



## THE ROYAL TOWN PLANNING INSTITUTE – LONDON REGION

### THE LONDON PLAN

Memorandum of observations to the Greater London Authority  
on the  
Consultation Draft Replacement London Plan of October 2009, together with the  
Minor Alterations of December 2009

## INTRODUCTION

1. In preparing this memorandum, the Institute has consulted with members working for local government, the private and academic sectors, as well as community and voluntary bodies. It has also involved senior members with experience of spatial planning at the strategic level.
2. Although much of the Plan is not new, for instance the Key Diagram is largely unchanged, by initiating consultation upon replacement of the current document the entire document will be capable of review by the Inspector at the Public Examination.
3. This memorandum is presented in two parts:
  - Section A deals with general conceptual issues, the process of formulating the Plan and its delivery.
  - Section B addresses more detailed substantive issues of Plan content.

### SECTION A

4. **Role of a Spatial Development Strategy (SDS)** - PPS11 sets out Government Policy on Regional Spatial Strategies (RSS), which in London is the SDS, and this is summarised well in PPS12 as providing “*the overall spatial vision for the entire region, identifying the broad locations for growth, often by identification of sub-regions, and major infrastructure requirements, together with the housing numbers to be provided for in LDDs. The RSS is a product of effective engagement with local authorities and others. Therefore it provides the regional framework against which local participation in creating Sustainable Community Strategies and Core Strategies takes place*” (paragraph 3.1).

5. The SDS needs to address four, equally important, contextual roles and spatial relationships if it is to make a meaningful and relevant contribution to shaping London's Future. These are:
  - London as an internal set of functioning communities;
  - London's relationship to the adjoining Regions in the south east;
  - the rest of the UK, reflecting the capital city function; its impacts on London's economy and reciprocal economic development impacts; and
  - the wider world, reflecting the global city role that is crucial to London in particular, but which also has impacts on the second and third audiences identified above.
6. The draft SDS tends to lose sight of its higher level agenda and often concerns itself with development control detail, parts of it read more like a traditional, narrow land use unitary development plan than a strategic document. We question whether it is appropriate for the SDS to engage in detail, unless it is detail which has spatial and strategic London-wide significance. Just because something is applicable London-wide does not necessarily mean it is strategic and appropriately contained in the plan, particularly if this would lead to duplication of local policies. The plan might give direction or suggestions as to how the policy issue might be dealt with, including, where appropriate, such options as a London-wide SPD or joint DPDs/SPDs produced by groups of LPAs. The resulting shortening of the Plan and avoidance of duplication would be welcomed by its users.
7. **Evidence Base and Options** - Whilst the plan lists a large number of reference documents as background we would welcome clearer links between the plan's policies and the supporting evidence base - particularly in relation to the key areas of housing, employment and infrastructure. The draft SDS contains no consideration of other options and very little new evidence as such. To be determined as 'sound' a planning document should have a robust and credible evidence base and also must be the best option when considered against all the others. The Plan does not contain evidence that other growth scenarios and their effect upon differential demand in different key parts of London have been considered. In developing the plan, it is important to acknowledge and anticipate different future scenarios beyond the scope or control of the authoring body. Consideration should be given to long-term issues and impacts whereas the draft Plan assumes that once the current recession is over that London's economy (particularly the financial sector) will merely resume where it left off. As there is more limited development value available to be captured (and constrained public spending), it needs to be considered how the key social infrastructure, environmental and transport improvements are to be provided as well as where they are required. No thought is given to a strategy where significant projects such as Crossrail do not come forward within the current anticipated timescale.

8. In relation to housing the Mayor concludes that growth rates towards the lower end of the predicted increase can be adopted, and as a consequence of the removal of the fixed percentage requirement the provision of affordable housing is to fall considerably, despite evidence of population growth and increased affordability problems. The evidence arising from the Outer London Commission has been limited so far and only relates to economic performance. We know that thought was given to commissioning new research in relation to a number of areas, but we understand that little progress has been made so far and the validity of the evidence is in doubt.
9. The London Region would also welcome some analysis of how far the policies of the previous plans were delivered using the evidence of ‘outcomes’ as shown in the 5 London Plan annual monitoring reports published since 2004.
10. **Regional and Sub-regional Integration** - The inter-regional role is not well developed either in the existing plan or in the draft replacement and the spatial consequences of the SDS must be assessed in relation to housing, commercial activity and transport in the wider South East on which London depends so much. Given how many commute into London from the rest of the South-East, the Eastern Region and beyond, make the objectives in the existing Plan to be a ‘compact city’ impossible to achieve. The Greater London boundary, as well as internal borough boundaries, have little relevance in London’s day to day functionality. London cannot deliver a sustainable city on its own. Working with neighbouring Regions is only covered superficially, upon such matters as the growth rather than any actual means of delivery. Furthermore, no thought is given to the potential effect of a change in the nature of regional government being contemplated by the Opposition.
11. It is important to consider what the spatial implications of the SDS are for other parts of the UK and to do this within a wider context. The Plan requires a view on national spatial issues and its consequences for migration trends. The Plan should have a view on the wider national infrastructure and should consider the effect of the National Policy Statements, particularly that on the matter of ports. This will affect the amount of through freight traffic passing through London and the South East en route to or from European and other international destinations. This currently imposes a load on the London road and rail network and has an adverse effect upon air quality. The Plan will also need to consider what national alliances are required to deliver the strategy; for instance in terms of other metropolitan areas. The Mayor says that he supports the existing Green Belt but also the creation of rail freight exchanges around London. These are inevitably going to be in Green Belt locations and therefore very unpopular with the host authority and its electorate.
12. In the absence of a national spatial framework for England and the UK, the plan must be explicit about its assumptions elsewhere in the UK about growth and development (again, subject to sensitivity tests) and their implications for London's capital city/major service centre role.

