

Boris Johnson
Mayor of London
City Hall
The Queen's Walk
London SE1 2AA

Date: 08 February 2016

Dear Boris,

Intensification Areas in the next London Plan

This letter sets out the findings from the Regeneration Committee's work to examine the effectiveness of the Intensification Area (IA) designation on regeneration. We held a formal meeting to discuss Intensification Areas on 3 November 2015 with representatives of the GLA, TfL, London First, and LB Haringey. The Committee also used its December meeting to visit two IAs; the Mill Hill East and West Hampstead Interchange Intensification Areas, where we heard from developers, borough planning officers and residents' groups.

Our review has focused on the rationale for selecting areas, the relationship between the GLA and boroughs, and the implications of intensified development in these areas. The Committee has identified a number of findings and recommendations that the new Mayor of London should consider when producing the new London Plan, as set out below.

The impact of Intensification Area designation remains unclear. We heard that local communities would welcome greater information about the implications of IA designation, as we found that IA status can place considerable pressure on community infrastructure. At our site visit we heard from residents who are concerned about the impact of intensification on the wider community. For example, groups observed that local communities around West Hampstead Interchange were not fully aware that the area had been designated as an area for intensification and hence likely to experience rapid growth. Further information on the implications of development plans, for example the number of new developments, and the demand this will place on local services, does not appear to be readily available at the sites we visited. Therefore, in the next iteration of the London Plan, the GLA should clearly set out the expected value added from giving an area Intensification Area status. If IA designation is to add value, areas require pre-planning support for transport, social infrastructure, and adequate public consultation to inform communities about what the designation will mean for the local community.

Crucially, areas selected for intensification must have adequate transport infrastructure. The GLA told us that Intensification Areas in the London Plan have been selected as “built up areas with good transport accessibility that can support redevelopment at higher densities.” However, this doesn’t always seem to be the case. At Mill Hill East in particular, the Committee found that the existing transport infrastructure will struggle to accommodate the needs of the growing community. The single track tube stop serving a branch of the Northern line is currently insufficient for commuters to central London and suffers from severe overcrowding. Housing development in Mill Hill as part of the Intensification Area will put further pressure on an already inadequate service. The Northern Line connection from Finchley Central to Mill Hill East runs as a shuttle service, and little thought appears to have been given in the planning stages to how it would deal with the new population. In future, a transport impact assessment should be undertaken at the time of designation and made available to the local community. It is particularly important that the GLA addresses issues relating to accessibility and the quality of the public realm to accommodate enhanced growth in IAs.

In the next London Plan the GLA should take greater account of the implication that development in Intensification Areas spills over into neighbouring areas. At West Hampstead, for example, it is clear that the Intensification Area designation has not only led to development within the boundary, but it has also attracted development in the wider area. The groups we spoke to observed that the volume of development had put significant strain on local infrastructure and services. For example, pressure for school places has increased, as has demand for access to local GPs. During the Committee’s November meeting, Stephen Kelly, Assistant Director for Planning, London Borough of Haringey, explained that IA designation can work against boroughs’ wider socio-economic objectives: *‘There are a series of measures that in this moment at time appear to be unhelpful for boroughs in terms of trying to deliver, support and maintain jobs and quality employment in certain areas.’*¹ However, the IAs we visited were previously judged to have sufficient capacity to accommodate growth, and therefore they had not received the support that Opportunity Areas would receive. This means that they did not receive support to develop a planning framework including an assessment of social infrastructure. In future, we would like to see the GLA support Intensification Areas with a needs assessment for social infrastructure.

Detriment to local character is another implication of overspill. The GLA sets out the Mayor’s commitment to retaining local character in new developments in Policy 7.4 of the London Plan. With this in mind, it is important that the GLA and boroughs carefully manage IA boundaries, to ensure that Intensification Area policy does not come at the expense of local character.

Intensification Areas also need support to protect employment land use alongside accommodating new housing. It is important that any future IA designation in the London Plan pays attention to the need to safeguard and expand employment uses, alongside residential development. At its meeting, the Committee heard that London’s housing shortage and high land values have given Intensification Areas a significant housing focus. However, at Mill Hill East, the Committee heard that with more mixed use development in IA plans, there could be

¹ Regeneration Committee transcript, 3 November 2015, p. 7

potential to provide more employment uses to create a better mix of developments. This is of particular concern at Mill Hill East where we saw there is a risk of creating a dormitory town.

Lastly, the GLA should create a system to establish development timescales for areas with formal designation in the London Plan, and improve its communication with the development sector. Faraz Baber, Executive Director for Policy, London First, observed that it is not enough for the London Plan to set out the locations and scale of potential development of Opportunity and Intensification Areas in the London Plan. He called for City Hall to take a more proactive role in designing a business plan for both IAs and Opportunity Areas. A business plan would help the GLA to prioritise the infrastructure, transport, utility and other services that designated areas will require. From the perspective of investors and planning applicants, Faraz observed that plans would *'be hugely influential in bringing that money and that investment quickly to those sites to come forward.'*² We agree that the GLA should commit to producing integrated business plans for areas with formal designation in the next London Plan, in addition to OAPFs.

We trust that the GLA will bring these issues to the attention of the next Mayor when producing the new London Plan. We understand that boroughs require further resource and support from the GLA to properly plan for development in Intensification Areas. The GLA should work closely with TfL to ensure that transport connections are already equipped to cope with additional passenger volumes *before* development begins, and there should be a greater emphasis on mixed use developments in order to avoid the creation of dormitory towns. It is equally important that the boroughs consult and involve communities in order to keep residents informed throughout development and ensure that boroughs have the resources to complete these projects successfully.

For reference, the full transcript from the Committee's meeting is available here:

<https://www.london.gov.uk/moderngov/ieListDocuments.aspx?CId=303&MId=5641&Ver=4>

I would be grateful to receive a response to the points raised above by Friday 11 March. Please send a copy of your reply to Rebekah Canning, Project Officer at rebekah.canning@london.gov.uk.

Yours sincerely,



Gareth Bacon, AM
Chairman of the London Assembly Regeneration Committee

Copied to Stewart Murray, Assistant Director, Planning

² Regeneration Committee transcript, 3 November 2015, p. 8