

# RTPI response to Draft London Plan

*March 2018*

1. We welcome the opportunity to respond to the Draft London Plan (Draft Plan) consultation. The London Plan is important to our members as the most developed regional spatial strategy but also because it impacts beyond the boundary of the Greater London. That is why, as part of producing this response we have consulted with a wide range of our members in London, the South-East and the East of England.

## General comments on the Draft Plan

2. We support many aspects of the plan and especially its aspirational nature. We especially welcome the 'Good Growth' approach to planning for growth, focusing on health, quality of life, and reducing inequality. The RTPI firmly supports the idea that place-based approaches are crucial to tackling these issues, as described in our policy paper [Poverty, Place and Inequality](#).<sup>1</sup> RTPI research on the [Value of Planning](#)<sup>2</sup> has demonstrated the ability of planning to help meet these ends, and to deliver 'good growth'.
3. The rest of this response focuses mainly on some of the areas where we think the Draft Plan could be improved. Before responding to some of the individual chapters and policies of the Draft Plan, there are some more general issues we would like to raise.

## The purpose of the London Plan

4. The London Plan is intended to be a spatial development strategy for Greater London. As outlined in the Greater London Authority Act 1999 "The spatial development strategy must deal only with matters which are of strategic importance to Greater London".<sup>3</sup> The new Draft Plan is designed to bring "together the geographical and locational aspects of the Mayor's other strategies" (0.0.7). To provide "the strategic, London-wide policy context for borough local development plan documents" (0.0.9). And to be "read as a whole" (0.0.11), as one holistic document.
5. The new Draft Plan covers a wide range of issues and often takes an aspirational approach to solving some of London's most important issues. However, whilst we support this ambition, there has been concern that the Draft Plan gives insufficient focus to its main aims:
  - a. Lack of focus on the Draft Plan as a spatial development strategy: In many places more weight is given to detail and delivery issues than strategic spatial development issues.
  - b. Possible conflict with remit of local plans: the level of detail and some of the issues covered takes the Draft Plan into areas that might be more suitable for boroughs to deal with in their local plans. In places, this Draft Plan could be interpreted as 'local plan for

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<sup>1</sup> RTPI (2016), Poverty, Place and Inequality, [http://www.rtpi.org.uk/media/1811222/poverty\\_place\\_and\\_inequality.pdf](http://www.rtpi.org.uk/media/1811222/poverty_place_and_inequality.pdf)

<sup>2</sup> RTPI (2014), The Value of Planning, <http://www.rtpi.org.uk/knowledge/research/projects/value-of-planning/>

<sup>3</sup> PART VIII PLANNING The Mayor's spatial development strategy, The spatial development strategy (5)

London'. Introducing such one-size-fits-all policies is difficult, especially where it was not based on early and broad consultation with local authorities. It also does not allow for borough's to be locally distinctive in their approach to planning. The level of detail in the Draft Plan could lead to the necessity for more planning conditions on planning permissions, contrary to recent Government drives to reduce the need for them and speed up delivery.

- c. Issues outside the remit of the London Plan: There are policies in the Draft Plan which either sit outside what the RTPI sees as the scope of the Draft Plan, or may directly conflict with national policy. Examples of this are discussed later in this response, but include elements of fire safety (moving into remit of Building Control and Building Regulations), and green belt policy which as written conflicts with NPPF and the statements Housing White Paper that local authorities can conduct green belt reviews.
  - d. Could be more holistic: The length and detail of the Draft Plan make it difficult to consider it as one holistic document. The Government has asked for plans to be shorter, more concise and user friendly for all stakeholders. The Draft Plan contains conflicting policies which do not working jointly together and which may challenge delivery.
6. We welcome the ambition displayed in the Draft Plan and the desire to set out a plan for the growth of London. However, on balance, we believe the Draft Plan would benefit from being reframed within its strategic purpose. Considering it within this context would reduce the length and complexity of the Draft Plan, making it more accessible for all stakeholders. This would, for example, include:
- a. Removing content which is adequately covered in and/ or more appropriate to the Mayor's other strategies or boroughs' local plans. Avoiding repetition within the Draft Plan wherever possible. Ensuring key policy is within the policy boxes, and other text is tightened up. These changes would make it easier for readers to develop a holistic understanding of the plan.
  - b. Instead signposting to Supplementary Planning Guidance or Opportunity Area Frameworks; and other non- planning guidance or strategies
  - c. More focus on of the spatial implications of policies. RTPI's 2014 paper [Thinking Spatially](#)<sup>4</sup> sets out why spatial policymaking is so important to areas like economic growth, the environment, social wellbeing, and transport.
  - d. Making it clear that boroughs can bring forward policies in their local plans to achieve the aims of the London Plan in a way that takes into account local circumstances. The wording of the Plan should not prevent boroughs bringing forward progressive, locally-specific policy responses in future.
  - e. More consideration of strategic considerations with neighbouring authorities in the South-East and East of England. RTPI research on Strategic Planning found that cooperation across boundaries brings major benefits to all of the partners. Areas that were successful had a clear purpose, focused only on matters which required resolution across boundaries, took a spatial approach, worked collaboratively, and had strong leadership. Developing proper incentives is key to achieving strategic planning where the duty to cooperate has not been effective.<sup>5</sup> Although we understand the Mayor, GLA and TfL have no legal duty-to-cooperate with the neighbouring authorities some better

