

**London Sustainable Development Commission (LSDC)
Consultation submission on the Draft London Plan, January 2010**

1. Introduction

The London Sustainable Development Commission (LSDC) was established in 2002 to advise the Mayor of London on ways to make London a sustainable, world-class city. The Commission is an independent body advising, supporting and challenging policy makers to promote a better quality of life for all Londoners, both now and in the future, whilst also considering London's wider global impacts.

The LSDC is grateful for the opportunity to comment on the draft London Plan. As a 'critical friend' to the GLA, the LSDC has an important role in promoting sustainable development in London and advising on the sustainable nature of London wide strategies. The comments below on the London Plan should be read in conjunction with those on the Economic Development Strategy and Mayor's Transport Strategy. (See attached responses)

There are many topics covered by the London Plan where the drafting has taken forward policies and proposals that the LSDC is able to support. These are referenced in the main body of this paper.

There are, however, two major areas of concern identified in this paper:

- The need for a ***clearer vision*** of what London could be like in 2031 in order to provide the GLA 'family', the London Boroughs, developers and owners, and local communities with a context for their own activities and commitments.
- The need for greater clarity on how the ***implementation of change*** will be achieved, so that the responsibilities of the GLA, the London Boroughs and others can be identified in policies and proposals and tested over time.

These concerns are based on several strands of research that the LSDC has been able to pursue over the last year, and which underline ***the importance of fundamental change***:

- Quality of Life Indicators¹: the report, published in June 2009, indicates that there are two fundamental long-term issues that need to be addressed – the consumption of resources and the resulting drag on the economy, and the eroding of community cohesion.
- Sustainable Consumption and Production²: the report, published in November 2009, clarifies the range of changes that need to be undertaken in the cycle of production and consumption to reduce carbon dioxide emissions and London's carbon footprint, including issues related to embodied energy in buildings and waste production and reuse.

¹ http://www.londonsdc.org/documents/qol_reports/QoL_indicators.pdf

² <http://www.londonsdc.org/documents/research/Capital%20Consumption.pdf>

The LSDC is expecting to use the research undertaken as a basis for discussion with interested parties over the next few months and should it be required, will be in a position to take an active role in the Examination in Public (EIP) on the London Plan in order to present these findings.

At this stage we suggest in the sections below how the vision for London could be strengthened, and outline the changes in policies and proposals that could support the realisation of that vision.

2. Vision and Objectives

The LSDC considers that the six objectives provide a useful guide to what the Mayor hopes to achieve through the London Plan. However our contention is that the vision needs to state more clearly what London would be like if these objectives were to be achieved.

The LSDC vision for London is for London to be the global benchmark for sustainable development by 2020. The Commission would like to see the London Plan vision being articulated along these lines.

The vision would need to clarify how London could ***function as a whole in a low carbon future*** and in relation to its wider hinterland:

- The use of virtuous cycles of resourcing, production, delivery, consumption and re-use within ***main stream businesses and the wider economy***,
- The role of a wider range of skilled and semi skilled jobs and training and research to ensure that the ***opportunities for innovation*** are developed in this wider context, as well as to support new green businesses.

The vision should also clarify how London would function more sustainably, so as to improve the ***quality of life*** of all who will live and work there. This means describing the elements of daily life that will be changed over the next two decades:

- How ***all homes*** will be energy efficient and able to deal with issues such as water use, heating and cooling needs;
- How improved ***social and economic infrastructure*** (including water, waste treatment, food, energy generation and supply, IT networks) will tackle inequalities;
- How ***green spaces*** as part of the green grid will serve multiple functions in terms of recreation, urban cooling, flood containment, food growing;
- How ***neighbourhoods*** will provide for the full range of local needs in terms of social facilities, shopping, waste reuse and energy production;
- How ***main centres*** will provide for a full range of employment and recreation that can be easily accessed by non-car modes, with appropriate servicing to limit carbon production.

It will also be important to provide a spatial vision of how the:

- ***Different areas of London*** will function, particularly the areas of greater current deprivation (mostly in inner London) and those with major change reflecting opportunities (particularly in outer London);
- ***Opportunities in inner London*** will be manifested in decentralized energy networks, mixed use of open space, improved public realm;
- ***Opportunities in outer London*** will include differentiated roles for different centres reflecting specific strengths, infrastructure for serving local markets and new business opportunities, improved access to local employment and recreation.

