

MAYOR OF LONDON'S "PLANNING FOR A BETTER LONDON"

COMMENTS BY LONDON FORUM OF AMENITY & CIVIC SOCIETIES: NOVEMBER 2008

Foreword

The London Forum welcomes the reference to London's "extraordinary heritage", the need to tackle disparities in wealth, health and quality of life and the need to provide prosperity for all parts of the city and all Londoners.

The London Forum supports the key themes:

- Homes, opportunities and services for all Londoners
- Businesses should have opportunities to grow
- Improving London's environment and tackle climate change
- Cherishing and protecting London's distinctive character, its diverse neighbourhoods and unique neighbourhoods
- All Londoners sharing in their city's success, feel safe and enjoy an improving quality of life

In particular, the London Forum **welcomes** the commitment to working in partnership with local communities and to improving planning in London.

The Mayor's fifth theme is appreciated for helping all people in London to be successful and enjoying a better quality of life. Those aims will not be simple for a spatial development strategy to deliver. There will need to be strong relationships of the Mayor's London Plan with his other strategies, his guidance and best practice guides. Only then can the four themes of borough Local Area Agreements and their outcomes be supported and achieved.

The link between quality of life policies and spatial development policies at borough level is the close relationship and interdependence of the Sustainable Community Strategy and the Core Strategy, expressed as interlinked LAA themes and development plan content. To achieve the Mayor's aims, similar links will have to be achieved between his own policies and the LAA targets of the local authorities and of all those who influence quality of life in London. The Mayor will need his own Regional Strategic Partnership with those organisations to devise the actions necessary to achieve a new set of indicators for success on the lines of the LAA ones.

In that way, people will see the basis of the partnership mentioned in the Foreword that the Mayor wants with local communities. Those communities are to be empowered, according to the 'Communities in Control' White Paper, and their opportunities should apply also to the GLA for the availability of information, petitioning, influencing budgets and policies, having a say, holding those with power to account, providing redress when things go wrong and participating in community land and asset trusts.

Introduction

This document is about “planning”, but does not convey that the purpose of the London Plan is the spatial development strategy for London, the lead strategy for the physical development, economic development and transport planning of London. The key policies and major proposals of the other strategies (eg transport and housing) should be brought forward into a revised London Plan.

1. The Mayor’s Approach

A new approach

The London Forum strongly supports the proposed more consensual approach to planning, with less intervention on non-strategic matters – indeed limiting intervention, especially taking over cases from the Boroughs, to genuinely strategic issues. This will require a much better definition of what is “genuinely strategic” – otherwise there may be legal challenges.

As part of this more consensual approach, **we welcome the commitment that City Hall – the GLA, LDA and TfL – will work closely with the voluntary sector, especially that part that is involved in planning, transport and the environment.**

The London Forum would welcome the Mayor producing and publishing:

- **a Statement of Community Involvement**, in the same way as the Boroughs do, which sets out the Mayor and GLA’s commitments for involving the community in plan making and development management, indicating how he intends to directly involve the community;
- **a propriety statement** which sets out how the Mayor engages with developers in a manner which will not compromise his quasi-judicial role; and
- **a statement of the how third parties can present objections in the event of the Mayor taking over cases from the Boroughs.**

These statements are essential following the recent changes to the Mayor’s planning powers which have made him a “local planning authority” for the purpose of determining planning applications.

Monitoring rather than Targets

The London Forum notes the new approach of depending less on targets and the machinery that goes with them, but rather depending on “rigorous monitoring of implementation and assertive management of obstacles that put agreed planning objectives at risk”. We would welcome some clarification as to how this will be achieved. It is often too late to make changes based on permissions let alone on completions in the London Development Database. There are problems of time-lags for data to go into the database let alone be reported, thresholds for inclusion, mistakes and omissions. Cumulatively this

means that there is a large time-lag in picking up let alone acting on problems. There need to be better mechanisms for picking up early warnings of policy stress.

Housing of too high a density, with too many small units and lacking amenity space for its occupants, has been approved and positively supported through the planning decisions process of the GLA. Tall buildings have been granted permission in locations the Plan should prevent. Inspectors recommendations after inquiries to refuse planning permission have been overturned by the Secretary of State because the London Plan policies were either not clear or were ignored. Policies for maximising the use of space have been used by developers to introduce schemes lacking context sensitivity, despite design policies, which overload the local infrastructure without mitigation and harm their location.