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<sup>4</sup> RTPI (2014), Thinking Spatially, [http://www.rtpi.org.uk/media/1004403/rtpi\\_thinking\\_spatially.pdf](http://www.rtpi.org.uk/media/1004403/rtpi_thinking_spatially.pdf)

<sup>5</sup> RTPI (2015), Strategic Planning: effective cooperation for planning across boundaries, <http://www.rtpi.org.uk/media/1230885/RTPI-Strategic%20Planning-Brochure%20FINAL%20web%20PDF.pdf>

guidance on how he will practically assist borough's in their duty would be welcomed. Specifically, we would welcome stronger direction from the Mayor on waste management.

## Capacity concerns

7. The Draft Plan is an aspirational document and asks a lot. Delivering the Mayor's vision of Good Growth will require significant investment in borough planning departments, specifically to deliver the requirements set out in policies such as additional monitoring, plan-led policies including masterplanning and design codes, and design analysis set out in Policy D2. The introduction of additional burdens should come with clear justifications of why they are necessary, and a clear explanation on how planners will be supported to take them on.
8. Our research on the [Value of Planning](#)<sup>6</sup> and [Fostering Growth](#)<sup>7</sup> provide evidence for the economic, environmental, and social benefits of such investment in planning. Far from being too costly or restrictive, the planning profession fosters growth by adding certainty and creating communities in which people and enterprise want to be based.
9. We invite the Mayor to talk to us about the various programmes we are running on increasing capacity in planning, including the [Apprenticeship in Town planning](#)<sup>8</sup>, [bursaries](#)<sup>9</sup>, and [Future Planners](#)<sup>10</sup> outreach to schools and colleges.
10. The plan introduces puts additional pressure on to the capitals infrastructure without sufficient explanation of how this will be delivered and funded. The Policy H2 Small Sites raises particular concerns in terms of infrastructure planning as the sites are expected to be windfalls, with ad hoc planning contributions.
11. A general point throughout this response is that the Mayor and GLA should make it clear exactly who it expects to do what, and how it will work with boroughs and other stakeholders to help them meet its ambitions. It is crucial to address delivery-, resourcing- and funding-concerns at an early stage as opposed to reviewing them at examination.

## Greater use of data

12. We welcome the areas where the Draft Plan recognises the value of data, for example in the Brownfield Registers or the London Development Database. However, we feel it could take a larger role in encouraging progress here. RTPI research on [Creating Economically Successful Places](#) identified better use of data as a crucial way to create successful places and good growth. A crucial first step is getting all the information online, however, planners, local government and developers can often do more to make these planning resources and strategies easier to understand and more engaging.<sup>11</sup>
13. The Mayor and the GLA could promote greater data use and sharing. In particular this might include producing guidance on standardising data collection, formats, and accessibility across boroughs, GLA and TfL. The Draft Plan seems disconnect from the

<sup>6</sup> RTPI (2014), The Value of Planning, <http://www.rtpi.org.uk/knowledge/research/projects/value-of-planning/>

<sup>7</sup> RTPI (2014), Fostering Growth, <http://rtpi.org.uk/media/1021083/RTPI-Fostering%20Growth-June%202014.pdf>

<sup>8</sup> <http://www.rtpi.org.uk/apprenticeships>

<sup>9</sup> <http://www.rtpi.org.uk/education-and-careers/engagement-and-outreach/bursaries-and-competitions/>

<sup>10</sup> <http://www.rtpi.org.uk/education-and-careers/engagement-and-outreach/>

<sup>11</sup> RTPI (2014), Creating Economically Successful Places, [www.rtpi.org.uk/media/1151912/rtpi\\_planning\\_horizons\\_4\\_creating\\_economically\\_successful\\_places\\_november\\_2014.pdf#page=36](http://www.rtpi.org.uk/media/1151912/rtpi_planning_horizons_4_creating_economically_successful_places_november_2014.pdf#page=36)

work the Mayor's Chief Digital Officer. It could also include plans for better data in key areas such as completions, monitoring, and waste. There also needs to be clarity on how people can access this data - taking it out of silos and standardising it where possible. The London Plan may not be the most appropriate place for such guidance, and a series of good practice guides might be better. However it should be a priority for the Mayor and the GLA, and the London Plan should be informed by the best data available going forward.

