

A New Plan for London – Proposals Document

Consultation Response by Nicky Gavron AM on behalf of the London Assembly Labour Group

1. Introduction and context

- 1.1 We are pleased that the outline proposals take the existing London Plan, including the revisions published in February 2008, as the basis for the new plan. We also strongly support the intention of integrating the new spatial plan with the revisions to the Transport, Housing and Economic Development Strategies.
- 1.2 We would stress the need to integrate all these strategies with the Climate Change Mitigation and Energy strategy, and the Climate Change Adaptation strategy.
- 1.3 We have adopted a two-level approach. We start with an overarching critique of the proposals including an alternative way forward, not just for London but also for London's wider role in the UK and internationally. This is followed by more detailed comments on the specific proposals.

General comments

- 1.4 Our major concern is that despite admirable sentiments about environmental sustainability being at the heart of the new London Plan and of the Economic Development and Transport strategies, the mayor's proposals are inadequate. The proposals do not represent new thinking or give the clarity of direction needed at this critical time. The original plan document, in 2001, signalled a major leap forward, setting out a whole, integrated policy framework creating an exemplary sustainable city based on three major ideas:
 - To accommodate London's projected population and employment growth within the London boundary in a more compact urban form.
 - To achieve this by linking mixed-use, mixed-tenure and higher density development together with social infrastructure and a new and extended public transport system
 - To address the historic inequality in wealth, opportunity and quality of life between east and parts of inner London and the rest of Greater London.
- 1.5 The Mayor is going backwards on these three big ideas. In particular, his policies for affordable housing cannot meet housing needs or produce the mixed communities London needs for a sustainable society. In respect of transport, the Mayor has abandoned a series of public transport projects intended to benefit east London and the suburbs and has no new projects in the

pipeline. This is a significant omission as planning London's jobs and homes for the future is predicated on sustainable transport policies and projects. It is the Mayor's job to make the case for major new public transport initiatives and to offer a credible choice and alternatives to the car.

- 1.6 The concern is that if current trends continue, there could be more car journeys in 2020 than now, and the inequality between the East Thames Gateway and the rest will have got worse not better and more Londoners will be without a decent, affordable home.
- 1.7 This is not the time for London's mayor to go for timid, backsliding policies. Given the global crisis of economic, climate and energy security, what is needed now is at least as great an advance in thinking as was set in motion in 2001 in "Towards a London Plan". The mayor's proposals do not constitute that sort of significant advance on the existing plan at a time when clear and vigorous political leadership is urgently needed. There are three issues that must be addressed coherently: The mayor must affirm London's leading role in tackling climate change. He must meet the challenges and opportunities of the global economic recession. He must address London's serious inequalities.
- 1.8 It is a matter of regret that what the mayor has produced is, in effect, a "London Plan lite". This is exactly what London does not need for this key watershed decade. The new London Plan looks forward to 2031. But the Plan will only 'live' for the next ten years before being replaced, and it is in this coming decade that vital decisions and actions must be taken to ensure a better future for London.
- 1.9 The context for the new London Plan is stark. It is the paradox of our time that we are the first generation in human history with the technologies, knowledge and information skills to halt climate change. But we are the last generation that can do anything about it. This next decade is critical. We have a heavy responsibility. Unless there are significant reductions in global greenhouse gas emissions, all the evidence suggests we will reach the "tipping point" beyond which runaway climate change becomes inevitable around 2015 or 2016.
- 1.10 At the same time, the global economic recession is seriously damaging the ability of cities world-wide to deal with their environmental, social and economic problems.
- 1.11 It was timely that in 2005 the previous administration initiated and led the C40 Large Cities Climate Leadership Group. The C40 shares good ideas and best practices, and promotes international collaboration to accelerate the introduction of renewable energy and low carbon technologies. It does so through a combination of policy, procurement and political influence. This is something the Mayor does not capture in 'A New Plan for London', or in other related policy documents, none of which utilise best practice examples from other UK or global cities. In contrast, New York's 2007 spatial development plan, 'PlaNYC' learned from the original London Plan and its revisions but has since increased its focus on sustainability and delivering measurable change, demonstrated in its recent 2009 Progress Report.

- 1.12 Throughout its history London has shown itself highly adaptable to changes in global markets and able to respond to new pressures and opportunities. This is precisely the opportunity that addressing climate change provides in the context of the world recession. London will rise to the global competitive challenge if given the vision and the political impetus to respond at all levels and in all sectors of its economy. That is the leadership the Mayor must give.

