

LONDON SUSTAINABLE DEVELOPMENT COMMISSION (LSDC)

RESPONSE TO DRAFT OLYMPIC LEGACY SUPPLEMENTARY PLANNING GUIDANCE (OLSPG)

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 Commission is grateful for the opportunity to provide the following comments on the Draft Olympic Legacy Supplementary Planning Guidance.

2. LOCAL COMMUNITIES

2.1 Potential legacy

One of the main objectives of the Olympic bid was to provide a means for improving quality of life and initiating major sustainable regeneration in East London. Sections 3 and 4 of this note examine the wider issues, including at Borough level.

Communities adjacent to the Olympic Park are among the most deprived in London, and there has been an expectation that there would be significant direct benefits for these communities in terms of access to jobs, a wider range of housing, open space, recreation and other facilities.

At the same time there is concern that sites that are subject to an advantageous regime in terms of investment opportunities and proposals, can redirect development and improvements away from adjacent areas. This has been true in the past of some Enterprise Zones, and it needs to be borne in mind in the context of the Mayoral Development Corporation being established only in the central part of the OLSPG area.

The LSDC wishes to ensure that there is clear enough guidance in the OLSPG to enable the Olympic Park and its associated developments to become an integrated part of the local urban fabric and the life of the adjacent local communities.

2.2 Information and analysis

An understanding of the needs and aspirations of the local communities provides the basis for developing appropriate guidance. At the time of writing this note the Delivery Study is not yet available. The OLSPG, in relation to social infrastructure, indicates that the Delivery Study 'will assess existing provision across the OLSPG area' (page 23).

The current draft of the SPG gives little indication that any such assessment has influenced the development of guidance. Only education is given any consideration (page 23 and figure 2.A.3), and even here there is currently no indication that there is any co-ordination with the needs of the existing communities and existing provision.

This lack of consideration is particularly clear in the section covering retail provision where there is no mention of local shops (page 25 and figure 2.B.1). There is no mention of other local facilities such as leisure or health, or of local open space and allotments, all of which will be of major significance to the adjacent local communities.

The LSDC expects there to be evidence that:

- These issues have been given consideration in the Delivery Study assessment, and taken through into the next draft of the OLSPG.
- Local community consultation has been used in the preparation of the OLSPG, at least through liaison on specific issues with the London Boroughs or more directly with the communities.

With regard to the second point it is notable that the Olympic Park Legacy Company has made extensive use of local consultation in developing its proposals. Issues such as co-location of services, and support for local food production and processing on a significant scale have been identified (Statement of Participation Volume 3 pages 179 – 180).

The SPG does refer to the London Plan policy 3.7, which suggests that such analysis and consultation should take place as part of the development of proposals for larger sites (page 23). However unless some overview is provided in the OLSPG, it will be very difficult to assess whether proposals are assisting the existing communities.

2.3 Outcomes and targets

The LSDC suggests that there should be a clear analysis of the needs and opportunities in the existing adjacent local communities to include: the mix of existing housing and housing needs; range of existing local employment opportunities and skills; and the extent of social and other provision (including schools, leisure, health, open space, allotments, local shops and services), in relation to needs.

It would then be possible to map the potential outcomes for each of the local communities in terms of:

- the potential for sharing facilities (leisure, health, education) with the newly developed areas and the improved connectivity that could enable that shared use;
- the network of existing and potential facilities (including local shops and local open spaces) and how these could relate to the local housing and link to the wider area; and
- the additional provision of housing and jobs that could be accessible to local people.

On this basis it will then be possible to assess how far the development proposals address the desired outcomes.

The outcomes could, where appropriate, be translated into local targets related to *convergence* (see section 3 below) and *sustainability* (see section 4 below). The LSDC considers that it is important to consider how local communities are impacted in terms of both these issues. It would, for instance, be

possible to address the targets for convergence by attracting into the immediate Olympic Park area a population with above average London characteristics for health, and to do so without having any tangible effect on the existing local communities. The Commission feels it would be better for these convergence targets to be met by policies, projects and facilities that help the existing communities.