## Chapter 2 Spatial Development Patterns

### SD2: Collaboration on the Wider South East

14. The RTPI welcomes the plan's pledges for the Mayor and the GLA to work with the wider South-East (WSE) partners to find solutions to issues such as the environment and waste management. While the WSE is considered in parts of the Draft Plan, there could be more consideration of the importance of the South-East and its relationship to London. The Draft Plan makes omissions in how it considers the WSE. New growth areas like Milton Keynes, Luton and Essex are interrelated with London. There should be acknowledgement of them in the Draft Plan and how both can work together to harness Good Growth. Growth in WSE will affect London's transport infrastructure and could support and boost its economy.
15. It is also crucial to think about the role the South-East might play in delivering alternative arrangements if London is not able to meet its own needs in areas like waste management and housing. Although, the Mayor has no duty-to-cooperate powers, considering these issues is good planning and part of Good Growth. It should not be assumed that the WSE will pick up the burden in certain areas. If the Mayor and GLA consider this a possibility it should state this clearly and set out arrangements for working with its neighbours in the WSE.

## Chapter 3 Design

### General comments on Design

#### Level of detail

16. We are pleased to see linkages made between good planning and good design in this chapter. Whilst the content of the policies themselves make for excellent practice guidance, the level of detail is not appropriate for a strategic regional plan. There could be unintended operational difficulties through duplication of local authority design policies. Detailed design guidance can be useful. However it is more appropriate for Supplementary Planning Guidance or even Neighbourhood Plans, than the London Plan. A better approach for the London Plan would be to signpost to design guidance and focus on expressing general principles only.

#### Capacity to deliver design-led approach

17. While a design-led approach may ultimately be superior, it is likely to take longer, be more costly, requiring additional skills and resourcing at borough level. The Draft Plan should acknowledge this. A design-led site by site approach is labour intensive and our members have reported insufficient capacity at borough level to deliver this approach, as has the GLA's own analysis. The Mayor and GLA have reported that 91% of London Boroughs say they need more design, place shaping, urban design and architecture skills in their planning departments<sup>12</sup>. At

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<sup>12</sup> London's Place Shaping Capacity Survey, GLA (2014)

present the design policies do not set out adequately how it will address this issue.

18. Planners have shown they can regularly adapt to changes to planning processes and skill requirements. However, they should be given time, training, and support to access CPD opportunities. Budget and staff cuts have meant less space to develop new skills and less funding for CPD. We do not think the plan adequately communicates how the additional capacity needed to deliver this change will be resourced.

## **D2 Delivering good design**

19. The design review process detailed in D2 requires design reviews for tall or high density buildings, to be carried out by independent experts. While Design Review Panels (DRPs) can be valuable in some areas and contexts they may not be required in others, and may be inappropriate or unfeasible for some authorities to set up. Thus their creation should be for boroughs to decide.

## **D6 Optimising housing density**

20. The new Draft Plan's approach to housing location is based on a clear decision to prioritise increased density around transport hubs and town centres, whilst avoiding any development in the Green Belt. The approach to housing density focuses on a site-by-site, design led approach, guided by the site context, local infrastructure, and transport. In principle both of these are good principles for guiding housing development. Locating housing around transport hubs and town centres is generally a good idea - people need the infrastructure, and new residents support the town centres. However we have some concerns with aspects of the approach.
21. The 'site context' requirement may be used the block development in areas which need it. For example planning committees might claim that the character of the area does not support additional development, or high density development.
22. Developing around existing and planned transport infrastructure is sensible as a general rule. However the combination of ambitious housing targets and restrictions on development in the Green Belt might lead to excessive stress on this infrastructure. The move towards 'hyperdensity' in some areas will require careful planning and high quality skills. Measures will need to be in place to secure adequate physical and social infrastructure. In particular it is important not to overestimate the existing capacity of the bus network.
23. In previous London Plan's the Sustainable Residential Quality (SRQ) matrix provided upper and lower density limits based on public transport access, infrastructure and relationship to town centres. In many boroughs the density matrix has fallen out of use to the level where in some areas it is not functional. However, in some parts of London, particularly Outer London, the SRQ matrix is still found useful in achieving minimum densities where there are political pressures against them. There is also a risk that removing maximum densities could drive up land prices and challenge housing affordability. The plan needs to be clear that is promoting optimisation rather than maximisation.
24. Thus we suggest instead either retaining and reviewing the SRQ matrix, or keeping it in place until boroughs have developed alternative ways to ensure optimal densities. At a minimum this should include retaining minimum density standards, as recommended by the review conducted by LSE researchers in 2016.