A Comprehensive Vision

- 1.13 How we see the future determines how we act now. The London Plan and the other mayoral strategies have a key role in framing the perceptions of the future that we aim towards, and securing a consensus among Londoners and key stakeholders for that future. In London's case, this "vision" has a statutory foundation.
- 1.14 The vision for London's future stems from the goal of sustainable development spelled out in the GLA's three principal purposes as set out in the GLA Acts, namely, promoting:
- a) economic development and wealth creation in Greater London;
 - b) social development in Greater London; and
 - c) the improvement of the environment in Greater London.
- 1.15 These are to be balanced over time and implemented through a series of integrated strategies, including the London Plan, which brings together the spatial dimensions of all the others.
- 1.16 The 2007 GLA Act gave the Mayor and Assembly a specific duty to address climate change.
- 1.17 The Mayor's proposed vision does not take on board that tackling climate change, economic and social inequalities must all be part of an integrated package.
- 1.18 The starting point, set by the previous administration is the ambitious target of cutting London's greenhouse gas emissions by 60% from 1990 levels by 2025. The scale of the challenge this target sets needs to be put in perspective. Best estimates are that – excluding aviation – London is currently emitting slightly under 50 million tonnes of CO₂ equivalents per year. 60% of 1990 levels mean reducing to around 18 million tonnes per year. This is in the context of the world economic recession which has slowed the London economy, raising unemployment, widening inequalities, and increasing child poverty.
- 1.19 Tackling these issues together through the alignment of all the mayor's strategies, and especially the London Plan, needs radical thinking.

Sustainable development and tackling inequalities

- 1.20 Perceptions must change. Cutting our impact on climate is seen as a cost epitomised by how much economic cost are we prepared to exchange for environmental improvements?
- 1.21 What we need is a “benefit-benefit” solution that enables environmental benefits to sustain, grow and diversify the London economy rather than place a burden upon it - what has been described as sustainable development, or, as “climate prosperity” in the USA.
- 1.22 It is this concept which is helping to shape the policies of the Obama administration and of state and local governments, with detailed strategies emerging for Silicon Valley and Delaware. It is also now being adopted by cities in China and Brazil. Climate prosperity enables the twin goals of economic expansion and environmental stewardship to go hand in hand with the evolution of an advanced technological economy.
- 1.23 This approach provides the coherence for substantial economic and employment growth and sustainable business and community development. Innovation, efficiency and conservation in the use and reuse of all resources increases jobs, incomes, productivity and competitiveness, while tackling inequality and improving quality of life. The process involves the support of emerging green industries and the job opportunities that will come with them. But, more fundamentally, it should promote the greening every job and business in London’s economy. Critical will be how London’s highly sophisticated finance and business services can re-align to focus on carbon trading and on promoting world investment in green technologies. But it also means looking at the whole range of research, service, manufacturing and distributive activities in London and how they can contribute to sustainable development, more diverse employment and tackle inequalities.
- 1.24 Lord Stern has pointed out that tackling climate change now will save businesses and households money through enhanced energy and resource efficiency, and it will protect the sustainable growth of the economy through innovation and clean technologies. Set out below are the key elements of a green London economy of the future and the paradigm shift from the carbon-based economy of the last 200 years to an advanced resource efficient economy.
- 1.25 **Green Savings** – key to the successful adoption of sustainability is evidence that it saves people money. Sustainability and resource efficiency must be shown to cut costs, reduces waste and save money for individuals, families and businesses. Green savings increases disposable income for producers and consumers, providing an immediate payback and money that can be spent on other priorities.
- 1.26 **Green Opportunities** – sustainability and resource efficiency create business and growth. Examples of the kind of businesses and jobs needed to service

the demand for green savings include energy auditing and advice, retrofitting three million London homes, creating district heating, power and cooling systems and refuelling infrastructure for low carbon vehicles and renewable energy production. London has the track record in innovation, specialism and diversity to take on this challenge and lead the world.

- 1.27 **Green Skills.** This scaling up of demand for these and other manufacturing, distribution, and service activities translates into job creation and requires a wide spectrum of skills. These are across traditional trades and professions and include design, installation, commissioning, maintenance and inspection around buildings and energy or transport systems together with financial and legal specialisms. Resources efficiency and sustainability develops the entrepreneurial and employment skills that will be increasingly in demand in the 21st century.

Sustainable communities

- 1.28 Fairness and inclusion are sustainability issues just as much as London's burgeoning ecological footprint. New businesses and jobs and greater diversity of opportunity will help make London a more equal and inclusive place. This is particularly important for inner and East London, but also London's suburbs, where London and local government need to work together to enable communities to create their own solutions to greening their neighbourhoods.
- 1.29 These will include local Combined Cooling Heating and Power (CCHP) schemes, initiatives for water conservation and waste management, creating and protecting green spaces, urban agriculture and many more community-based business and job opportunities.

The Big Picture

- 1.30 On the wider scale, adopting the comprehensive "climate prosperity" framework provides the flexibility and resilience for London to respond and work with government – nationally and internationally – on framing and then implementing the wide range of legislation anticipated following the Copenhagen post-2012 Framework Agreement on Climate Change.

Conclusion

- 1.31 The myth that improving the environment and addressing social equity must inevitably be traded off against economic prosperity needs to be firmly laid to rest. Indeed, the opposite is true. A good environment is good economics. London will become wealthier and more equitable by using and reusing its natural and human resources much more efficiently. The vision of sustainable growth should be the centrepiece of the London Plan and the focus of all the other mayoral strategies.
- 1.32 Every objective, every policy, every strategy the mayor produces must answer the following questions:

1. How does it move London towards achieving the 60% CO2 reduction target?
 2. How many new jobs will be created?
 3. How would different groups and places benefit?
 4. How is the initiative cross-referenced to other objectives, policies and strategies?
 5. How is it reflected in the GLA budget process?
- 1.33 We need to be taking a lead from the U.K. government and employ a carbon as well as a financial budget for every policy initiative.
- 1.34 We also must anticipate and help to drive the conveyor belt of legislation on energy efficiency, energy supply, cap and trade for utilities and higher efficiency standards for buildings that will come forward in the near future.

