

Summary: 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

The London Plan and its associated strategies must set out the policies for London development.

But they must also set the stage for tackling the huge issues. London in its national and international context – the world recession, increasing inequality and climate change.

This is the time for active government not small government. For a bold London Plan not a “London Plan Lite”.

“Integration” and “sustainability” are the two themes that run through the GLA Acts of 1999 and 2007.

We, therefore, welcome the intended integration of the new spatial plan with revisions to the Transport, Housing and Economic Development Strategies.

This must be extended to integrate the Climate Change Mitigation and Energy and Climate Change Adaptation Strategies.

The original London Plan of 2004 sought to develop London as an exemplary, sustainable world city.

It was based on three big ideas:

- To accommodate London’s projected population and employment growth within the London boundary in a more compact urban form.
- To link mixed use, mixed housing tenure and types with social infrastructure investment and a new and extended public transport system.
- To address inequalities in wealth and opportunity between different parts of London.

At the time the plan was produced, the London economy was buoyant, unemployment low and the priority was to deal with the backlog of investment in transport, homes, schools and hospitals.

The growing importance of climate change at all levels of government meant that the first significant revision of the London Plan in February 2008 (associated with a substantial increase in Mayoral powers in the 2007 GLA Act and the publication of the London Climate Change Action Plan) provided a raft of policies to cut London’s greenhouse gas emissions.

The context now is more serious and more complex:

- World recession with local unemployment and stagnation along with pressures to cut public spending.
- Mounting evidence that climate change is likely to reach a key tipping point within the next decade
- Widening inequalities

The 2004 and 2008 London Plans were major leaps forward in thinking.

The new London Plan and the associated strategies needs to be at least as cutting edge in the changed context, taking London through the next ten years when the Plan will be “live”.

However, the draft Plan proposals represent a backward step not the much needed advance.

Weak policies on affordable homes and no new transport projects to replace those the Mayor has abandoned mean London will be less sustainable, less equitable and less dynamic in 2020 than it is now.

In response to the need for energy, economic and climate security, the Mayor has proposed a “London Plan Lite” – not the charismatic leadership and direction London urgently needs, which should:

- Build on the best practice and other initiatives developed through the C40 Large Cities Leadership Climate Group that London initiated in 2005.
- Clarify the opportunities that tackling world recession and climate change together offer the financial and business services and other sectors of the London economy.

The starting point should be the ambitious target of cutting London’s GHG emissions by 60% from 1990 levels by 2025 – accepted by the new Mayor.

This needs a “benefit-benefit” solution, harnessing economic expansion and environmental stewardship together to achieve sustainable development - what is called “climate prosperity” in the USA.

A green economy, not just a green sector – all jobs and activities having a green dimension – heralding a paradigm shift to an advanced, resource efficient industrial economy.

Green savings – cutting costs, reducing waste and saving money for individuals, families, businesses and the public sector.

Green opportunities – creating new businesses and jobs across all sectors of the London economy.

Green skills – scaling up demand for entrepreneurial and professional skills, new and existing trades across the whole economic spectrum.

Green communities – more local self-sufficiency in energy, CCHP, waste management, community-based business, urban agriculture.

The climate prosperity framework is the opportunity for London to work with governments nationally and internationally, to help frame and implement post Copenhagen legislation.

Conclusion

There are three big challenges facing London in the next critical decade: the economic recession, growing inequalities and climate change.

These issues can be addressed in an integrated way aligning the economic recovery with tackling climate change.

London Acts are premised on sustainable growth.

London will become wealthier and more equitable by using and re-using resources more efficiently.

Sustainable growth and climate prosperity should be the centre-piece of the London Plan and all other mayoral strategies.

This is the time for active government, not small government.

Every objective, every policy, every strategy the mayor produces must show:

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?

2. Detailed comments

Critique of the Mayor's Vision

The Mayor's vision is not based on the GLA's principal purposes, which set the goal of sustainable development.

As a consequence, the London Plan will not give a sufficient steer to the London Boroughs and other stakeholders on how to meet sustainable development objectives and climate related targets.