The policies of the London Plan and interventions by the Mayor when required on matters of strategic importance must prevent continuation of those problems.

Planning for all of London

The London Forum welcomes the commitment to finding a better balance in the Mayor's focus between Central, Inner and Outer London. However, the London Forum is concerned about the liveability of neighbourhoods throughout London. Whilst Outer London has lower densities and cannot support a wide range of local services within walking distance of home or easy access to public transport, these are universal issues – we need to strengthen local centres as the focus for neighbourhoods, preferably walkable neighbourhoods.

The London Forum welcomes the commitment to review the current model of sub-regional working, especially the need for a Central London sub-region – not just taking the City out of East London. We therefore support a moratorium on further work in sub-regional implementation frameworks.

London and its neighbours

The London Forum **supports** the proposal to improve working arrangements with the surrounding regions and sub-regions.

The London Plan

The London Forum whilst supporting the broad thrust of the London Plan, welcomes the opportunity to review how the policies are working and make changes where there they have created unanticipated pressures, such as the misuse of the Density Matrix (which we otherwise strongly support) and the pressure for tall buildings generated by the London Plan. We consider that there should be a review of how these policies have worked since 2000, and to make changes to the wording of these policies and review the locations identified as “suitable for high buildings”.

We agree with the Mayor's intention to promote inspiring architecture, high quality urban design, context sensitivity and enhancement to the local quality of life.

The Mayor's Role

The London Forum **supports the redefinition of the Mayor's role, in particular his determination to focus on "genuinely strategic issues"**. We expect the next version of the London Plan to be clear about the type of developments which are genuinely strategic in London-wide terms.

The London Forum strongly supports the proposal to make the London Plan more accessible and user friendly. The printed version is almost inaccessible except to regular users – it needs an index. The electronic/pdf version can at least be word-searched.

The London Forum **strongly supports** the use of supplementary planning guidance, best practice guides and implementation reports and welcomes the proposal to make them more user friendly.

The London Forum **supports** the proposal for an Annual Planning Convention as a forum for discussion of major issues.

Planning Decisions

The London Forum would support the use of the Mayor's power to direct refusal where a development would undermine the delivery of key objectives for London, harm London's unique status, undermine liveability, but would object to the Mayor taking over cases unless they were genuinely strategic.

The London Forum is reassured that the Mayor will use his powers to take over planning cases from London Boroughs only in the most exceptional circumstances – we consider that very few cases will be sufficiently strategic that they would prejudice the implementation of the London Plan.

Key Questions:

- **Approach – the London Forum considers that the approach is travelling in the right direction, although see above for reservations**
- **Balance – the London Forum considers that the proposals are moving in the right direction**
- **Other improvements – see above**
- **Annual London Planning Convention – London Forum supports this proposal.**

2. The Key Challenges

Continued Population Growth

The London Forum recognises that London's population and, particularly, the number of households is growing, even though there may be a drop in immigration over the next few

years. The London Forum is, however, concerned that the London Plan (and Borough LDFs) has focused too much on housing often to the neglect of associated social and physical infrastructure.

We are **concerned** that:

- new housing should be built to adequate space standards – we welcome the Mayor’s commitment to secure higher space standards such as those proposed by Parker Morris;
- new housing has adequate amenity space;
- adequate provision is made for new schools and that land and buildings in educational use are not lost to housing
- adequate provision is made for new leisure and health facilities, such as group practices rather than polyclinics

London’s Changing Economy

The current recession provides useful breathing space to reassess the growth rate of the London economy in the short to medium term, the forecast additional jobs, the future space needs and location of financial services and business services within London, and, in particular, the extent that town centres outside the Central Activities Zone should provide some of the additional space.

The London Forum **welcomes** the emphasis given to small and medium-sized businesses and considers that the London Plan needs to give these more of a policy emphasis (Currently only mentioned in Policies 2A.9; 3A.17; 3B.1; and 3B.2). These must be prime candidates for expansion outside CAZ and Canary Wharf – preferably in town centres.