## **D11 Fire safety**



25. We are concerned that the proposed policies on fire safety will lead to a lack of clarity on who is responsible for what in terms of Fire Safety. The preliminary draft of the Hackitt review of Building Regulations and Fire Safety, made it clear that building control have the main responsibility for fire safety during development management:

*“It is a general principle that planning should not seek to duplicate other regulatory regimes. In this context, fire safety considerations are not normally the subject of consideration at the planning application stage.”<sup>13</sup>*

26. The RTPI has also [published guidance](#) on the respective roles relating to fire safety in development management.<sup>14</sup> There was widespread agreement from the experts consulted in putting together this guidance that it is important to avoid blurring the boundaries of who is responsible for what. Furthermore, over many years, Government has repeatedly emphasised that consenting regimes (such as planning and building control), should avoid overlap wherever possible. The NPPF and NPPG both state that planning should assume other regimes operate effectively, and avoid introducing conditions for areas covered by other regimes.

## Chapter 4 Housing

### General comments on housing

#### Issues with intensification strategy

27. Elsewhere in the response we have raised issues with the Draft Plan's intensification strategy. There are particular concerns that such a strategy could lead to issues such as hyper-density. As we state in our policy paper '[Where we should build more housing](#)'<sup>15</sup>, our members do not generally believe that development within existing built up areas will not meet all our needs for housing and other development. Green Belt designation should be just one consideration when making decisions about sustainable locations for development.

#### H1 Increasing housing supply

28. We are concerned at how deliverable the housing targets detailed in the Draft Plan are. Whilst London clearly needs more affordable housing, it is questionable whether these targets can be achieved without further powers or resources.
29. We have two main concerns about the delivery of these targets:
- Lack of land supply: some councils are failing to meet their previous targets despite adopting a strong growth focus and doing significant work on intensification and identifying new supply. Now they are having their targets doubled in some cases. This problem is only compounded by the new restriction on Green Belt review. There will also be a strong time lag in bringing forward sites and meeting annual targets by 2019 is particularly unlikely.
  - Lack of resources in boroughs: as mentioned in various places in this response, the required changes will require a significant increase in the staff and resources available

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<sup>13</sup> Judith Hackitt (2018), 'Building a safer future. Independent review of Building Regulations and Fire Safety: interim report', [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/668831/Independent\\_Review\\_of\\_Building\\_Regulations\\_and\\_Fire\\_Safety\\_web\\_accessible.pdf#page=46](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/668831/Independent_Review_of_Building_Regulations_and_Fire_Safety_web_accessible.pdf#page=46)

<sup>14</sup> RTPI (2017), 'Responsibility for fire safety during the development application process in England', <http://bit.ly/RTPI-fire-safety-England>

<sup>15</sup> RTPI (2016), 'Where should we build more homes?', <http://bit.ly/rtpi-where-homes>

to boroughs, and there is insufficient attention to how this will be achieved in the Draft Plan.

### How could the targets be delivered?

30. The GLA is taking welcome steps to improving its capacity and processes for assembling land and using powers such as Compulsory Purchase Orders. We support the plans set out in the Draft Housing Strategy and 4.1.4 of this Draft Plan, for pro-active intervention in London's land market. We also support the GLA in its attempt to secure further powers from central Government to intervene. However it is important that housing delivery plans and targets are not based on securing these powers.
31. The RTPI is also encouraged to see support for more local authority housebuilding. While council-led delivery has stalled in recent decades, our new research with the National Planning Forum and UCL shows it is on the rise again, including in London boroughs.<sup>16</sup> Local authority housebuilding may also provide a way to ensure that affordable housing can be delivered from a range of sites including smaller and more difficult sites that the market may not want or be able to deliver. It may even help address resourcing issues, where revenues from local authority housebuilding can be used to employ planning and design staff. However if local authorities are going to play a larger role they will need support upfront to do this, both in terms of resources and powers. We welcome support for this in the Draft Plan but would like to see more detail on how it will be provided.
32. The RTPI has made a number of recommendations about how to deliver housing on a large scale.<sup>17</sup> These include providing public access to the best information on land ownership and use, local authorities taking a larger role in land assembly, linking together infrastructure spending with planning for housing, and providing incentives for local authorities to work collaboratively across borders. Again it is also worth emphasising the need for the Mayor to lobby Government to provide grant to support the delivery of affordable housing, especially social housing.
33. The RTPI accepts that there is no panacea which will enable these targets to be delivered, however other areas which might bring forward delivery include:
  - a. The brownfield land register
  - b. One Public Estate
  - c. Modular construction methods
  - d. Compiling and using better spatial data to identify potential sites