Planning for a Changing London (Chapter 1)

- Demographics are explained and the population projections for young and older people must be matched by investment in social and community infrastructure.
- Employment projections are problematic:
 - (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.
- The assumption is that this is a cyclical employment blip and that employment growth will return. This business as usual model has to be questioned. There needs to be a positive strategy to promote jobs in all sectors and particularly the green sector.
- Poverty associated with unemployment and low skill levels and especially the shocking levels of child poverty must be a priority for the Mayor.
- The Mayor's approach set out in para 59 – consensual working must not lead to lowest common denominator. Mayor's job is to give positive direction.
- The Mayor's objectives need to make a strategic statement of the planning sustainability aims.
- Objective 1 must be meeting the challenges of economic and population growth needs to spell out the paradigm shift to sustainable growth. Much of London's growth has been unsustainable.
- A change in the structure of employment is implicit in addressing climate change.

- The impacts of climate change are likely to fall disproportionately on the most deprived.
- As London's population increases, sustainability means find a fairer distribution of the benefits.
- Taking the above factors into consideration, London Plan 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.

London's Places (Chapter 2)

Cross regional issues

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.

London's role in leading by example e.g. setting up the C40 Large Cities Climate Group must be reaffirmed and developed.

Sub-Regions

Welcome the redrawing of sub-regions, but query Central Area and tension of Central Business Districts and need to link that development to the regeneration and other needs of adjoining areas of Inner London. Role of Thames Gateway, needs to be clearly set out.

Support growth corridors, stretching beyond London boundary, i.e. London/Stansted/ Cambridge/Peterborough, Thames Gateway, London Gatwick, Western Wedge, Luton/Bedford.

Outer London Suburbs

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.

Re-assess concept of sustainable suburbs needs with the role of town centres at heart of self-sufficient neighbourhoods. A review of the hierarchy of town centres and their respective roles is supported but is that done? Need:

- Level playing field between out of town centre and town centre retail.
- to look at the protection and promotion of district and neighbourhood shopping centres and car parking policy.
- more self-sufficient neighbourhoods, including distributed energy and localised waste management as well as more local provision of services, able to accommodate higher populations.
- much improved public transport links between town centres, especially outer London, and better walking and cycling facilities.

(Issues to cross refer in Chapter 7)

Proposal for a **Green Enterprise Zone** in Thames Gateway supported but should be GEZ in other parts of London. Emphasis on varied stock of open spaces is strongly welcomed, including the idea of the Green Grid and protect smaller areas of open space.

No reference to public realm.

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 facilities.

Housing & Affordable Housing (Chapter 3)

- Mayor proposes to optimise rather than maximise densities. We agree. Will the ratios in the current density matrix of LP remain the same? What will the density balance be between east and west London e.g?

- How will the policy differ from the 2008 London Plan?
- Will minimum space standards in forthcoming proposed London Housing Design Guide be adopted in the private sector? Mayor to confirm that standards across all sectors to be adopted by 2011.
- Need to maximize the supply of new homes with new London wide housing targets. Mayor rejects Livingstone's 50% affordable housing target, and eases split between social and intermediate homes.
- This leaves boroughs with weakened negotiating position and no mechanism for negotiating the mix of homes. Mayor's borough targets skew provision of affordable homes towards inner rather than outer London.
- With these policies it is inevitable that London's housing will become more ghettoised and its communities less mixed.
- Are policies referenced to the evidence base i.e. Strategic Housing Land Availability Assessment SHLAA (PPS 3 Requirement) and Strategic Housing Marketing Assessment SHMA) and tested against benchmarks from National Housing and Planning Advisory Unit.

Mayor must show:

- how planning for housing growth is met despite down turn
- how he will tackle empty homes
- whether the implications for demographic change might influence the choice of housing provision in London Borough development frameworks. No mechanism for negotiating the mix of homes.

Play and Informal Recreation Space

Mayor to confirm his support for play and informal recreation provision as in SPG and the 10 square metres of play per child target.

The Economy (Chapter 4)

- There should be a review of delivery vehicles and the LDA needs to be fit for purpose.
- Sustainable growth does not mean expansion for expansion's sake. We need a London in which every member of a growing population is enabled to contribute to and benefit from economic activity.
- Reliance on financial services needs to be balanced with the development of other sectors e.g. higher education, tourism, medical research and the creative and cultural industries.

- How will London's finance and business services re-align to focus on carbon trading and on promoting world investment in green technologies?
- A significant role for manufacturing in the future shall be especially in the high value added sectors – prime example is the green industries (heavily understated in this document).
- Need sites for environmental industries.
- Universities and research industries need to work closely with business.
- What are implications of policies for research, service, manufacturing and distributive activities and contribution to sustainable development, more diverse employment and tackling of inequalities?
- Green the London economy and promote environmental industries is there an action plan?
- Child poverty must be a priority for the Mayor. How are low skills addressed?
- Low Carbon Zones strongly supported, but there is no recognition of the need for specialist delivery vehicles to bridge between the public and the private sector.
- Positively **encourage the role of SMEs**.
- Need to fundamentally **change the business model** for the whole London economy and the pattern of demand for employment land.