2. Detailed comments

- 2.1 In this response we broadly follow the structure of the proposals document and we identify the main issues of contention. We do not answer the Mayor's specific questions.
- 2.2 When the draft Plan is published and we move towards the EiP, we will take an increasingly fine-grain approach, analysing the effects of individual policies and promoting alternatives that better achieve a low-carbon London and the climate prosperity goals of sustainability, equality and inclusion.

Critique of the Mayor's Vision

- 2.3 The Mayor's vision is not based on the GLA's principal purposes, which set the goal of sustainable development. Nor does it emphasise the target of 60% CO2 reduction by 2025, which the Mayor has accepted. The Foreword to the Mayor's 'A New Plan for London', the draft Transport Strategy, and Economic Development Strategy all seek to integrate sustainable growth and tackling climate change:

- "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, 'A New Plan for London')

It is a matter of regret that this strong statement not carried through in either 'A New Plan for London' or the other strategies.

- 2.4 As a consequence, the London Plan will not give a sufficient steer to the London Boroughs and other stakeholders on meeting climate change targets. This is a lost opportunity and will lead to confusion and even legal challenge. (The East of England Plan has been subject to a legal challenge and a Review, albeit on the subject of housing policy.)
- 2.5 Reference should be made to the critical interface with EU and national policy, recent legislative changes and anticipated future legislation (e.g. carbon pricing regimes).

3. Chapter one – planning for a changing London

- 3.1 It is a significant omission that the arguments advanced for revising the London Plan (paras 11-13) do not mention the elephant in the room – climate change and the imperative it imposes for the next critical decade and beyond.
- 3.2 All planning starts by looking at the evidence and key trends. However, it is essential to assess how robust trends are and how far the plan should seek to accommodate or to change trends.
- 3.3 The GLA population projections have a good track record of accuracy but factors change them over time. Changes in demographic and household composition (e.g. more young people and more elderly) must be matched by investment in social and community infrastructure – for example schools, hospitals and meeting places. The new priorities of providing environmental infrastructure such as district Combined Cooling Heat and Power (CCHP), water recycling and waste management facilities should be stressed.
- 3.4 Employment projections are more problematic for a number of reasons:
 - (a) Changes in the relationship between London’s GDP growth and levels of employment from 2000 onwards.
 - (b) The long-term effects of the current world recession on London’s business and financial services and other sectors.
 - (c) Employment implications of greening the London economy and promoting the environmental industries need to be calculated.
- 3.5 This fundamentally changes the business model for the whole London economy and the pattern of demand for employment land. The assumption in the proposals that we are dealing with a cyclical employment blip due to the world recession and London will return to “business as usual” must be questioned. Significant employment growth in the next 10 to 15 years is unlikely without a positive strategy to promote the new green sectors, and more emphasis on other sectors.
- 3.6 Poverty associated with unemployment and low skill levels and especially the shocking levels of child poverty must be a priority for the Mayor, with the

major strategies and the London Plan representing a co-ordinated attack on poverty in London.

- 3.7 The Mayor's approach to planning is set out in Para 59. There is a strong case for consensual working with all the agencies with a role in planning London's future and with adjacent regions. However, the consensual approach should not result in the lowest common denominator. The Mayor's job is to give positive direction or leadership and to coordinate efforts and agencies. There has never been a stronger reason for being strategic and proactive than the threat of climate change.
- 3.8 The Mayor's objectives need to make a strategic statement of the Plan's sustainability aims.
- 3.9 Objective 1 - meeting the challenges of economic and population growth - needs to spell out the paradigm shift to sustainable growth. Much of the growth in London's wealth and incomes over the past few years has been deeply *unsustainable*, carrying with it a large increase in carbon-based consumption and rising inequality, as acknowledged at paragraphs 39-45 of the Mayors proposals. A change in the structure of employment is implicit in addressing climate change.
- 3.10 The impacts of climate change are likely to fall disproportionately on the most deprived. As London's head-count rises, sustainability means finding ways of achieving a fairer distribution of the benefit, while adapting to climate change.
- 3.11 Taking these factors into account, the objectives should be recast on the following lines:
1. A city leading the world in reducing its impact on climate change.
 2. A city accommodating population growth and economic change equitably in sustainable patterns of development, linked to mixed use and mixed income/tenure communities with investment in public transport, social and environmental infrastructure.
 3. An internationally competitive city, with a strong and diverse economy, and a spectrum of employment, in central, inner and outer locations.
 4. A polycentric city of strong, secure and accessible neighbourhoods, providing all Londoners with opportunities to realise their potential, a high quality of life and more self-sufficient in terms of energy and services.
 5. A city where it is safe and convenient to access jobs, opportunities and facilities by the most energy efficient means - including walking, cycling and by water.
 6. A beautiful city, taking care of its buildings and built heritage, and improving its streets, open spaces and particularly, public realm.