13. **Delivery** - The key test for the Plan will be how it is delivered – both in strategic and project terms. In particular, how the Mayor and GLA will manage to secure co-ordinated integration with the private sector, as well as partner bodies and authorities in a time of reduced Government spending and constrained finance and credit. For instance, in the current market and given the likely level of infrastructure costs, delivering the potential housing capacity, transport and social infrastructure will be extremely challenging. The various potential funding sources need to be examined and then matched with the many objectives of the Plan. The role of the Treasury is completely overlooked in the current proposals even though there is doubt that the GLA is able to fund any of the major initiatives proposed. The RTPI has already questioned whether the potential sources of revenue to deliver “flagship” transport schemes, such as Crossrail are achievable. Firstly as the market is so fragile, but to assist schemes to come forward, many S106 contributions are being renegotiated so that the totals are being reduced or the developer only pays at a later date. Thus the £300m which the Mayor aspires to in relation to S106 payments towards Crossrail may not materialise before they are replaced by CIL. However, even the £600m which the Plan seeks towards the project is still nowhere near sufficient to deliver the scheme, which the draft plan anticipates as being 2017. Given the huge amount of transportation infrastructure already in place, the balance of emphasis should be placed on improving what is already there and strengthening orbital links, rather than providing yet more linear services.
14. The Plan often sees the need to replicate the UDPs/LDFs of the London borough councils, but this is not its role. There may be scope for the adoption of some cross-borough standards, but this may be better carried out through LDFs, with co-ordination by the GLA (see also para 6). Waste disposal is one example where the current document is short on the detail relating to the delivery of the Plan’s objectives. The document states that the SDS’s emphasis will be on reducing quantities of waste, rather than continuing to rely on landfill, or building new incineration facilities. However, no mechanisms are put forward within the document for achieving this reduction, neither is there any indication of timescale. Many of the counties in the surrounding Regions, that London relies upon to provide its landfill requirement, estimate that they will no longer have adequate capacity within the life-time of the London Plan. Any solution to the waste disposal issue must therefore be achieved within the short to medium term.
15. Compulsory Purchase Orders are only of assistance (Policies 2.7 & 4.2) if a development scheme, with a development partner, is in prospect. In any event the question has to be asked as to whether the GLA or its agencies are the right level of government to be promoting CPOs, rather than borough councils through the medium of LDF’s and their usual development control function.

## SECTION B

### 1. Context and Strategy

1.1. **Olympic Legacy** - This is arguably one of the most important projects affecting East London and yet the discussion of the Legacy is limited to two paragraphs (1.40 & 1.41). The matter has been moved into supplementary planning documents and should be embedded into the SDS itself.

### 2. London's Places

2.1. **Outer London** - The draft Plan apparently sets out to increase the role of the suburbs and yet the contribution to London's overall housing totals to be made from Outer London is set to fall in the revised plan when compared with the current Plan's allocation. Areas that are well located for transport choice should be rigorously assessed for their potential for meeting the capital's growth requirements.

2.2. **Central Activities Zone** - There is still a high reliance upon the "*financial and business services*" in the CAZ (policy 2.10) and the assumption that the economy will revert back to the situation immediately before the current recession. Considerable further development based upon this sector is envisaged for the CAZ/Isle of Dogs (more than 50% of the London total), but it is acknowledged that bringing this forward is going to depend upon Crossrail. It is questionable whether certain parts of the CAZ fringe and the, especially those in the South West of London are appropriate to this designation bearing in mind the level of infrastructure upgrade required and the question as to whether development in that part of London will generate the necessary value to provide it.