The London Forum **welcomes** the intention to sensitivity test alternative growth assumptions. Similarly, there is a need for some scenario work to test the nature and amount of business services required in 25 years’ time. What reason do we have to believe that the next 25 years will have the same direction of travel as the last 25 years? Some assessment of the risk of it being different needs to be undertaken. All of this may mean reassessing the quantity of “office” floorspace needed.

Improving the environment and tackling climate change

The London Forum **welcomes** the Mayor’s commitment to increasing London’s resilience to climate change, by adopting policies to adapt to and mitigate the effects of climate change.

The London Forum **welcomes** the fact that access to green open spaces is being given priority, backed by concerted action to improve their quality and accessibility.

The London Forum also **welcomes** the priority being given to protecting the built environment and our architectural heritage – especially our World Heritage sites and the other buildings, parks streetscapes and places valued for their historic importance. We would like to see this given more emphasis in the revision of the London Plan. Conservation of London’s built heritage, townscape and views has gone backwards in the last ten years, due to pressures for development and inadequate planning controls. The legacy of the last

ten years is at its worst along the Thames – a legacy of which we should be ashamed. Large stretches of the Thames have been ruined.

The London Forum **is particularly concerned** about the number of inappropriate tall buildings that have been encouraged as part of the drive to maximise the use of sites with little consideration of their impact, the ability of public transport to support them or their sustainability. There has been confusion between high density and high rise.

The London Forum is **concerned** that the London Plan, especially Chapter 5, is littered with statements that tall buildings may be appropriate in various Opportunity Areas. We are concerned that this is impeding the Mayor from using his powers to direct refusal. We consider that the London Plan needs revising to make clear that higher densities may be appropriate but not necessarily in the form of tall buildings.

Providing the homes Londoners need

The London Forum is **concerned** that the supply of housing and especially affordable housing should be maintained.

The proposal in the document that of up three-quarters of all additional households will be one person living alone will need some explanation. It seems unlikely, in view of the high birth rate of immigrants of which many will live in extended family situations. Also, the shortage of homes will result in more co-habitation and sharing of accommodation by young people and families. Policies must support the creation of homes for the elderly in all areas where people live in communities now, with dwellings suitable from independent living through to full care. Such homes could help people to down-size, stay in the area they know and release a four to six bedroom home now being occupied by one elderly person.

The last Housing Capacity Study showed that all housing required can be achieved at an average of the mid point of the range of the density matrix applicable for each site. Architects seem unable to replicate the housing design that made parts of London such as South Kensington of high density and with admirable public realm. That approach to design should be pursued by policy for opportunity and intensification areas, covering infrastructure also.

Planning for all Londoners

The London Forum considers that the London Plan could be more effectively targeted to the needs of particular groups, such as older people, disadvantaged communities and disabled people, in order to improve their quality of life. There should be more emphasis on promoting walkable neighbourhoods; promoting ease of access to people's day-to-day needs, including shops, primary health care through local group practices rather than polycentres and to open space and sports facilities.

The London Forum is also **pleased** to see more recognition given to the need for better facilities for young people, including access to jobs, housing and open space.

Planning for the whole of London

The London Forum supports measures to make better use of untapped or under-used capacity, especially in East London, Outer London suburbs, whilst also improving access to Central London (eg through Crossrail).

In supporting the developments that will happen, the effect of cancelled transport schemes will have to be assessed. Some development areas of London may need transport that will not now be provided, following the Mayor's 'Way to Go' and ten year transport plan, and that will influence the Key Policy Responses.

3. Key Policy Responses

Ensuring London's continued economic success

The London Forum **strongly supports** the principle of ensuring that all parts of London and all Londoners should share in the city's economic success. In particular we support broadening the focus from Central London and the role of financial services and of large firms, to recognising the role of Outer London and of small and medium-sized businesses.

The London Forum **supports** an increased emphasis on both the role of town centres in the rest of London and on the needs of small and medium-sized businesses. This will increase the opportunities for local jobs and strengthen viability and vitality of our town centres. Although London's town centres will not be the locations for international companies, they are the best locations for sub-regional and local business services, for small and medium-sized firms and new businesses.