4. Chapter Two – London’s Places

- 4.1 The proposals for London looking beyond its boundaries are supported. Greater London is part of a functional city region of 20 million people, with close relationships with towns and cities in the wider South East. Public transport investment, housing provision, economic development and issues such as local food production, waste, energy and water are all intrinsically linked across the London border. Co-ordination via the Inter-Regional Forum needs to be strengthened with vision and objectives more closely harmonised, and more resources devoted to technical co-ordination.
- 4.2 The London Plan should lead on new initiatives and ensure all relevant stakeholders are involved in reaching agreement on a common agenda.

On the wider canvas, London’s role in setting up the C40 Large Cities Climate Group must be built on as a matter of urgency (see general comments).

Switching to the treatment of the sub-regions and the Outer London Suburbs we have the following comments:

Sub-Regions

- 4.3 We welcome the redrawing of sub-regions, and in particular the reuniting of Boroughs on both sides of the River in East London. The treatment of the Central Area remains an important matter and we await further detail on how this will be handled, resolving for example the tension between special treatment of the Central Business Districts and the need to link that development to the regeneration and other needs of adjoining areas of Inner London. The first version of the Mayor’s Draft London Plan needs to say far more about the importance of and treatment of sub-regions, and the appropriate role of the London Plan in defining their priorities. In particular, the thinking on the Thames Gateway, a continuing Regional and National priority needs to be clearly set out.

Outer London Suburbs

- 4.4 There is a need for serious thought, consultation and consideration of policy options for London's Outer London suburbs. Demographic and economic change, challenges of housing supply, the growing problem of traffic congestion, questions about the future of suburban town centres, former or underused employment sites and provision for new green economic activities, together with the relationship between outer London's suburbs and the metropolitan fringe all point towards a need to refresh our thinking and create a policy vision for the outer suburbs. This should be done under the leadership of the Mayor. But it is becoming increasingly apparent that the Mayor's option is one of 'laissez-faire' and a failure of leadership. We await more detailed proposals but fear, judging from the interim conclusions of the OLC, that there will be few.

- 4.5 In outer London in particular, there needs to be much greater provision for the new green economic activities associated with climate prosperity.
- 4.6 The review of the hierarchy of town centres to clarify their respective roles is supported. Reconsideration of the provision of car parking in town centres is unsustainable. More realistically, the Mayor should campaign to secure a level playing field with out-of-centre retail. This should be associated with much improved public transport links between town centres, especially in outer London, and better facilities for walking and cycling. There is scope here for looking at the protection and promotion of district and neighbourhood shopping centres.
- 4.7 The whole concept of sustainable suburbs needs to be re-assessed with the role of town centres as the heart of much more self-sufficient neighbourhoods, including distributed energy and localised waste management as well as more local provision of services, able to accommodate higher populations. The apparent failure of the OLC to develop this concept thus far is regretted.
- 4.8 The proposal for a Green Enterprise Zone in the Thames Gateway is strongly supported and should be regarded as the flagship for further green zones supported by a number of “Green Technology Quarters” throughout London.
- 4.9 The rejection of super hubs in outer London is welcomed, together with sustaining town centres at all scales. Growth corridors, stretching beyond the London boundary, i.e. London/Stansted/ Cambridge/Peterborough, Thames Gateway, London Gatwick, Western Wedge, Luton/Bedford, should be given greater support.
- 4.10 Emphasis on maintaining London’s varied stock of open spaces is strongly welcomed, including the idea of the Green Grid throughout London. Strengthened policies to protect smaller areas of open space are needed, including allotments.
- 4.11 What is missing from the proposals is any reference to public realm - streets, squares and the space around buildings. This is vital to improving the quality of life of Londoners and as yet, outside the centre, London cannot match the public realm achievements of many other European cities. The Mayor should pledge support for new programmes to improve public realm in major schemes and to require high quality public realm for smaller schemes.
- 4.12 The Blue Ribbon Network is one of London’s assets and is dealt with here and in other chapters. Policy to make greater use of the Thames and of the navigable rivers and canals for freight, leisure and tourism needs to be supported by the safeguarding of wharves and piers and sites for boat yards and other water related facilities.

5. Chapter 3 – London’s People

Housing

- 5.1 The Mayor states he proposes to maximize the supply of new homes in London with new London wide housing targets. By rejecting the previous administrations 50% affordable housing target, while easing the split between social and intermediate homes, the Mayor condemns many thousands of families in the most acute housing need to years of inadequate accommodation. Not having the target of 50% provision of affordable homes on each development leaves boroughs with a weakened negotiating position, noted by London Councils, and no mechanism for negotiating the mix of homes. Moreover, the Mayor’s borough targets skew the provision of affordable homes towards inner rather than outer London.
- 5.2 We need the Mayor to show how planning for housing will meet the anticipated growth in households in London up to 2031, how the Mayor will tackle empty homes (see Chapter 3 paragraph 111) and whether the implications for demographic change might influence the choice of housing provision in London Borough development frameworks. The Mayor should maintain housing densities in the existing density matrix.
- 5.3 The real effect of the Mayor’s policies and the introduction of so-called “choice” opens the door for boroughs and developers to cut the number of new social rented homes. It also raises the prospect of a reduction in the number of existing socially rented homes through regeneration schemes and the sale of street properties. We are very concerned that in the immediate future, there could be no new additional social rented homes.
- 5.4 The Mayor proposes to optimise rather than “maximise” densities but it is not clear how the policy will be implemented and we need to know if the ratios in the current density matrix of the London Plan are to remain the same. What balance in terms of densities will be achieved between east and west London for example? How will the policy differ in application from the policy as expressed in the 2008 London Plan?
- 5.5 There’s a growing consensus that we need more innovative approaches to housing supply, including new sources of finance and tenures for the private and the intermediate rented sector and a more realistic approach to land values. New models for development need to be taken up such as Community Land Trusts, mutual and cooperative schemes and co-housing.
- 5.6 The recognition of the need for more provision of housing for older people, students and disabled people is welcome.
- 5.7 Also, the proposed internal space standards for new homes are welcome along with greening new homes (see also Chapter 5). These should apply to all homes and not just publicly funded. It is an interesting reflection that many new private sector homes in London are well below acceptable standards for affordable homes. This removes any flexibility of exchanging tenures. The