We welcome the fact the Draft Plan supports all of the above and the role they play in alleviating the pressures of the housing crisis.

## H2 Small sites

34. The RTPI supports the emphasis the Draft Plan puts on developing small sites for housing. We agree that small sites can assist in diversifying sources, location, type and mix of housing supply and open up additional sites for housing development. We agree with a presumption in favour of small sites, where they are planned properly with the supporting infrastructure required, and respect local character and heritage assets. We also welcome ambition in this area as we believe there is more potential for small-site delivery.

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<sup>16</sup> Janice Morphet and Ben Clifford (2017), Local authority direct provision of housing, RTPI & NPF <http://bit.ly/rtpi-council-building>

<sup>17</sup> RTPI (2013), Delivering Large Scale Housing, <http://rtpi.org.uk/media/630969/RTPI%20large%20scale%20housing%20report.pdf>

35. However, we are concerned that the high targets specified may be overpromising. Many more small sites would need to be identified and brought forward and there is no clear evidence this is feasible. The GLA may feel that setting an ambitious target and supporting it with the small sites policy will bring new sites forward. However in many areas there has already been a significant amount of work aimed at trying to bring these sites forward. It is not safe to rely on a far greater number of homeowners and small landowners being willing to sell their land or subdivide their properties. This is particularly the case given that the target period begins in 2019, which is very soon considering it would require a major shift in approach. Local authorities need clarity on what consequences may arise from failure to meet the targets.
36. This is especially important since the policy could put additional burden on planners, due to an increased number of applications and the need to produce area based Design Codes. If capacity is not available within boroughs, there will be a need to procure these skills from consultants. This will have financial implications for planning departments whose budgets are being cut. These Design Codes will take time to produce and will not be ready for 2019 when the policy is due to start. It will also be important to ensure the drive for large numbers of small sites does not lead to an increase in housing that does not comply with standards for example around space and daylight.
37. And finally we are concerned about the potential impact delivering the small sites target will have on infrastructure planning and delivery. If over a third of units are meant to be delivered from small sites, such an uplift may impact the infrastructure capacity. There is lack of understanding in Policy H2 about how this will be planned. The approach to infrastructure delivery will vary from borough to borough based on CIL rates and whether or not boroughs have been able to justify small sites affordable housing contributions. The Mayor and GLA should set out how they will provide infrastructure funding to support such an uplift in small housing site provision.

#### **Community-led, self-build and custom build:**

38. We welcome the support expressed for each of these housing products in the small sites policy, but they could play a larger role. Larger sites can be prepared then sold on to self-builders. In some cases groups of individuals can group together to build larger projects. The RTPI is supporting the Right to Build Taskforce<sup>18</sup>, which was established to help Local Authorities, community groups and other organisations across the UK deliver large, affordable custom and self-build projects. We recognise and welcome plans for the Homes for Londoners Community Housing Hub<sup>19</sup>, but would like to see more on community-led housing in the plan. The RTPI will also be exploring what role planning might play in supporting community-led housing.

#### **H6 Threshold approach to applications**

39. We welcome the focus on affordable housing delivery. We believe as institute providing affordable housing is important part of creating sustainable communities. We consider that the threshold approach to viability is clear and provides certainty to the affordable housing viability process both for boroughs and for developers. The threshold approach also requires fewer resources from boroughs.
40. We also welcome the recognition in the threshold approach that developer contributions can only go so far in delivering genuinely affordable housing and that grant for affordable housing will be required. We support the Mayor and GLA approach that if a developer provides 35% affordable housing without grant that he will then, where possible, provide the

<sup>18</sup> <http://righttobuildtoolkit.org.uk/right-to-build-task-force>

<sup>19</sup> [www.london.gov.uk/press-releases/mayoral/sadiq-sets-out-plans-for-community-led-housing](http://www.london.gov.uk/press-releases/mayoral/sadiq-sets-out-plans-for-community-led-housing)



extra 15% via grant. We would also support the Mayor in lobbying government for additional grant for affordable housing. Reliance on developer contributions for affordable housing is not a sensible path to solving the housing crisis. Even if the total level of developer contributions increases it is likely still be insufficient to both provide sufficient affordable housing and mitigate the impacts of development.