Land and workspace

Recognise clusters of particular skills and activities in various parts of London, dominated by small- and medium-sized undertakings. Promote cultural and green quarters and intervene to secure land for the bigger environmental industries such as science and technology parks.

Need policy on **affordable retail and business space** town centre and developments that avoid the “clone town” problem.

Climate Change (Chapter Five)

Mayor has retained the ambitious targets of cutting London's greenhouse gas emissions by 60% from 1990 levels by 2025 but not the mechanisms to achieve them.

- Need to contribute further legislation to incentivise energy efficiency and local renewable energy systems.

- Carbon and financial budget needed for every policy initiative. Not clear how future policy change will be assessed. Mayor needs to give strong policy framework and guidance to the Boroughs.
- Need policies to enable efficient energy use, efficient energy supply and renewable energies plus zero/low carbon local generation in an integrated way.
- Direct 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 at either district or neighbourhood level.
- Need to ensure 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. Plan should prioritise the neighbourhood energy system.
- Incentivise a communal approach to micro-generation.
- Mayor should ensure that 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;
- Supplementing planning policy with targeted advice and assistance to the fuel poor;
- 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.
- Concern that balanced approach to encourage systems means a weakening of CO₂ measures.

Waste

Mayor proposes large waste sites. There may be a need for some but all evidence suggests that new technologies need small neighbourhood sites.

Safeguarding Wharves must remain a priority to counter hope value (development) reasons and to preserve river related uses and principal and sustainable transport.

Transport (Chapter 6)

Transport Projects

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. Mayor has abandoned some major projects so expect increase in car journeys. Transport strategy should reinstate major schemes such as:

- Cross River Tram /East London Transit/Croydon Tramlink Extensions
- Mayor should plan for the post 2017 transport settlement. Where are the new at the Blackwall Tunnel and a further crossing along along the Thames Gateway Bridge alignment. Mayor must adopt ambitious plans. For instance: Crossrail 2 – Clapham Junction to Kings Cross / Underground extensions
- Essential Mayor should safeguard corridors for planned and future schemes. Nb many in Outer London. Mayor should have better links in growth corridors.
- Lack of integration with economic development strategy undermining regeneration and accommodating increased population.

Buses

- Outer London, a comprehensive review of bus provision is needed to ensure services respond to changes to journey patterns e.g. new employment areas, hospitals, schools, shopping and leisure centres.
- A rethink is needed about the types of service offered from express routes between town centres to hail and ride in low-density suburbs. Computer technology with satellite tracking should re-invent suburban bus services.

Transport and Technology

Does the Mayor have anything – Lack of emphasis on IT in changing travel and working patterns – particularly important for Outer London.

- 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.
- We need to introduce more sophisticated and responsive public transport systems. New technology such as the U.S. New Mobility Hubs Networks for seamless journeys should be encouraged.
- Electrical charging infrastructure for electric and hybrid vehicles welcomed.

General comment: Too many disjointed policies in the Mayor's transport chapter. Not clear that the modal shift from car to bus, tube, walking and cycling will be achieved or the 60% reduction of CO2 emissions by 2025.

London's Quality of Life (Chapter Seven)

- **Air Quality**
Mayor needs to reinstate the third phase of the Low Emission Zone at the earliest possible date and explore new policies emulating other cities e.g. LEZ for cars in Berlin.
- **Building London's neighbourhoods and communities**
Lifetime 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** 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.
The extension of the Green Grid welcome throughout London.
- **Strategic Views**
Policy concern that it will not be sufficiently balanced with requirements for new and iconic buildings that may become landmarks in their own right. Draft SPG proposes widening of viewing corridors so leaving little space for development for iconic buildings.
- **Tall Buildings**
Need a strong and robust policy base – should be a plan-led approach; cannot be left to boroughs as this would be contrary to national policy. Need policy on the suitability or otherwise of tall buildings to provide residential accommodation, particularly family accommodation?
- **Public Realm**
The Plan should recognise the value of Public Squares and support popular public initiatives to improve or reclaim public spaces. Very little on public realm in this document.