plan should lead by setting the highest standards of design and accommodation for all new residential development.

Play and Informal Recreation Space

- 5.8 What is not made explicit is the 10 square metres of play and informal recreation space per child and young person in all new housing development.
- 5.9 This was published in draft Supplementary Guidance in February 2008. The Mayor should confirm his support for play and informal recreation provision including requiring developers to find or fund such provision through conditions or Section 106 agreements. Too much of the public realm in London is dedicated to car use and parking forcing children out of streets or public areas where it is no longer safe to play. Provision of adequate play and informal recreation space attacks gang culture at its roots and benefits children and young people's development and health.

6. Chapter 4 – London's Economy

Sustainable Growth

- 6.1 There should be a review of delivery vehicles and the LDA needs to be fit for purpose.
- 6.2 In our comments on Chapter 1, we underlined the importance of encouraging sustainable growth. A city's wealth cannot be measured simply by the way it attracts high-value businesses or high net-worth individuals. It is also in the way it uses natural and human resources – the people, their skills and their potential. Sustainable growth does not mean expansion's sake. We want to see a London in which every member of a growing population is enabled to contribute to and benefit from economic activity.
- 6.3 Recent history has shown that reliance on financial services needs to be balanced with other sectors like higher education, tourism, bio-technology, medical research, and the creative and cultural industries. The 'business services' sector of employment needs to be more closely examined, as it contains a massively diverse range of activities for which a diverse range of needs and pressures exist. And we must set out a clear understanding of the future role of historically declining sectors, such as manufacturing, for which there will remain a significant role and for which new opportunities will open particularly in the high value added sectors. A prime example is the potential of adopting climate prosperity principles for the environmental or green industries has been heavily understated. Promotion of environmental industries should be a major function of planning, economic and transport policy.
- 6.4 The Plan should anticipate the need to foster environmental industries in London and secure adequate sites for growth. There is a crucial need for universities and research institutes to work closely with business and London

government, with spin-offs in related small and medium sized enterprises. These will be the industries of the 21st century.

- 6.5 Low Carbon Zones are strongly supported and the Plan should take the concept further, and plan for them to be introduced across London, spinning off local jobs. There is an acute need for specialist delivery vehicles that can work with public bodies and third sector and bridge with the private sector. Low carbon zones should also be about enabling skills and know-how transfer at community level.
- 6.6 The Plan should expressly link with other strategies that identify the need for funding and other forms of assistance at the strategic level. For example, funding should be available through the LDA to promote uptake of green technologies and other growing sectors at community level. It is also important that the LDA and other GLA bodies strengthen the supplier diversity principles of the administration, ensuring that procurement of goods, works and services promotes the environmental sections of the economy and benefits all sections of the community.

Small and Medium Sized Enterprises

- 6.7 Smaller activities are strategic in aggregate and are the seedbed for the future. The London Plan needs policies that tap the cumulative potential of smaller scale development to make London as a whole more environmentally and economically sustainable.
- 6.8 The draft Plan should contain a suite of policies that positively encourage the role of SMEs. That means encouraging kinds of land use and activity that have a multiplier effect on the local economies, ensuring that revenue generated locally is reinvested and re-circulated locally.

Land and workspace

- 6.9 There are clusters of particular skills and activities in various parts of London, dominated by small- and medium-sized undertakings. The arts and cultural sector is a good example, as is the environmental sector.
- 6.10 These clusters often start the regeneration of areas that face economic challenges. They need the support of the planning system as they are low-margin businesses, sensitive to factors such as land cost. We need both cultural quarters and green quarters. On the larger scale, intervention is needed to secure land for the bigger environmental industries such as science and technology parks.
- 6.11 Policy on affordable retail and business space town centre developments that avoid the “clone town” problem, found in so many local town centres are supported. Challenging homogeneity is good for both environmental and economic sustainability.