## Chapter 6 Economy

### General comments on Economy

41. Whilst we welcome much of this chapter, we consider it could be improved. We would propose that there are further details on how the Mayor and the GLA will support outer London to reach its economic potential to ensure that London continues to be a sustainable polycentric city. Focus on the Central Activity Zone is important, but not at the cost of not realising the growth potential in other parts of the city.

### E1 Offices

42. There has been a huge release of employment land across London in recent years. Between 2010-15 industrial land was released almost three times the rate recommended in the SPG, and in 2015 there was “approximately 83,227m<sup>2</sup> of office floor space in designated industrial areas in London with prior approval for office to residential conversion”.<sup>20</sup> Thus we welcome the support for using Article 4 Directions to remove permitted development rights to allow the conversion of employment sites to residential without planning permission. However, we do not consider that such support needs to be stipulated within the Draft Plan as boroughs are already able to use these powers without it being a policy within the Draft London Plan. To avoid repeating national policy, we consider that these references could be deleted, to reduce the length and replication in the Draft Plan

### E9: Retail, markets and hot food takeaways

43. Our Planning Horizons paper on Promoting Healthy Cities considers how planning can promote healthy lifestyles, including in relation to food.<sup>21</sup> It considers many of the same areas that we are glad to see promoted in this plan, including active transport and green infrastructure. Thus the RTPI thinks a strategic plan should play a role in promoting healthy lifestyles.
44. However, we do not think that a blanket rule banning takeaways near schools is appropriate for a regional strategic spatial plan. The Use Class designation (A5) is a land use designation. It does not reflect the healthiness of the food that is served. The principle of tarring all businesses within this use class with the same brush seems an arbitrary approach to regulate what is effectively food standards, which a licensing system would be better placed to do. At the very least the principle of the healthiness of food being a material consideration in the planning process could lead to delay in delivery and potentially very complicated conditions on development, which, as we have said earlier, is contrary to the aims of speeding up delivery.

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<sup>20</sup> AECOM (2015), Industrial Land and Supply,

[https://www.london.gov.uk/sites/default/files/industrial\\_land\\_supply\\_and\\_economy2015.pdf](https://www.london.gov.uk/sites/default/files/industrial_land_supply_and_economy2015.pdf)

<sup>21</sup> RTPI (2014), ‘Promoting Healthy Cities: why planning is critical to a healthy urban future’, Planning Horizons Vol. 3, RTPI,

[http://rtpi.org.uk/media/1119674/rtpi\\_promoting\\_healthy\\_cities.pdf](http://rtpi.org.uk/media/1119674/rtpi_promoting_healthy_cities.pdf)

# Chapter 8 Green Infrastructure and Natural Environment

## G2 London's Green Belt

45. We strongly support enhancements to the Green Belt to provide appropriate multi-functional uses for Londoners. Green Belt is an urban containment tool and not an environmental designation but that does not mean that it cannot be invested in to provide environmental enhancements. Too often parts of the Green Belt are argued to be expendable because they are in poor condition. If particular parts of the Green Belt are not considered to be in good condition, this is not necessarily a reason to de-designate them. Instead it can often be a reason to invest in them. The Natural Capital Commission found planting trees on the fringes of cities to be amongst the most economically efficient projects.<sup>22</sup>
46. However, the RTPI is concerned with policy G2 and GG2(C) supporting extension of the Green belt but not allowing de-designation. As we state in our policy paper '[Where we should build more housing](#)', land within existing built up areas will not meet all our needs and Green Belt designation should be just one consideration when making decisions about development. The experience of our members clearly indicates that housing can be built in the Green Belt without undermining the priority to be given to brownfield sites. *If it is done through a planned, managed and phased approach to development.*<sup>23</sup> Furthermore this policy may be in conflict with national guidance, which gives local planning authorities responsibility for reviewing Green Belt Boundaries through Local Plans, and advises not including land "which it is unnecessary to keep permanently open".
47. A managed approach to urban expansion, whilst avoiding urban sprawl around our major cities, has been successfully achieved through planning policies such as Green Belt. The planning profession has championed this policy for over 60 years. But it is important to revisit the purposes that Green Belt need to fulfil over the coming generation. The value of Green Belts is not simply about what is ugly and what is attractive, as some argue. Indeed, the name 'Green Belt' itself may be a part of the problem - neither in reality or in planning policy is the Green Belt the rural vision conjured by the name.
48. We need to talk about who green belts are for, and about their social impact, along with their continued role in shaping and managing urban growth. Green Belt boundaries may well need to change, but only through careful reviews over wider areas than single local authorities, and where safeguards are put in place to ensure that development is sustainable, affordable and delivered in a timely manner, and without prejudice to the renewal of brownfield land.
49. We believe the best solution would be for the GLA to spearhead a review of the whole London Green Belt, in order to take a strategic overview. The [Outer London Commission](#) made similar conclusions in 2016, arguing that the Mayor should coordinate the reviews of local authorities, including by providing "consistent methodology/principles to coordinate and provide a strategic dimension to boroughs' local Green Belt reviews".<sup>24</sup> Even if it does not provide this, the London Plan should certainly not block individual local authorities who