2.3. **Town Centres** - The draft Plan requires a more complete understanding of the complexities of outer metropolitan centres, whether in terms of their present or future functions, or how they and out-of-centre sites relate to each other. Residents in outer London and the suburbs now have much less developed allegiances to specific centres than they would have done historically. The vitality and viability of town centres so consciously promoted in PPS6 (and continued in to its replacement in PPS4), can be difficult to realise in the diffuse London pattern, with separate specialisations often within the same multiple chain (with representation in both the town centre store and the retail park). Historical hierarchies still have validity but should be treated with caution as the fortunes of different places change. For instance, Lewisham and Wembley are no longer anything like as significant as they were at the time of the GLDP; the impacts of Brent Cross, Bluewater and Lakeside have been considerable in north and east London. Nevertheless, there is spending capacity in many of the suburban centres and thought should be given to enabling and promoting development to encourage retailers to occupy space in such locations. Given that many traditional centres have declined as retail and employment centres, more scope should be given for encouraging new business locations, cultural and leisure hubs and more intensive housing, particularly close to transport networks. This mixed use, polycentric approach would accommodate a greater carrying capacity for the full range of London's functions, whether international, national or metropolitan and mitigate some of

the pressure on the central core.

### **3. London's People**

- 3.1. **Housing** - Most forms of existing land use are to be protected under the terms of the emerging SDS, but no thought is given to where development land is to be provided outside the Opportunity and Intensification Areas for the housing needed to meet the Borough totals in Table 3.1 which run to 2021. The Plan must make adequate provision for need and using the lowest end of the range for housing requirement risks further under-provision of the housing that is needed. The minimum housing provision in the Opportunity and Intensification Areas totals some 248,000, but this is over the whole plan period and the use of the lowest figure allows for no flexibility if these sites do not come forward for development, or at the indicated densities.
- 3.2. **Table 3.2 Density Matrix** – Whilst the principle of retaining the density matrix as a tool in development control decisions is supported, some of our members remain concerned that it tends to over-rely upon PTAL ratings to define appropriate density. Whilst this can be a good tool to assess connectivity of a development (on the assumption that detailed PTAL assessments are available and this is not always the case at the site specific level), it should only be part of an element to determining the appropriate density of an area. This is because the rating does not take into account factors such as service level and existing congestion levels, which will affect the capacity to accept more development. It also makes no distinction for places where large developments are proposed in areas of much smaller urban grain. We also recommend the GLA considers whether other software packages can provide a more accurate picture of public transport and general accessibility.
- 3.3. **Table 3.3 Space Standards** - Although not itself a strategic matter the inclusion of internal space standards for new market housing is welcomed by some of our members, although there remain questions about the impact of such a policy on the viability of some developments and its applicability to conversions, especially of historic buildings. There is also an issue with duplication of local policies, see our paras 6 and 14 above.

3.4. **Affordable Housing** - It is a requirement of both PPS3 (paragraph 28) and PPS12 (see quotation above) to have housing targets within the SDS and yet the existing Plan's 50% affordable housing target is to be removed. The latest evidence shows that there is an even greater need for affordable housing provision in London. Similarly there is no evidence to support the proposed change in the make up of the total affordable housing provision from 70:30 socially rented/intermediate housing to 60:40. However, given the current state of the economy and the weakness of the housing market, leaving the Boroughs to set targets in the short term is a flexible response to the difficulties, but this should be kept under close review as economic circumstances change.

3.5. Addressing the issue of housing type and tenure is crucial and has London wide significance. This is a strategic role rather than one which can be effectively tackled by borough councils individually, although targets will need to be appropriate to local circumstances. One of our members suggests an approach would be a formula which has London-wide spatial relevance in the SDS (i.e. not narrowly borough focused or borough-prepared), which provides the template for house type and tenure, particularly including those intermediate sectors of entry level private and family housing provision. It should seek to relate to other residential locational factors like educational and community facilities provision, as well as transport systems connecting to workplace opportunities (i.e. not locating new housing in poorly served locations just because it happens to be a brownfield windfall opportunity). A sophisticated balance sheet approach is required, of which affordable housing (howsoever defined) is only one part and the formula should recognise that other cost elements have to come from the development equation, such as infrastructure contributions (e.g. bridges, dock or canal walls), educational, open space, or leisure provision, as well as other benefits such as conservation (re-use of old buildings) or community regeneration elements.

#### **4. London's Economy**

4.1. **Employment** - There remains demand for logistics space, even when employment land is being lost to other uses. The opportunity is there for promoting waste recycling upon employment land so that London becomes a leader in processing and dealing with its waste.