7. Chapter Five – London’s Response to Climate Change

Meeting the revised CO2 target

- 7.1 We assume, apart from a few specific issues, that the policies in the current plan 2008 Alterations will be carried forward. Nevertheless, of all the Mayor’s proposals, this chapter is the most disappointing. There is no indication of how the Mayor’s proposals will meet the target of a 60% reduction in London’s CO2 emissions below 1990 levels by 2025. This Chapter needs to show how this will be achieved and, in summary, how other strategies and policies will contribute and what further help from government is needed. The chapter fails to take this on board and explain how climate change mitigation measures will be built into every principal area of London Plan policy – transport, housing, the economy - or how climate change impacts will be used to appraise and monitor policies.
- 7.2 The Mayor inherited the last administration’s Climate Change Action Plan. This should be the starting point for this chapter. Half of the CO2 reductions from will come from improving then energy efficiency of buildings and the appliances within them, and half will come from “greening the grid” and generating energy locally.
- 7.3 Government aims at reducing our carbon emissions by 60-80% by 2050. There is also a plan for all buildings to be zero carbon by 2016. However considering we are only replacing about 1% of existing buildings per year, the positive impact of zero carbon new builds is limited. Therefore, retrofitting was identified in the Stern Review on the Economics of Climate Change as the most cost effective measure of reducing the total CO2 emissions. Most of the savings have to come from existing buildings.
- 7.4 It can be anticipated there will be legislation to incentivise energy and utility companies to cut energy consumption and there will be minimum standards of energy efficiency required for all buildings.
- 7.5 The question how to encourage and enable efficient energy use, efficient energy supply and renewable generation in the existing built environment is a major strategic issue for London planning policy. In particular, how to bring energy efficiency, local generation and renewable energies together in an integrated way.
- 7.6 Realising the potential of retrofitting in cutting CO2 emissions and supporting its target of reducing carbon emissions means the London Plan should direct the Boroughs to promote a positive retrofitting strategy and a wider programme of carbon management across London’s built stock, through a comprehensive Low Carbon Zone approach, [bringing energy efficiency, local generation and renewables together??] (cf Woking). For boroughs to take a positive lead, they need a strong policy framework that enables them to innovate.
- 7.7 This policy framework should give Boroughs the guidance they need from the Mayor so that Local Development Framework (LDFs) policies can improve the

response to climate impact, both in terms of mitigation and adaptation, in terms of existing and future buildings.

7.8 There are numerous ways in which Boroughs through their LDFs can achieve this, for example by:

- encouraging a zonal approach at either district or neighbourhood level e.g.
 - Ensuring new developments of any scale in mixed use neighbourhoods incorporate low carbon, centralised heating/cooling/electricity facilities and that nearby dwellings can connect at minimal/low cost.
 - Taking a communal approach to micro-generation – e.g. one inverter for solar panels per neighbourhood, as demonstrated in Woking, or where wind power is viable, one wind turbine per area, as in Freiberg.

7.9 Making clear that smaller scale development (including householder development requiring planning permission) should include proposals to incorporate energy efficiency and (where appropriate) microgeneration measures enabling such measures to be readily included in the granting of planning permissions and where appropriate; -

- ensuring their heritage policies (including policies on conservation areas) contain a clear indication that well-designed and carefully sited renewable energy installations will not be regarded as harmful to the historic built environment or to the character and appearance of the area;
- adopting sustainable alternatives to energy-intensive plant to existing buildings;
- supplementing planning policy with targeted advice and assistance to the fuel poor;
- adopting Supplementary Planning Documents (SPDs) containing these and other locally appropriate measures.

7.10 London plan policy should make clear in general terms that the Mayor will expect LDFs to make adequate provision, and will use his 60% by 2025 target as a benchmark for the carbon savings to which this and other aspects of each Borough's LDF will be expected to contribute.

7.11 On new development, we are concerned that the policy proposals to promote a 'balanced approach' to encouraging sustainable energy in new development could be a weakening of CO2 reduction measures. This should prioritise the neighbourhood energy system approach, using new development as an anchor for the existing neighbourhood and including renewable energy.

Two other policies seem to be seriously weakened as proposed:

7.12 **1. Manage London's waste**

There maybe a need for some large waste sites but all the evidence suggests more smaller neighbourhood sites in order to take some of the new technologies (gasification, anaerobic digestion etc.) producing renewable gas, (e.g. biogas or syngas).

7.13 **2. Safeguarding wharves** must remain a priority. 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. The current criteria for wharves management should continue to prevail.

8. Chapter Six – London's Transport

8.1 We welcome the transport chapter's aim to cut the need to travel in London, but it is not followed through in the policy and investment proposals. The Mayor needs to introduce a wider choice of sustainable travel options to enable people to travel and get around London in a more sustainable way.

8.2 The London Plan proposals are the opportunity to make the connection between the development opportunities and investment in transport over the long period 2031. The original London Plan provided the shopping list for the transport projects essential to meeting the plan's objectives.

Transport Projects

8.3 Planning for transport over 20-25 years cannot only include projects that are currently funded. The Mayor's transport strategy should reinstate the following schemes:

- Cross River Tram
- East London Transit
- Greenwich Waterfront Transit
- Croydon Tramlink Extensions beginning with the link to Crystal Palace
- DLR extension to Dagenham
- An upgrade to the Blackwall Tunnel
- A Thames Gateway Crossing – funded already by PFI credits along the existing Thames Gateway alignment.

8.4 The Mayor should be championing these projects to the Government, acting as a driver for future funding decisions and keeping them in development for the post 2017 transport settlement. It is essential that the Mayor ensures that Borough Local Development Frameworks continue to safeguard corridors.

Further he should be looking ahead and planning new projects after Crossrail such as a further crossing at Blackwall and a new Thames Gateway Bridge. Major infrastructure projects take years to plan and it is the function of this plan to plan for long-term infrastructure.