We believe that unless there is a clear vision of this kind it will not be possible to place the different policies, proposals and initiatives in context, or inspire the wider changes in business practice and personal behaviour that will be necessary to enable implementation of the Plan.

The LSDC would be happy to meet with the London Plan team to discuss the overall vision for the London Plan and how the LSDC may be able to assist in the development of further sustainable options and policies for London.

3. Policies and Proposals

Many of the individual elements of a Plan to address such a vision are already in place. There is mention of a wide range of the policy initiatives that will help to realise the vision and objectives.

However, the need is for a review of the policy framework to consider:

- The clarification of policies and proposals to enable them to be implemented more widely in order to meet the major challenges in terms of the changes that are needed.
- To identify more precisely those who will be expected to undertake the implementation, and how their performance will be assessed during the life of the London Plan.

This section of the paper examines each of the main chapters of the draft London Plan in order to identify where alteration might be effective.

Chapter 2: London's Places

The main new element of the Plan is the addressing of issues in outer London. The LSDC welcomes the expression of the strategy (Policy 2.6), and the consideration of the economy and transport issues in outer London (Policies 2.7 and 2.8). There are, however two concerns:

- There is insufficient clarity on how proposals will be developed. Under Policy 2.16 there is mention of the types of developments that might be appropriate in different outer London development centres, but it would be helpful to ***establish a***

mechanism along the lines of the arrangements used by the Outer London Commission by which Boroughs in each sector of outer London will identify specific opportunities in their town centres and elsewhere (in conjunction with the wider sub region) for inclusion in their Borough Plans.

- There is a lack of clarity on the opportunities for ensuring that outer London growth will be accessible by non-car modes. We understand that it has not been generally possible to identify with the Boroughs a critical mass of development that would enable significant public transport improvements to be funded. It would be helpful to ***identify the criteria for public transport improvements*** that would need to be met to link with and maximise the benefits of Cross Rail, as well as through new tram systems such as the successful Croydon tram system, elsewhere in outer London (see also comments on Chapter 6).

Chapter 3: London's People

The proposals in relation to housing are of particular significance. The LSDC welcomes the policies related to optimising housing density (Policy 3.4) and the development of space standards (Policy 3.5) especially when these are extended to private sector developments. There is no disagreement with the overall housing supply target (Policy 3.3). However, there are two concerns:

- There is an overall reduction in the target for affordable housing (Policy 3.12): the total of 13,200 is the equivalent of 40% of total new stock i.e. 10% less than the expectation in the previous Plan. When this is coupled with the greater emphasis on 'intermediate' housing there could be significant under-supply to meet social housing needs. There is need for ***an examination of the implications of the changes to this policy.***
- There are no affordable housing targets for individual Boroughs (Policy 3.12): the concern is that (despite Policy 3.10 on mixed and balanced communities) there will be a tendency for social housing provision to be further concentrated in the inner London boroughs. There is a need for the London Plan to set out ***criteria for Boroughs to use*** in deciding their affordable housing figures.

Chapter 4: London's Economy

The LSDC has concerns that the LP does not set out a compelling vision of how London's economy will operate consistent with sustainable development principles and practice and the steps necessary to reach the stated aim. Indeed similar to the EDS the LP sets out a vision that is awaiting a return to pre-recession activity without considering how the economy and the resulting land use implications need to operate to avoid both future shocks and economic progress, which is consistent with social and environmental needs.

The main concern in this chapter is therefore, that there is limited coverage of the steps needed to achieve a low carbon economy. The LSDC welcomes the reference to the low carbon economy (Policy 4.1). However the emphasis is on provision for green industries (Policy 4.10), rather than on the major changes needed in all sectors of the economy. The

issue needs to be addressed fundamentally in the Economic Development Strategy (see the separate LSDC response), but there are major implications for the London Plan:

- The LSDC believes there should be a major change in the way the economy works and it will be important to provide ***the infrastructure to enable this change***. This will involve close working with business groups and the community to identify needs and spatial requirements for e.g. servicing, remanufacturing and waste reuse. The opportunities related to different uses in business parks and industrial sites may require new policy as well as changes to existing policy (for instance Policy 4.4 so as to retain appropriate sites for low carbon infrastructure).
- There will also be ***need for a full range of facilities to enable new skills to be developed*** to support change in all the economic sectors. Again close working with business groups already innovating (e.g. Green 500) will identify needs and may require additions to policy (for instance to Policy 4.12 on improving opportunities for all).