The London Forum **supports** better coordination to ensure that actions by TfL and the LDA are used more effectively to revitalise town centres. The London Forum welcomes the recognition of links between promoting liveability and high quality of life and ensuring continued economic success. We would, however, go further to stress the potential contribution to reducing the need to travel – a dimension that has not been properly articulated in the London Plan and which the Panel Report proposed should be in this review.

The London Forum supports the Mayor's planning priorities for ensuring London's economic success (except that for tall buildings):

- **To provide a supportive policy and implementation framework for key areas of the London economy:** We do not consider that the current London Plan sufficiently explores the various sectors and the spatial distribution of new economic activity in these sectors. For example, there is a need to distinguish between financial and business services and between those associated with the global functions of London and those that serve sub-regional and local economies within London.
- **To support the success of all London's enterprises:** The London Forum **is pleased** that the Mayor has recognised the role of small and medium-sized enterprises and their role in the London economy. Whilst this is a strategic issue, the

implementation will be local. The London Plan, therefore, needs to recognise this and support policies to improve the supply of premises for such enterprises.

- **To examine ways of ensuring that Outer London can play a full part in the city's economic success:** The London Forum **welcomes** the proposal to set up an Outer London Commission, to help Outer London and especially the network of town centres, to play a greater part in London's economic success.
- **To ensure that a planning policy framework that supports the continued success of Central London:** The London Forum **strongly supports** the development of a new planning framework for the Central Activities Zone
- **To help ensure a diverse, dynamic retail sector:** The London Forum **strongly supports** the priority given to improving the West End and initiatives to make the most of London's rich network of town centres.

We are, however, **very concerned** about the proportion of new comparison shopping floorspace going to major developments outside the existing network of town centres and the impact this is having and will have on existing centres. We are alarmed by the size of Westfield London and the lack of any ceiling on its growth. Other commitments, like Stratford City and the expansion of Brent Cross, will create counter-attractions to the West End and other major centres. We support the Mayor's policy for concentrate new retail, leisure and office developments in town centres and therefore urge the Mayor to resist major retail and leisure developments at out-of-centre locations which are, and will be, poorly served by public transport, such as Battersea Power Station.

Tall Buildings

The London Forum is, however, extremely concerned about that the Mayor considers it a planning priority to support tall buildings, albeit in "appropriate locations" where there are existing clusters.

We consider that Boroughs should be able to determine whether tall buildings make a positive contribution to their area, rather than consider what harm they would cause, which has been the approach in the past.

We can see no reason why it should be a priority to support tall buildings – it amounts to a presumption in favour such developments. This is totally inappropriate and is in danger of pre-empting a crucial analysis of each proposal.

We propose that the priority should be changed to become: "To avoid tall buildings in inappropriate places.." and relocated to the section on "Meeting the environmental challenge".

With many more important economic issues, we do not understand why this has been chosen as a priority. This is not even an economic issue. If no more tall buildings were built beyond those already permitted, this would not be a strategic issue in terms of implementation of the London Plan spatial strategy. London's

economic success does not depend on tall buildings. Other issues in this list, such as the future of the West End, deserve higher priority – this issue should be dropped.

The only reason for covering this issue under economic issues is the underlying assumption that tall buildings might be beneficial to London’s economic growth. There is no evidence to support this assumption. Recent research by the British Property Federation, which sought to prove that there were economic benefits, whilst demonstrating the benefits of agglomeration economies of concentrating economic development in places well served by public transport and with further public transport capacity to support such development, merely demonstrated the benefits of high density rather than high-rise developments. Delivery of these benefits does not require tall buildings.

This latest document seems to be giving more priority to this issue than the London Plan.

The current London Plan:

- says that “the Mayor will promote the development of tall buildings where they create attractive landmarks enhancing London’s character, help to provide a coherent location for economic clusters and/or act as a catalyst for regeneration and where they are also acceptable in terms of design and impact on their surroundings” (Policy 4B.9); and
- identifies certain areas, often Opportunity Areas, where tall buildings may be appropriate (Policy 2A.5; including Paddington (5.34), Euston (5.35), Kings Cross (5.33), Victoria (5.37); Tottenham Hale (5.41); the South Bank (5.107); Elephant and Castle (5.110); Waterloo (5.140); Vauxhall/Nine Elms/Battersea (5.141); and Croydon (5.144).