8.5 But this is not enough for London. He should be looking even further ahead. What next after Crossrail? The Mayor must adopt now ambitious plans for London's future. For instance

- Crossrail 2 – Clapham Junction to Kings Cross
- Underground extensions e.g.
 - Northern Line to Battersea
 - Bakerloo Line to Camberwell and Catford
- Four tracking rail services between Tottenham Hale/Seven Sisters and Stansted

Transport and regeneration potential

8.6 The Mayor's transport and economic development strategies and 'A New Plan for London', all fail to provide plans for better transport for areas with regeneration potential. Growth in housing and jobs cannot be achieved without providing the vital new and improved transport infrastructure that will support this growth. With the population set to increase, and correspondingly the demand for housing and jobs, the transport system will need to make year-on-year improvements.

8.7 Alongside this there needs to be a sustainable policy of the co-location of jobs, homes and recreation/consumer opportunities which will reduce demand and the need to travel.

8.8 It is critical that the Mayor keeps his promise to deliver better transport for outer London. However, key transport projects for Outer London including the Croydon Tramlink extensions, the East London and Greenwich Waterfront Transit and the Thames Gateway Bridge have all been cancelled. London's economic prosperity must not be limited to central London, but growth, especially in outer London, is only sustainable if it is supported with better public transport.

8.9 To truly support Outer London growth the Mayor should be focusing on enhancing public transport in growth corridors, providing better links between town centres and enhancing services into local district and town centres. Car-choked town centres are less, not more attractive to businesses and consumers. Again, the environmentally and economically sustainable go hand in hand. This casts a serious doubt on proposals to consider relaxing parking standards in town centres. More important is to ensure out of centre retail and leisure pay an economic rate for car park provision to create a level playing field.

Buses

- 8.10 In outer London, we need a comprehensive review of bus provision to ensure services respond to changes to journey patterns e.g. new employment areas, hospitals, schools, shopping areas and leisure centres. A rethink is needed about the types of service offered from express routes (with, where possible, dedicated segregated tracks so that buses can behave more like trams) between town centres to hail and ride in low density suburbs. Computer technology with satellite tracking should be re-inventing suburban bus services.

Transport and Technology

- 8.11 There are unlikely to be the same patterns of work and travel in the future. Cities like Amsterdam and Birmingham are already piloting new ways forward such as “smart” business centres, providing the latest technology to people working remotely. The importance of IT in changing travel and working patterns is particularly important for outer London, where traffic and congestion levels are high and CO2 emissions per capita are much higher than in inner London.
- 8.12 IT also has implications for much more sophisticated and responsive public transport systems. The concept of a “New Mobility Hubs Network” of transfer points around a city where connections can be made easily from one mode or service to another should be introduced. These enable seamless door-to-door journeys using a range of technologies. These new technology uses should be encouraged in planning policy in town centres and transport interchanges at all scales.
- 8.13 We welcome proposals for electrical charging infrastructure for electric and hybrid vehicles. It is vital that a rising proportion of the energy is from renewable sources and is part of the Low Carbon Zones and decentralised energy systems. This infrastructure needs to be incorporated in all new developments and existing parking spaces.

Conclusion

- 8.14 There are too many disjointed policies in the transport chapter. As a consequence, it is not clear that the modal shift from car to bus, tube, walking and cycling will continue nor whether transport investment will serve or promote the long term sustainability of London, especially the 60% reduction of CO2 emissions by 2025.

9. Chapter Seven – London’s Quality of Life

- 9.1 Quality of life is the goal of climate prosperity, and comprises a range of factors which are central to London’s future success in attracting business investment and the skills London needs as a world city. It also must be recognised that the quality of life for Londoners in parts of inner and east London are very different to the experience in the more prosperous areas. A

key aim must be to focus on the parts of London in greatest need of improvement through a constellation of policies and programmes.

- 9.2 It is a matter of concern that London's poor air quality and congestion mean that London is now ranked fourteenth in Europe for quality of life and 27th for urban pollution. We are going backward. We should reinstate the third phase of the Low Emission Zone and explore new policies emulating other cities with Low Emission Zones for cars e.g. Berlin. The Mayor should say how he will deal with air quality. When he will be reintroducing the LEZ and how he will be going beyond it.

Building London's neighbourhoods and communities

- 9.3 The neighbourhood approach is welcomed, and the protection and enhancement of local character. The idea of "lifetime neighbourhoods" is especially welcome. This should be widened to include energy, water, waste and local self-sufficiency and be re-branded as "sustainable lifetime neighbourhoods",

Green spaces

- 9.4 Also greatly welcomed is support for all London's green spaces and for the opportunity to create new green space. It is important that the 10 sq metres of play and informal recreation space for each child in new housing developments is used to enhance existing and create new open space.
- 9.5 The extension of the Green Grid concept to the whole of London is welcomed. It is often the smaller spaces which are most valued by communities and which can be the most vulnerable. Therefore, the strengthening of policy protection is supported.