Chapter 5: London's Response to Climate Change

The retention of the target for reduction of London's carbon dioxide emissions of 60% (below 1990 levels) by 2025 (Policy 5.1) is welcomed; as are policies covering the innovative approach to decentralised energy networks including the 25% target (Policy 5.5), energy technologies e.g. for electric vehicles (Policy 5.8), and greening (Policies 5.10, 5.11). However it is going to be important in the context of London's continued growth to increase the momentum of change if the overall CO₂ target is to be met and clarify how other targets will be implemented:

- The relegation from policy of the 20% carbon dioxide reduction target through on-site renewables (paragraph 5.43) is understood to be in response to the expectation that there will be more efficient ways of delivering carbon reductions (Policy 5.7). It would however be helpful not to lose sight of the market benefit the 20% renewables target gave to the acceleration in that technology both in terms of increasing demand and reducing costs. In addition it would also be helpful to translate the general targets for the alternative energy sources (Table 5.1) into ***more specific renewables targets and guidance*** within the London Plan in order to help implementation by the London Boroughs and developers. A report by London South Bank University indicated that the energy policies in the planning system are only just having an effect and therefore it is unlikely a relaxation in the target is going to support matters³.
- The importance of retrofitting (Policy 5.4) could be more fully addressed by including in the Plan more emphasis on the expectation that each Borough will be ***identifying criteria for selecting areas of opportunity for retrofitting***, that will cover energy efficiency, sustainable transport, water and waste; and that the

³ Review of the impact of the energy policies in the London Plan on applications referred to the Mayor (Phase 2) FINAL REPORT, July 2007 - <http://www.london.gov.uk/mayor/planning/docs/lbsu-research.pdf>

Mayor will be exploring the potential role of private sector finance to assist in implementation.

Chapter 6: Transport

The main issue is the continued need to change travel behaviour (particularly in areas where there is current dependence on car use). There are many policies that are helpful including those on cycling and walking (Policies 6.9 and 6.10), aviation (Policy 6.6), and rail freight interchanges (Policy 6.15). However the LSDC is concerned that there are some areas that need strengthening (see the response to the Mayor's Transport Strategy) and these should be reflected in the London Plan:

- The greater emphasis on growth in outer London with its greater car dependence is of particular concern. There is need to **prioritise funding of improved public transport** on the 'hub and spoke' principle to service growing outer London town centres. Identification of specific centres for which a Croydon type tram service would be appropriate should be a priority (See also comments on Chapter 2).
- There is continued need when considering development proposals, to enable **reduction in the need to travel**. It would be useful to add a policy that makes clear there should be consideration of change in travel behaviour in relation to **retrofitting** as well as new developments. (See also comments on Chapter 5).
- Those who live in the most deprived areas of London suffer a disproportionate number of road casualties and poor air quality. It would there be useful for policy 6.12 (section *Be* on safety) to include reference to **priority being given to safety and air quality issues in the most deprived areas of London**.

Chapter 7: London's Living Places and Spaces

There is much policy in this area that LSDC supports, for instance in relation to the inclusive environment (Policy 7.2) and blue ribbon network (Policy 7.24). There are however policy areas where there are concerns:

- On air quality (Policy 7.14) there is need for greater clarity on how the London Plan will achieve **mitigation of the high concentrations of PM10 and NOx** and meet legal commitments and obligations with the potential for extension of Low Emission Zone concept requiring further consideration.
- On green space there is more that can be said on **land based economy** including the wide range of benefits of, for instance, land for food (Policy 7.22) in relation to social cohesion as well as local food supply.
- The LSDC consider that there is a lack of clarity on the **natural character** of London e.g. heath lands, marshlands, natural geology. It is not clear from the plan that where regeneration happens this natural character would be retained and enhanced.

4. Conclusion

Our view is that a clearer long term vision of what London could be like in 2031, and re-consideration of some of the key policy areas described above would make a significant difference to the ability of London to meet the six objectives of the London Plan.