locations where they are appropriate.

Appendix B Orders and translations

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Vietnamese

Nếu ông (bà) muốn nội dung văn bản này được dịch sang tiếng Việt, xin vui lòng liên hệ với chúng tôi bằng điện thoại, thư hoặc thư điện tử theo địa chỉ ở trên.

Greek

Εάν επιθυμείτε περίληψη αυτού του κειμένου στην γλώσσα σας, παρακαλώ καλέστε τον αριθμό ή επικοινωνήστε μαζί μας στην ανωτέρω ταχυδρομική ή την ηλεκτρονική διεύθυνση.

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Punjabi

ਜੇ ਤੁਸੀਂ ਇਸ ਦਸਤਾਵੇਜ਼ ਦਾ ਸੰਖੇਪ ਅਪਣੀ ਭਾਸ਼ਾ ਵਿਚ ਲੈਣਾ ਚਾਹੋ, ਤਾਂ ਕਿਰਪਾ ਕਰਕੇ ਇਸ ਨੰਬਰ 'ਤੇ ਫ਼ੋਨ ਕਰੋ ਜਾਂ ਉਪਰ ਦਿੱਤੇ ਡਾਕ ਜਾਂ ਈਮੇਲ ਪਤੇ 'ਤੇ ਸਾਨੂੰ ਸੰਪਰਕ ਕਰੋ।

Hindi

यदि आपको इस दस्तावेज़ का सारांश अपनी भाषा में चाहिए तो उपर दिये हुए नंबर पर फोन करें या उपर दिये गये डाक पते या ई मेल पते पर हम से संपर्क करें।

Bengali

আপনি যদি এই দলিলের একটি সারাংশ নিজের ভাষায় পেতে চান, তাহলে দয়া করে ফো করবেন অথবা উল্লেখিত ডাক ঠিকানায় বা ই-মেইল ঠিকানায় আমাদের সাথে যোগাযোগ করবেন।

Urdu

اگر آپ کو اس دستاویز کا خلاصہ اپنی زبان میں درکار ہو تو، براہ کرم نمبر پر فون کریں یا مذکورہ بالا ڈاک کے پتے یا ای میل پتے پر ہم سے رابطہ کریں۔

Arabic

الوصول على ملخص لهذا المستند بلغة،
فجاء الاتصال برقم الهاتف أو الاتصال على
العنوان البريدي أو عنوان البريد
الإلكتروني أعلاه.

Gujarati

જો તમારે આ દસ્તાવેજનો સાર તમારી ભાષામાં જોઈતો હોય તો ઉપર આપેલ નંબર પર ફોન કરો અથવા ઉપર આપેલ ટપાલ અથવા ઈ-મેઈલ સરનામા પર અમારો સંપર્ક કરો.

Appendix C Principles of scrutiny page

An aim for action

An Assembly scrutiny is not an end in itself. It aims for action to achieve improvement.

Independence

An Assembly scrutiny is conducted with objectivity; nothing should be done that could impair the independence of the process.

Holding the Mayor to account

The Assembly rigorously examines all aspects of the Mayor's strategies.

Inclusiveness

An Assembly scrutiny consults widely, having regard to issues of timeliness and cost.

Constructiveness

The Assembly conducts its scrutinies and investigations in a positive manner, recognising the need to work with stakeholders and the Mayor to achieve improvement.

Value for money

When conducting a scrutiny the Assembly is conscious of the need to spend public money effectively.

Endnotes

¹ London Assembly response to the Mayor's consultation on the draft further alterations to the London Plan, July 2006: Paragraph 7.3

<http://www.london.gov.uk/assembly/reports/plansd/response-lp-further-alt.s.pdf>

² <http://www.london.gov.uk/assembly/reports/plansd/housing-strategy-response.pdf>

³ Sir Simon Milton, Planning and Housing Committee, 2 December 2009

⁴ Planning Policy Statement 3: Housing

⁵ <http://www.london.gov.uk/mayor/priorities/housing.jsp>

⁶ Planning and Housing Committee, 14 July 2009

<http://www.london.gov.uk/assembly/planning/2009/jul14/minutes/ph-transcript-140709.pdf>

⁷ Providing for Children and Young People's Play and Informal Recreation

<http://www.london.gov.uk/mayor/strategies/sds/docs/spg-children-recreation.pdf>

⁸ Paragraph 8.3 <http://www.london.gov.uk/assembly/reports/plansd/london-plan-assembly-response-140709.pdf>

⁹ Planning and Housing Committee 9 June 2009

<http://www.london.gov.uk/assembly/planning/2009/jun09/minutes/transcript.pdf>

¹⁰ The TCPA response to the Mayor's consultation also refers to the need to improve upon existing climate change policies.

¹¹ Draft replacement London Plan paragraph 6.2

¹² London Assembly response to the Mayor's consultation on the draft further alterations to the London Plan, July 2006: Paragraph 10.8

<http://www.london.gov.uk/assembly/reports/plansd/response-lp-further-alt.s.pdf>

¹³ Mayor of London, letter to Darren Johnson (unpublished) 18 December 2008

¹⁴ Cultivating the Capital - Food growing and the planning system in London, January 2010 <http://www.london.gov.uk/assembly/reports/plansd/growing-food.pdf>

¹⁵ <http://www.london.gov.uk/assembly/reports/environment/interim-response-to-mayor-clearing-the-air.pdf>

¹⁶ Mayor's Foreword, p.7 (A new plan for London, April 2009)

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