The London Forum does not consider that there are many circumstances or places where the Mayor should be promoting the development of tall buildings as a genuinely strategic issue. Tall buildings are not in themselves a strategic issue on which the Mayor needs to take a strong policy stance, except where it would impinge upon strategic views. Advocacy is inappropriate.

In many cases, intensification (such as redevelopment at higher densities at Victoria) does not have to mean high buildings – it is making the best use of such locations not whether it is achieved through tall buildings that is the strategic issue. It has been the previous Mayor’s advocacy of tall buildings, reinforced by identifying certain areas as locations where tall buildings may be appropriate, that has generated a succession of applications for tall buildings.

The London Forum considers that the policy for tall buildings needs to be reconsidered. It should:

- **drop the support of tall buildings as a planning priority for ensuring London’s continued economic success:** London’s continued economic success does not rely on the development of tall buildings

- **remove the advocacy of tall buildings** – the word “promote”, despite any caveats about context and design, is incompatible with the Mayor’s quasi-judicial role in relation to specific types of development. “Support” is only slightly better – is there any strategic reason that the Mayor should be positively predisposed to developments involving tall buildings? The London Forum recognises that there are locations where higher- density developments are appropriate (eg near mainline rail termini, such as Victoria), but this should not prejudge whether tall buildings should be supported. It should be noted that that the word “promote” has not been applied to any other type of development in the London Plan – to single out tall buildings for this advocacy is inappropriate;
- **set out the strategic considerations for assessing proposals for tall buildings**, including their impact on views and the skyline;
- **encourage London Boroughs to produce their own policies for the location and scale of tall buildings**; and
- **remove references to locations which the Mayor regards as appropriate for tall buildings, except any that are genuinely strategic in London-wide terms.** The inclusion of these locations prejudices the appropriateness of tall buildings and severely restricts the Mayor should he wish to object to a proposal.

Delivering homes for Londoners

The London Forum recognises that delivering homes Londoners need is not just a planning issue, but consider that more effort should be made to integrate the Housing Strategy and the London Plan.

The London Forum **agrees** that delivering more homes that are affordable by more Londoners will require a more imaginative approach to joint working, including a wide range of stakeholders going beyond the list of statutory sector partners. There is a need for all partners to “own” the responsibility for delivery, so that partnership working can secure its potential for raising the output of housing, particularly affordable housing.

The London Forum, however, considers that targets are still essential, but agreed targets – a contract between the Mayor and each borough which both partners agree is deliverable.

The London Forum **agrees** that quality, design, space standards and amenity space provision are just as important as the numbers. We support an initiative to reintroduce internal space standards similar to Parker-Morris standards for social and affordable housing, to reverse the decline in space standards, and to explore the introduction of minimum space standards for market housing.

The London Forum supports the proposed planning priorities, including:

- **to develop an evidence base on housing needs, capacity and markets:** The London Forum **strongly supports** an evidence-based approach to policy and

implementation, including ensuring openness and transparency and the active involvement of all key stakeholders, including the voluntary sector. We welcome the current arrangements for participation in the Housing Capacity Study, the Strategic Housing Land Availability Assessment, and the Strategic Housing Market Assessment, in assessing performance of the Density Matrix and in monitoring output performance.