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<sup>22</sup> Natural Capital Committee, 'The State of Natural Capital', Third report the Economic Affairs Committee.

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/516725/ncc-state-natural-capital-third-report.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/516725/ncc-state-natural-capital-third-report.pdf)

<sup>23</sup> RTPI (2016), Where should we build more homes?, <http://bit.ly/rtpi-where-homes>

<sup>24</sup> Outer London Commission (2016), Accommodating Growth, <http://bit.ly/olc-accommodating-growth>

are willing to conduct their own reviews alone or in collaboration with neighbouring authorities. Especially given the ambitious housing targets outlined in the plan, and concerns about meeting them, it seems unjustified to rule out Green Belt development. Not all Green Belt meets the purposes set out in national planning policy. Even where land does fulfil these objectives, it is not Green Belt should automatically be set above all other considerations in achieving sustainable development.

## Chapter 9 Sustainable Infrastructure

### SI8 Waste capacity and net waste self sufficiency

50. Waste infrastructure is a vital element of a successful city and waste policy is a crucial element of planning. It is important that the London Plan identifies and takes strategic decisions about waste which cannot be done at a borough level. This includes a strategy for hazardous waste and CD&E waste arising from large scale infrastructure projects, such as Thames Tideway Tunnel, HS2 and Crossrail projects. The Draft Plan is silent on these issues, but it is not clear where else a strategy for these waste streams would be more appropriate.
51. We support the aim for net self-sufficiency for all waste streams in SI8.
52. There are a number of barriers to developing new waste facilities in London, including high land prices and constrained sites. We are concerned that the draft waste policy SI8D adds a further barrier by assessing new waste sites against their ability to provide jobs. Waste facilities vary in the number of jobs they create, depending on their size and complexity. But importantly, waste facilities have a different role to play than other industrial uses in that they provide essential infrastructure. We do not think that job creation should be part of the evaluation process for the suitability of essential infrastructure like waste facilities because it could prevent delivery of those facilities.
53. One weakness of the aim for net self-sufficiency is a failure to adequately outline how boroughs should work together to deal with waste (para 9.8.7). The Draft Plan proposes that boroughs who cannot identify sufficient capacity or the required land to meet their apportionment targets should negotiate the transfer of apportioned waste. However, in reality neighbouring authorities are unlikely to want to take on any additional responsibility for waste. Therefore there needs to be a clear process and set of incentives to cooperate (or penalties for not cooperating). This could include the Mayor and the GLA brokering a deal between boroughs, or the Mayor making a decision for boroughs if they aren't able to work together. An alternative option is a pan-London strategy.
54. It is also important that the strategic plan for London's waste is considered with the WSE context in mind. As with housing targets, it could be argued there is a risk that if net self-sufficiency is not achieved, the WSE will be expected to pick up the slack. The London Plan should be explicit about the role of the wider South East in managing London's waste.

## Chapter 10 Transport

### General comments on transport

55. We have made a number of recommendations about transport infrastructure investment and the benefits it can bring, particularly if joined up with housing policies and strategies.<sup>25</sup>

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<sup>25</sup> RTPI (2014), Transport Infrastructure Investment, <http://rtpi.org.uk/knowledge/policy/policy-papers/transport-infrastructure-investment/>

The Draft Plan is strong on several of these, including delivering a visionary narrative of the benefits and integrating transport infrastructure schemes with wider policy priorities.