#### **5. London's Response to Climate Change**

5.1. The Plan will need to show how the environmental constraints are to be dealt with and related to spatial strategies. This is not done currently where there a number of references to the Mayor 'expecting', 'encouraging' or 'promoting' measures to be introduced to combat climate change, but again with no mechanism to effect delivery. There are very real limitations upon the scope for introducing such measures in the urban context, but particularly in Inner London. Aside from the sites listed at Annex 1 it would be rare to find a location in London where it would be feasible to provide SUDS or even for grey water storage.

5.2. **Retrofitting** – Policy 5.4 urges planning authorities to identify opportunities for reducing carbon emissions from existing building stock, although this is going to be difficult to achieve via the development control process.

## 6. London's Transport

6.1. **Transport** – This matter is at the very heart of tackling London's survival, growth and prosperity. Building up intensity of activity can help the sustainability of city activity by increasing the efficacy of transport systems and buildings, particularly where they are of a mixed use nature, creating a spread of activity throughout the day and beyond traditional peaks. The ability to support new development and economic activity is dependent on the overall carrying capacity of its transport systems. This is relevant not just at nodes (where development is proposed) but also along the whole system and it is important to demonstrate and ensure that the overall functional capacity of the networks and public transport nodes can carry the totality of new development. This is particularly important as the Transport Plan identifies that much of the network is already at capacity even before major new development is added.

6.2. The transport proposals currently show a series of largely centre-periphery radial transport improvements which take limited account of the huge pent-up demand for orbital movement, most of it undertaken by car now and for the foreseeable future. The RTPI sees considerable scope to develop a stronger matrix or lattice network. If the Plan wants to promote the role of Outer London, transport connections need to consider schemes that strengthen orbital travel rather than merely extend journey distances and London's commuter influence even further than it already is. The objective of simply travelling further in a shorter time needs to be thought through. There is a risk that it will make London even more scattered than it is and so reinforce present inefficiencies and passenger discontent from travel delays, breakdowns and accidents.

6.3. The Mayor's continuing support in the Transport Strategy for Stratford as an international station and a stop for Eurostar services is welcomed by representatives of the Region working in East London. The Mayor is urged to advocate for High Speed Two to be directly linked to High Speed One and therefore the European high speed rail network. International railway services from the UK regions could then use Stratford International as their London stop to take on additional international passengers. In the longer term this would ensure a good international service at Stratford International and prevent placing further strain on the already over-heated West of London.

6.4. **Cycling** - The 5% shift to cycling is not considered to be ambitious, but there is no mechanism put forward to achieve even this.

**6.5. Areas requiring further coverage** - The issue of Heathrow is a rather schizophrenic one for the draft Plan. Aviation is not dealt with at all currently in the draft, other than a policy, Policy 6.6 resisting further growth at Heathrow (a decision not in the hands of the Mayor anyway). However, the key role played by the airport in attracting the financial sector growth that the Plan desires is also acknowledged. Similarly we note the uncertainty and lack of clear policy objectives for river crossings in East London, for instance there is no mention of any commitment to the East London River Crossing within the schedule of road projects at Table 6.3.

## **7. London's Living Places and Spaces**

**7.1. Place Shaping, Historic environment and landscapes, Protecting London's Open and Natural Environment** - We support the Mayor's broad vision, expressed in the Foreword, to make shared space safer, *'so that it is always pleasant to visit a park, and so that public transport is never threatening'* but there are also a number of other policy areas where we would like to see clarification and/or a firmer policy approach. The focus should also be on the quality of the environment for people. The population will probably have a high level of mobility and social and cultural diversity than in the past. There needs to be more emphasis upon building communities and encouraging households to remain. If the vision is to retain and enhance London's position as a World City, then it will need to have a world class environment to be able to attract and retain investment, a workforce and visitors. This might include for instance revisiting and upgrading designations such as Metropolitan Open Land. More analysis will be required of underlying socio-economic infrastructure needs (for schools, health care, etc.), rather than open-ended policies such as that at Policy 7.6 requiring architecture to be of high quality, which add nothing to the general stance in higher level documents such as PPS1.

**7.2. Tall buildings** - Increasing density and intensity of activity does not necessitate taller buildings in all cases. Increased density can usually be achieved in the range of 8-12 storeys without the need for the additional construction cost (for core and services) or increased street space to reduce overshadowing and overlooking. Generally mid height, higher density can provide more convivial public spaces with better microclimate. They also reflect London's European heritage /identity as opposed to an alien North American - Pacific one. As an illustration, the effective site utilisation and conviviality of Canary Wharf type approaches can be compared against more compact Broadgate type approaches. If it is decided to have a belt of acceptable locations for tall buildings, this should be cross-referred to where there is transport capacity. It may be found that the most appropriate locations currently lack capacity, thereby preventing progress until capacity can be expanded.

**12<sup>th</sup> January 2010**