- **to work with boroughs to identify ways of improving the supply of housing and to ensure a supportive policy framework for delivery:** The London Forum **supports** working with boroughs to bring vacant housing back into use, including flats over shops, and increasing densities where appropriate, such as at public transport nodes and town centres. We consider that more work is needed to define appropriate density ranges for mixed-use development around town centres, where densities based on floor area ratios rather than housing densities in terms of habitable room or dwellings per hectare. There is a tendency for developers to seek a density at the top end of appropriate density range for the site in addition to the non-residential uses on the lower floors. The London Forum supports planning policies which recognise the need for more homes suitable for families, particularly in the affordable sector. The market sector already contains a lot of stock which would be suitable for families, but which is occupied at a low occupancy rate by small households. Delivering larger units in the market sector does not, however, mean that these will reach families. Trickle down does not work in the market sector – large units are mainly bought by small households.
- **to support the delivery of affordable homes:** The London Forum **supports** the Mayor's commitment to securing 50,000 new affordable housing between 2008 and 2011, but considers that the Boroughs should still be trying to achieve the maximum that is reasonably possible by attempting to ensure that as close as is possible to 50% of new housing is affordable. We consider that it is the nature of the target – an aspiration rather than prescriptive target – that needs to change, whilst all the stakeholders are trying to achieve the best result in terms of the mix of the outcome. The London Forum welcomes the recognition to give priority to family-sized housing, but considers that more consideration needs to be given to the space standards for affordable housing.
- **to ensure a supportive planning policy framework for Mayoral housing initiatives:** The London Forum **supports** greater integration between the London Plan and the Housing Strategy;
- **to improve standards for the quality and design of housing:** The London Forum **supports** the move to higher standards and the need for greater flexibility so that housing can be adapted to changing lifestyles.
- **to promote good quality, liveable and sustainable neighbourhoods where people can enjoy a high quality of life:** The London Forum **supports:**
 - designing out crime
 - protecting back gardens from unsuitable development
 - ensuring neighbourhoods have access to play, sport and recreation, including protecting and enhancing our playing fields

- o addressing the particular needs of older people and encouraging lifetime homes.
- **to prepare and publish revised supplementary planning guidance on housing:** The London Forum **supports** the production of new supplementary planning guidance.
- **to prepare further alterations to the London Plan:** The London Forum **supports** the need to bring forward revisions to the housing section of the London Plan. We look forward to the proposed seminar to explore these issues.

Allowing all Londoners to enjoy their city in safety:

The London Forum supports the planning priorities design and safety:

- **to issue further guidance on designing out crime and anti-social behaviour;**
- **to consider what can be done about the existing built environment**
- **to ensure supportive planning policies for facilities and uses linked with community safety and criminal justice**

Managing the environmental challenge

The planning priorities are supported but we want to see action initiated to improve the energy and water savings and climate change adaptation for the existing building stock.

The London Forum supports the planning priorities:

- **to make real progress in meeting the challenge of climate change:** The London Forum **strongly supports** the Mayor's commitment for London to be a world leader on tackling climate change. We are particularly concerned about greenhouse gas emissions and will expect the revised London Plan to emphasise much more strongly the need to reduce the need to travel, especially by car;
- **to ensure that the most is made of opportunities to use the planning system to promote the most efficient use of resources:** The London Forum **supports** greater use of renewable energy, the use of low carbon energy options, especially district heating systems where this is possible.
- **to make sure the planning system protects and enhances open spaces:** The London Forum **strongly supports** the Mayor's commitment to prevent inappropriate development of open spaces, the Green Belt, Metropolitan Open Land, domestic gardens and playing fields. We look forward to the strengthening of both the supplementary planning guidance and the London Plan policies.

We regret, however, that the Mayor has not given priority to greater protection for London's greatest open space – the Thames – from inappropriate development both in the Thames and in the Thames Policy Area. London should be ashamed of the

legacy of the last 15-20 years – we must get a stronger set of policies, but, more importantly, firmer implementation of existing policies to protect what remains of our legacy.

- **to make sure the planning system does all it can to protect and promote trees and woodland:** The London Forum **welcomes** the Mayor's commitment to this issue, but recognise that his role is mainly to provide a good example along his own roads, provide good practice advice for protecting existing trees and planting new ones. Nevertheless, we welcome the focus he has put on this issue and hope that this will raise awareness among those boroughs that have not previously given this issue priority.
- **to promote a well-designed environment that respects and makes the most of London's heritage:** The London Forum **strongly supports** the priority that the Mayor gives not only new architecture and design, but also to preserving and enhancing our heritage. We particularly welcome the steps he is taking to protect and enhance the view corridors and strengthen the protection of London's designated World Heritage Sites.