The LSDC suggests that it is vital that the OLSPG makes clear what new development is expected to do, for instance, in providing flexible community facilities or specific allotment space.

The LSDC recommends that the next iteration of the SPG specifies what is expected in terms of impacts on the adjacent local communities so that there can be a framework for assessing the direct benefits of future development in terms of a legacy that will be experienced by the existing population.

3. CONVERGENCE

Environmental justice is, in short, ‘No less than a decent environment for all, no more than our fair share of the Earth’s resources’ (Friends of the Earth, Scotland). It is about three things: the right to a healthy environment, including a safe and healthy place to live; no disproportionate negative impact of policies, acts or omissions on minority or indigenous groups, and equal access to environmental information, participation, decision making and justice.

In this section we identify aspects of the SPG that need to be strengthened in order to reduce environmental inequalities suffered by London, and indicate how these will relate to Londoners’ health.

The Commission proposes that the Convergence indicators should include environmental indicators as they have an impact on the health of people living in the area.

The LSDC recommends that the next iteration of the SPG includes environmental indicators on design quality; road traffic and air quality; open spaces and biodiversity; and carbon emissions and adaptation to climate change, which would have the highest impact on the health of those living in the area.

3.1 Design Quality

Research shows that there is a direct relationship between the quality of the built environment in which we live and work, and our quality of life. In order to engender ‘relaxed and good-humoured’ Londoners there is a need to focus attention on the design quality of our urban fabric¹. ***The LSDC supports the guidance outlined in the London Housing Design Guide² and recommends that this should be reflected in the convergence criteria.***

3.2 Road traffic & air quality

Children in deprived communities are three times more likely to be hit by a car³. Asian children are involved in up to twice as many pedestrian accidents than the national average. The Mayor’s Transport Strategy is unequivocal: those who live in the most deprived areas of London in ethnic

¹ <http://www.cabe.org.uk/articles/grand-designs>

² <http://www.london.gov.uk/who-runs-london/mayor/publications/housing/london-housing-design-guide>

³ <http://www.ippr.org/press-releases/111/2703/lewis-hamilton-we-need-a-global-decade-of-action-for-road-safety>

minority groups suffer a disproportionately high number of road casualties. There is evidence that strong partnerships between agencies interested in health and road traffic reduction can be very effective. The Bristol partnership⁴, for instance, specifically explores the relationship between transport and health.

Land use planning has a role in reducing traffic accidents and improving air quality and is a major corner stone in decision-making in Northern Ireland⁵. Given the Mayoral ambition to improve quality of life and reduce inequality, environmental justice implications should be considered in planning decisions. ***In particular we recommend that the convergence criteria should include an assessment of air quality.***

3.3 Open Spaces and biodiversity

Similar to the information provided above, there is evidence from the LSDC's 'Sowing the Seeds' report⁶ that there is a correlation between the overall health of a community and the provision of good quality open spaces with high levels of biodiversity. The evidence is strongest for claims about health, both physical and mental. There is also good evidence of a link between time spent in natural settings as a child, and positive views about nature as an adult. The report also suggests that natural environments lead to an improvement in the quality of children's outdoor play, and to improved self-confidence, language/communication skills and psychosocial health. ***The LSDC therefore recommends that open space provision should be included in the convergence criteria.***

3.4 Carbon emissions and adaptation to climate change

There is a priority need in London to reduce poverty, including fuel poverty. Programmes that work with vulnerable and deprived communities need to identify how to better design and improve access to services that alleviate fuel poverty and identify how to tap more effectively into the values of London's multicultural society.

It is therefore not simply an environmental imperative that the communities adjacent to the Olympic Park are supported to reduce their carbon footprint. ***The LSDC is therefore recommending that carbon emissions per capita should be included in the convergence criteria.***

4. SUSTAINABILITY AND INNOVATION

4.1 Setting new standards

A promise of regenerating the Thames Gateway was that in seeking to re-balance London, advantage should be taken of underused land in East London to match some of the economic success and social conditions of West and Central London. The zone was expected to set and adopt new standards and draw on lessons to help avoid many of the problems associated with the pattern and form of development of those established areas.

