

FIRST REVIEW OF THE LONDON PLAN: SCENARIO DEVELOPMENT AND POLICY TESTING PROJECT: HIGH LEVEL SCENARIO TESTING

COMMENTS BY THE LONDON FORUM OF CIVIC AND AMENITY SOCIETIES

As a contribution to the consultancy project being undertaken by Berkley Hanover Consulting the London Forum of Civic and Amenity Societies (London Forum) considers that there are a number of critical uncertainties and risks that affect the delivery of the London Plan which need to be tested as part of the sensitivity testing in the scenario exercise.

The key issues that we would like to see tested are:

1. Population Growth:

- a lower international immigration; and
- a higher rate of out-migration to the South East and other regions.

The implications of these possibilities should be tested.

2. Economic Growth

Some of the assumptions in the current London Plan are potentially overoptimistic – these include:

- the implications of growth rates lower than 2.5% need to be tested, including 2.25% and 2%;
- jobs in business services needs to be tested to established to determine whether all these jobs involve the need for office/workplace floorspace, especially whether these need to be in the Central Activities Zone, Isle of Dogs and Opportunity Areas and how much will need to distributed more locally; and
- the effects of changing space requirements in offices over the period of the plan, for example the effect of a 1% pa increase in productivity in the use of space across the stock would considerably reduce the amount of additional floorspace needed.

The implication of a significant reduction in the office floorspace requirements could affect the need for and/or the phasing of the development of some of the Opportunity Areas. The robustness of the current policies need to be tested.

3. Retail Developments:

The assumptions in the GLA's forecast for the need for additional comparison retail floorspace need testing, especially the baseline assumption of current sales densities being the same as the UK average, when:

- 25 London Boroughs have expenditure per head more than 10% higher than the national average and only 3 boroughs have expenditure per head lower than the national average;
- there are significant contributions from tourism and commuters; and
- the main Central London centres having Zone A rentals many times above the “average” – suggesting centre level sales densities greatly in excess of the national average.

If both the sales density average for London is higher than the national average and that for centres like the West End, Knightsbridge, King’s Road, Kensington High Street, etc are considerably higher they will “consume” more of projected expenditure and produce a lower “requirement” for additional floorspace.

4. Transport Investment

The estimated date of delivery of transport investment is critical to delivery of strategy and even more to the delivery and/or phasing of Opportunity Areas. Not all projects are of equal importance to the delivery of the strategy or supporting particular Opportunity Areas. The scenario testing should identify the critical projects, such as Crossrail, and consider the likely effects of a delay or non-delivery of particular projects.

Other possible transport policy changes, such as the introduction of a “London Lorry” - a smaller lorry that better meets the delivery loads and circumstances of London - plus distribution centres, should be tested.

5. Other Factors

Other factors which could affect delivery of the strategy include:

- the Olympic Games – these could affect the delivery of projects in other sub regions;
- Thames Gateway – likewise;
- land assembly – will land be assembled (especially for non economic development purposes) quickly enough; and
- a change in emphasis to the suburbs – putting more emphasis on developing town centres outside Zone 1.