But we want him to go further, large new buildings that impinge upon designated views should not be assessed in terms of how much harm they do, but whether and how they enhance the view. The test for such buildings should be the same as for contributions to conservation areas or the setting of listed buildings – do they preserve or enhance the view, not how much harm can you get away with! It is time to raise the bar. We look forward to London Plan Policy 4B.18 (Assessing development impact on designated views) actually being used for the purpose that it was designed. We remain very concerned, however, about the priority the Mayor gives to supporting tall buildings for “economic reasons”. This priority needs reassessing.

- **to protect and enhance London's historic environment:** The London Forum **particularly welcomes** the Mayor's emphasis on London's historic heritage – a subject that, although there are policies in the current London Plan (4B.1; 4B.11; 4B.12; 4B.13; 4B.14; 4B.15; 4B.18), appears to have been given less weight in the last Mayor's dash for growth, high density and tall buildings. We expect the Mayor to redress the balance and, therefore, welcome the priority he gives to this subject.

Keeping London Moving

The London Forum strongly supports the Mayor's recognition that the planning system should be ensuring development is located in the right place which will help reduce the need to travel, especially long distance and by car. The next version of the London Plan needs to set out more explicitly the need to reduce the need to travel by ensuring that major trip-generating uses are built in places which are, or will be, well served by public transport (such as existing town centres), exploiting wherever possible existing capacity, and reducing the need to use cars.

The previous transport strategy recognised that we cannot build our way out of our transport problems – whether through roads or public transport – and need to rely more on demand management. This thinking needs to be extended to how we plan for the location of development. We support the Mayor’s commitment to a more integrated approach to land-use and transport planning.

The London Forum supports the planning priorities:

- **as a priority, looking at ways of using the planning system to seek a contribution towards the cost of Crossrail from development:** The London Forum in principle supports the use of Crossrail as an opportunity for regeneration, but considers that this should not be at the expense of town centres.
- **to ensure that decisions on new development, transport infrastructure and funding are taken in a coordinated way:** The London Forum **supports** this approach.
- **to oppose the current plans for a third runway at Heathrow Airport:** The London Forum **strongly welcomes** the Mayor’s support for Londoners opposing the expansion of Heathrow. We are unconvinced by the “economic” arguments, both in terms of meeting unfettered demand or the assumed value put on the hub function of Heathrow. We **strongly support** the Mayor’s proposal for a through review of long-term options
- **to ensure a strategic planning policy framework supportive of cycling and walking:** The London Forum **strongly supports** the headline message but regrets that the Mayor has not maintained the key element of a long-term strategy to make London a world-class city for walking. We welcome the Legible London initiative, but consider that the big-picture message must be the headline priority.

The London Forum **wishes to encourage** the Mayor to introduce a bicycle hire scheme similar to those in Paris, Barcelona, Brussels, Lyon, La Rochelle and others.

It would be helpful to have a policy for more cycle parking in the vicinity of stations.

- **to support use of the River Thames and other London waterways for the transport of people and goods:** The London Forum **strongly supports** the protection of wharves and other infrastructure, not only on the Thames but on other waterways and urges the Mayor to extend his direction to include the main canals. We would welcome additional guidance and best practice to support the protection and use of waterways.

We support more initiatives to improve wayfinding for pedestrians but we would like to see more development and promotion of the bus system. Higher frequencies on some routes would remove the travellers' prejudice that buses are only for children and elderly people. Better route maps of buses are required so that people can plan a trip and interchanges just as they would using the Underground.

Planning for London's diverse places

The London Forum supports the planning priorities:

- **to continue to promote the development of East London and the Thames Gateway as a priority areas for development and regeneration:** The London Forum **supports** the Mayor's approach to working with stakeholders in planning East London and the Thames Gateway. Crossrail may well create more opportunities, but the route in is also the route out and care must be taken that new communities are not just commuter suburbs but sustainable places with their own identity, not just places to accommodate the housing numbers. We agree that we must not create new communities that are dependant upon the car.
- **to ensure that new communities are just that and not simply large housing estates:** The London Forum is concerned that there is insufficient understanding of the thresholds for producing viable social and commercial infrastructure. In the absence of any capacity in the London boroughs to undertake this research, we suggest that the Mayor should commission a study that will provide a more realistic assessment about what is needed to support schools, primary health care, post offices, libraries, sports facilities, shops, leisure facilities, etc to ensure that there is realistic understanding about how to create and maintain these services, both in new communities and in existing ones.
- **to ensure that realistic plans are in place to make the most of the legacy from the 2012 Olympic and Paralympic Games**

We expect area action plans and OA/AI planning frameworks to specify the local infrastructure facilities required and the land needed for them.