⁴ <http://www.idea.gov.uk/idk/core/page.do?pageld=10660318>

⁵ http://www.doeni.gov.uk/index/protect_the_environment/local_environmental_issues/environmental_justice.htm

⁶ <http://www.londonsdc.org/lscd/research.aspx>

Furthermore, lessons from the planning of the Olympics/Paralympics add to the rationale for the OLSPG to develop a legacy that succeeds because it avoids replicating the problems of West and Central London.

For the success of Development Principles A1 (building well connected lifetime neighbourhoods) and C2 (improving local connectivity and permeability), the LSDC suggests that the Olympic Legacy should be advanced in ways that avoid and indeed make a distinct break from merely seeking to match West London's development patterns.

For instance, the legacy must avoid West London's high level of car dependence and the consequential congestion, health, social and economic inefficiencies this entails, which may have been hallmarks of success in past decades, but should not be taken as an aspiration standard for legacy purposes.

The LSDC recommends that the SPG requires a more thorough approach to sustainability than contained so far in 2.E (sustainable development) and that it should go beyond the broad treatment of energy, flood and waste measures covered so as to convey a longer term approach to the area leading to new standards related to economic, social and environmental sustainability that build on the lessons from the planning for 2012 and actively avoid the development path taken to date by the rest of London.

4.2 Innovation

We have indicated that we are concerned that the approach to sustainable development articulated in the SPG would imply that economic sustainability could be achieved at the cost of social and environmental sustainability. From our experience this would present a false trade off, with poorer communities suffering disproportionately.

Similarly, whilst we celebrate the innovation that London has attracted over the past 11 years (as London's policies have led to substantial inward investment), the LSDC has concerns that should specific sustainability targets (and environmental ones in particular) not be clearly articulated, the level of innovation that London has enjoyed to date, may falter.

The LSDC commends the aspiration in the SPG to promote a more resilient localised economy through the development of a vibrant 'sustainable' quarter of London

The assessment to date is that the London Plan had made a significant contribution to the development of London's Green sector. In 2009 London South Bank University completed a study which indicated that the Mayor's climate change mitigation and energy policies in the London Plan have been successful in significantly reducing energy consumption and CO₂ emissions in new developments, and go well beyond the national requirements set out in the 2006 Building Regulations - Part L. The planning policies in London were specifically backed up by a suite of materials, guidance and training that supported developers, planning officers and the public. This ensured that the impact of the policies were maximised.

The excitement engendered by London's new green policy contributed to the success of London's bid for the 2012 Olympics. Indeed development in London has changed as a consequence of the

leadership that London has shown. In March 2009 the London Development Agency produced its Green Prospectus⁷. It concluded that through the retrofit work, recycling, electric vehicles and decentralised energy, London can seek to benefit from 14,000 jobs and £600m pa GVA. The report concluded that this would be the area where planning could be supported, and fiscal incentive could be put to best advantage.

Since the publication of the prospectus, inward investment to East London has been particularly successful. Notably Siemens is housing their new sustainability centre in the Royal Docks. Andreas Goss, CEO of Siemens, acknowledged the key driver in coming to London was to celebrate 'London's ambition and leadership in green technologies'.

In order to ensure that current progress in reducing our carbon footprint is sustained and ensuring that we successfully adapt to the effects of climate change; the SPG would need to give clearer guidance to developers on how to achieve this. It is unclear how the current momentum on internal investment, development and innovation that has begun in London, could continue without clear political will and guidance.

In order to maintain the level of innovation and excitement that London has enjoyed over the past few years, the LSDC recommends that the next iteration of the SPG includes a clearer identification of how innovation in the low carbon economy will be encouraged.

⁷ http://www.lda.gov.uk/Documents/Prospectus_for://_London,_the_Low_Carbon_Capital_5608.pdf