Strategic Views

- 9.6 The new London Plan will re-establish the framework for the protection of strategic views. We note from the draft SPG that the Mayor proposes to change the terminology from London View Management Framework to the London View Protection Framework.
- 9.7 London's skyline and townscape has changed since 1991 and must continue to evolve. The Draft SPG proposes to widen all elements of the viewing corridors and in addition creates two new viewing corridors, which together with Protected Silhouettes will have the cumulative effect of significantly narrowing opportunities for new iconic development in central London. Such developments could be landmarks in their own right.
- 9.8 There is a concern that opportunities for tall buildings around transport hubs and for replacing very poor quality buildings will be lost. This could lead to a static townscape in which the dynamism which has characterised London's development will be stifled.

- 9.9 There is an argument to review some of the designated views that have lost some of their impact and to consider new views that could be proposed for designation. This does not mean to say that existing strategic views would lose a designated status but rather, they could be adopted as local views by the appropriate London Borough. The philosophy and rationale for the choice of existing views requires explanation. Some choices regarding strategic views have evolved historically without a proper rationale. There is scope for the inclusion of new views in London, giving weight to long distance vistas from the City to Canary Wharf and for river prospects, for example. It is also important that the contribution of tall buildings to London's skyline should be included under policies for public realm and urban design.

Tall Buildings

- 9.10 The Mayor states that tall buildings will be sited where the existing context, and boroughs, can support them. This approach removes responsibility from the London Plan to provide the steer on the approach to tall buildings. This is contrary to national policy statements (PPS 1) and the CABE/EH Guidance on Tall Buildings 2007. There should be a plan-led approach to the development of tall buildings and the criteria in Policy 4B.9 and 4B.10 (location of tall buildings and design criteria for large-scale buildings) should be reviewed and supported by clearer guidance on tall buildings in strategically important areas in London. This could be supported by a commitment to produce an SPG to support London Boroughs with the development of their own policies and SPDs on tall buildings.
- 9.11 Evidence suggests that Boroughs who have tried to produce their own guidance in this area struggle to get it adopted. This has been demonstrated by the recent controversy around Wandsworth Council's tall buildings policy. The development of tall buildings can only be planned at a strategic London-wide level, as environmental effects extend across Borough boundaries and they affect the fundamental character of the wider city. Tall buildings therefore require a strong and robust policy base and the appropriate place for such policies is the London Plan.
- 9.12 The Mayor refers to specific contextual factors for consideration of the London Plan. Amongst issues to address should be policy on the suitability or otherwise of tall buildings to provide residential accommodation, particularly family accommodation. However, the Mayor should support tall buildings in clusters and at transport hubs.

Public Realm

- 9.13 This state of London's public realm is way behind that achieved in most other European cities. It has a crucial impact on people's perceptions of place and the quality of their lives. Issues that need to be addressed include design, materials, access, maintenance and climate change proofing, as well as amenity space and the quality and accessibility of the streetscape.

- 9.14 The Plan should recognise the value of public squares and should provide policy support for the many popular public initiatives to improve or reclaim public spaces that was begun in the previous administration.

London's Gardens

- 9.15 London's gardens are a very important part of the urban fabric and contribute to the distinctive character of neighbourhoods and London's ecological biodiversity. Together with London's larger green spaces and woodland, they are London's lungs. There should be a policy on the London Boroughs use of directions under Article 4 General Permitted Development Order regarding for example the promotion of restricting planning permission for development on land that is currently used for front and back gardens as hard standing. In addition, there need to be policies for all hard standing areas in front or back gardens to be fully permeable so they do not affect the rate of storm water run-off.

Revitalise London's Waterways

- 9.16 We believe that the following steps should be considered in order to revitalise London's waterways:
- A Woolwich Ferry upgrade
 - A new crossing at Thames Gateway
 - Ensure Thames and canal wharves are protected where opportunities exist for industrial use, particularly Green Industries
 - The use of river and canals for freight and waste transportation should be maximised
 - The huge scope for increasing the leisure use of the Thames, the rivers and canals should be fully explained.

The Blue Ribbon Network

- 9.17 In respect of the Blue Ribbon Network, concern is expressed that considering the possibility of development on safeguarded wharves on the Thames and on tributary rivers and canals increases "hope value" and makes their retention for water freight more difficult.

10. Chapter Eight – Implementation, Monitoring and Review

- 10.1 The collaborative approach, engaging the pantheon of organisations involved in planning and the delivery services, the development process and urban management is supported.
- 10.2 However, the urgency of addressing climate change means that collaboration must not be at the expense of positive leadership and action. The use of S106 funds and the community infrastructure levy for energy, water and waste management projects needs to be given priority, given the urgency of cutting London's CO2 emissions.

- 10.3 Monitoring needs to be relevant and based on the Mayor's vision and objectives. All key strategies and especially the new London Plan need:
- a strong mid-term focus for the next 10 years beyond the 2015 catastrophic climate change 'tipping point'.
 - Quantified stages to achieve the 60% reduction target in CO2 by 2025 with intervention to correct market failure. ('Back-casting'¹)
- 10.4 However, it is vital that "back-casting" from 2025 on annual CO2 emissions cuts includes proposals to increase the rate of reduction if annual targets are missed, which can be implemented without going through the process of formally altering the London Plan.

¹ This essentially means assessing what you need to achieve your goal and working back from your target assessing when you need to have achieved specific milestones to check you are making the necessary progress required. If you are not, you will need to do more.