Key Questions:

The London Forum supports the majority of the policy priorities identified, **except the priority given to supporting tall buildings** – there is no evidence that tall buildings (as opposed to building at higher densities in areas well-served by public transport and with spare capacity), has any economic benefits, whereas there are plenty of examples where they adversely affect the setting of World Heritage sites, strategic views and sensitive areas, such as the Thames. **The priority should be reversed – to avoid tall buildings in inappropriate places.**

The London Forum **proposes** that the Mayor commissions research to commission research on the economic implications, positive and negative, of increasing the agglomeration of economic activities and, if beneficial, the best way to accommodate such economic growth in terms of location and building type.

4. Making it Happen

The London Forum recognises that the Mayor proposes both a change in style and a change in priorities.

Much can be achieved in terms of outcomes with a change in style – a less interventionist and consensual approach. The London Forum strongly welcomes this and recognises that even an unaltered London Plan could deliver a different set of outcomes.

We agree that Supplementary Planning Guidance is very useful in helping boroughs, developers and communities to understand and interpret the London Plan, and welcome proposals for further guidance.

We consider that there is a need for a review of the London Plan to:

- **change the emphasis of some policies to produce better outcomes;**
- **reflect new and emerging priorities;**
- **remove or relieve policy stress; and**
- **move faster in the direction of more sustainable urban development – harnessing change to retrofit existing areas and create a more sustainable pattern of development.**

Some changes in emphasis could be achieved through changing a few words that would reduce the pressure on “**maximising**” densities and “**promoting**” tall buildings, both of which have created huge pressures on communities and London’s townscape and skyline. **These words are largely unnecessary** as:

- **the Density Matrix – which we strongly support – already specifies “appropriate density ranges”** which seek to make best or most efficient use of land – the use of “maximising” has resulted in densities often greatly in excess of these densities. If the density matrix is used sensitively there should be higher densities but appropriate to the context. Maximising is not necessary once boroughs adopt their own density policies in general conformity with the London Plan density matrix – its retention is potentially damaging and encourages developers to try to bust the envelope; and
- **promoting tall buildings, despite the caveats, is unnecessary** as there are few if any economic benefits and the aesthetic and promotional benefits range from debateable to dubious.

We have indicated that more emphasis is needed on:

- **reducing the need to travel**, especially by car, as a guiding principle; and
- **more sustainable suburbs based on a stronger network of centres** which are the focus for social and commercial infrastructure development.

This will require retrofitting the London Plan policies that these changes would affect.

The next alterations to the London Plan should address any inconsistencies introduced by the alterations in 2006 and 2007. The evidence of the EiP participants and the content of the 2007 Inspectors' report refer to changes that it was claimed needed to be made to parts of the Plan that were not being altered. Those were not able to be taken into account by the Inspectors.

For “promoting social inclusion and tackling deprivation and discrimination” (page 9) the London Plan will need strong focus on the urban renewal required in areas of sub standard social housing, run-down public realm, low quality environments, overcrowding and deficiencies in local infrastructure, social facilities, open spaces and services.

If the London Plan is to be altered next year just for funding Crossrail, that would seem to be a narrow aim and a lost opportunity to address the problems outlined in the document and by ourselves. It is not clear what is meant by the phrase on page 34 that "alterations will be in place for formal publication towards the end of 2010." If it is meant that the altered version of the plan will be approved and in operation by that time, then that is too late for addressing the housing, design, economic and environmental issues that 'Planning for a Better London' and the experience of our community group members have identified.

Supplementary Planning Guidance

The London Forum welcomes the forthcoming consultations on further supplementary planning guidance.

The eighteen month timescale described is very long for finalising additional guidance that would become material consideration and clarify the interpretation of London Plan policies and content. That would imply 2010 as the year for some of the important SPGs proposed on town centres, retail, leisure and CAZ. SPGs on Outer London and Waterways may not appear until 2011 by which time a full review version of the London Plan will be in preparation.