### **The importance of Outer London**

56. The Mayor's Transport Strategy and Draft Plan are often concerned with getting people in and out of Central London. However, it is also important to enable people to work near where they live, for example through mixed developments, and greater amounts of orbital public transport.
57. New housing targets are putting a lot of pressure on outer London boroughs. Intensification on the scale being proposed will put extreme stress on the bus network, which cannot be solved without serious investment in and support for the bus network. This might for example include introducing more bus only lanes. If these targets are to be pursued, additional infrastructure like extensions to tube lines, increased Overground Network, Crossrail 2, trams and cycle highway improvements will also need to be considered. If Crossrail 2 cannot get the required funding from Government, there needs to be consideration of an alternative strategy as much of the growth is reliant on delivering this new service. Also much of the infrastructure contributions being collected are expected to go towards Crossrail 2, if this does not go ahead, consideration will need to be given to how Mayoral CIL will be spent. Many of these boroughs want to accommodate growth, but know it may not be sustainable given current transport infrastructure.

### **Making better use of transport data**

58. Given the amount of data being recorded about people's travel habits, we would like to see a greater commitment to using this data to develop transport plans.

## **Chapter 11 Funding the London Plan**

### **The Funding Gap**

59. £1.3 trillion of spending is required for the infrastructure needed to deliver the Draft Plan.<sup>26</sup> The Draft Plan states that "the total gap between required public sector investment and committed funds was estimated to be around £3.1 billion per annum". The Draft Plan calls for "clarity from Government on the availability of investment for much-needed infrastructure in the capital, and more fundamentally... further devolution of fiscal powers in line with the recommendations of the London Finance Commission". The RTPI supports this call for necessary Government investment, however believe the heavy reliance of the plan on this as-yet non-committed funding to be a major weakness of the Draft Plan.

### **Infrastructure**

60. We support the GLA and London boroughs taking a more pro-active role in land assembly, including through use of existing powers of compulsory purchase, as recommended in our research on Large Scale Housing Delivery.<sup>27</sup> We also support the Mayor in making the case to Government that more funding and powers are required to deliver the affordable housing we need. More funding is needed for investment in homebuilding and enabling infrastructure. We agree the Government should be lobbied for "reforms of, and resources to support, compulsory purchase".

<sup>26</sup> London Infrastructure Plan GLA 2015

<sup>27</sup> RTPI (2013), Delivering large scale housing,

<http://rtpi.org.uk/media/630969/RTPI%20large%20scale%20housing%20report.pdf>

## Potential options for raising the required funding

61. We support the Draft Plan's calls for further devolution of fiscal powers in line with the recommendations of the London Finance Commission<sup>28</sup>. The RTPI has long supported such devolution, for example in our 2014 Planning Horizons paper on [Making Better Decisions for Places](#)<sup>29</sup>. It can enable a more place-based approach to policy-making, allowing local leaders to shape places, and manage, coordinate, and integrate services, infrastructures and policies.
62. We agree with the general message behind 'Sharing in Land Value Uplift' - it should not be users alone who fund infrastructure projects. Instead others who benefit from them should contribute, especially landowners whose land becomes more valuable. We also agree with the suggested approach of trialling a Development Rights Auction Model on a major infrastructure project in London. Our research on [Planning as a Market Maker](#)<sup>30</sup> has considered the impacts of similar models in other European countries.
63. The Mayor and GLA should continue to consider Tax Increment Financing (TIF). TIF is a way of borrowing against future tax revenue to fund infrastructure upfront. It allows local (or regional) government to fund improvements by borrowing against future business rates income that should be created by the regeneration and development. TIF was used to fund the Northern Line extension.<sup>31</sup> [This review](#) from the Scottish Futures Trust covers pilot schemes in Scotland.<sup>32</sup>

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<sup>28</sup> London Finance Commission (2017), 'Devolution: a capital idea', [https://www.london.gov.uk/sites/default/files/devolution - a capital idea lfc 2017.pdf](https://www.london.gov.uk/sites/default/files/devolution_-_a_capital_idea_lfc_2017.pdf) '

<sup>29</sup> RTPI (2014), Making better decisions for places, <http://bit.ly/rtpi-better-decisions>

<sup>30</sup> RTPI (2015), Planning as a Market Maker, <http://bit.ly/planning-market-maker>

<sup>31</sup> Placemaking Resource (2014) <https://www.placemakingresource.com/article/1325425/case-study-using-tax-increment-financing-fund-northern-line-extension>

<sup>32</sup> Scottish Futures Trust (2013), 'Tax incremental financing: a review of approach to date' [https://www.scottishfuturestrust.org.uk/storage/uploads/Tax\\_Incremental\\_Financing\\_-\\_Review\\_of\\_Approach.pdf](https://www.scottishfuturestrust.org.uk/storage/uploads/Tax_Incremental_Financing_-_Review_of_Approach.pdf)