

## London Forum comment on London Plan revision, London Plan guidance and AMRs

### Replacement for the March 2021 London Plan

There was a request by the GLA for suggestions on what should be taken into consideration in preparing the replacement for the March 2021 London Plan to which London Forum [responded](#).

Those making responses received notification from the 'Planning for London Programme' team that "An initial phase of engagement is envisaged during-March 2022, which will seek to capture a wide range of views around broad areas of discussion. Later phases starting over the summer/autumn will enable more detailed discussions on specific issues, including key long-term challenges facing London and the range of options and approaches that could help address them. We will provide further details of our plans for engagement as soon as we are able to. The Programme is intended to provide a structure to capture the views of stakeholders and, through this and the gathering of evidence, identify issues and options that a future review of the London Plan (after this Mayoral term) could consider."

That timescale is far too long. The current March 2021 London Plan version was written in 2016-2017 to be in general conformity to the 2012 NPPF and was based on data collected over five years ago. Robert Jenrick MP when Secretary of State directed the Mayor that there should be a replacement for the new London Plan as soon as possible and which would relate to the 2019 NPPF or a later one.

Engagement by the London Plan team with stakeholders about matters influencing the next plan should be comprehensive and carried out soon. It is unacceptable that the review of the current London Plan will be conducted after this Mayoral term. The next Mayor and Assembly elections are not until 2<sup>nd</sup> May 2024 so Sadiq Khan could get the current London Plan through an 'Early Alterations' process before then, as was done in 2012. The elected Mayor could produce a new plan for 2025.

The programme should not be put off until after a new Mayor is elected, as the London Plan policies will be seriously out of date on recent events and influences.

### London Plan Guidance Programme 2021

Other delays have been noticed in the introduction of London Plan Guidance (LPG) documents to help boroughs to implement some of the 2021 London Plan policies. It had been hoped that those would be adopted in 2021 but the Autumn 2021 [LPG status report](#) was disappointing.

There is a delay introduced because the [Good quality Homes For All Londoners](#) guidance is being replaced by a set of four LPGs. It was consulted on between 13 October 2020 and 15 January 2021 and was important for guiding boroughs how Policy H2 for developing small sites should be planned and applications determined. The densification of the suburbs and the use of small sites were concerns of London Forum's members and the final guidance was eagerly anticipated to help achieve sustainable development of the right design in the right places, meeting local needs.

The new LPGs for '[Small site design codes](#)', '[Optimising Site Capacity: A Design-led Approach](#)', '[Characterisation and Growth Strategy](#)' and '[Housing design standards](#)', are important for work the boroughs should have been doing in 2021 by revising their [Local Plan](#) or publishing [Supplementary Planning Documents](#) to cover those LPG subjects locally for implementing the current London Plan.

LPG Consultation was started on those four LPGs by the GLA on 11/02/2022 with a closure date of 27/03/2022 as follows.

“We are consulting on four new pieces of London Plan Guidance (LPG) relating to design and housing quality. This is the second consultation on this guidance, which builds on the Good Quality Homes for All Londoners Guidance that was consulted on between 13 October 2020 and 15 January 2021.

We are consulting again because we have made quite significant changes to the guidance including making it into four separate LPG.

### **1. Characterisation and growth strategy LPG**

This relates to the following policies in the London Plan and is used for plan-making:

- Policy D1 London’s form, character and capacity for growth
- Policy D2 Infrastructure requirements for sustainable densities
- Policy D3 Optimising site capacity through the design-led approach
- Policy D9 Tall buildings
- Policy HC1 Policy HC1 Heritage conservation and growth, and
- Policy SD9 (Part B) Town centres: Local partnerships and implementation

It sets out a three-stage process to survey and analyse the characteristics of areas and uses this to identify the character of different areas and define tall buildings. This is then used to support growth strategies that take account of areas’ capacity for change and capacity for growth, including areas where tall buildings might be appropriate and the heights in these locations.

### **2. Optimising site capacity: a design led approach LPG**

This relates to the following policies in the London Plan and is used for plan-making and directly informing planning applications:

- Policy D1 London’s form, character and capacity for growth
- Policy D3 Optimising site capacity through the design-led approach, and
- Policy D4 Delivering good design

It sets out a five-stage process for implementing the design-led approach to plan-making and the site assessments that inform specific planning applications.

### **3. Small site design codes LPG**

This relates to London Plan Policy H2 Small sites, parts B2 – 4, setting out a process to analyse the opportunities for small site development and prepare and implement design codes. It will be used for plan-making and directly informing planning applications. It covers relevant aspects of the National Model Design Code published in 2021 by national government.

### **4. Housing design standards LPG**

This relates to London Plan Policy D6 Housing quality and standards and provides a checklist of London Plan policy requirements for new build, change of use and housing conversions in one place, with appropriate cross references back to the relevant policy in the London Plan and guidance about the type of development different standards apply to.

The new guidance will be of interest to architects, designers, planners, developers, boroughs, neighbourhood planning groups, community groups and others.

The consultation closes on 27 March 2022.

### **Online Events**

We’re running the following events (all online):

Friday 4 March – 10am – 11:30am

This event is a general briefing for the general public to find out more about the new London Plan Guidance documents that relate to design and characterisation. It is open to all and is suitable for planning agents, architects and developers to ask questions and find out more about the guidance. Register on this link: <https://www.eventbrite.co.uk/e/261016205497>

Friday 11 March – 10.00am – 11.30am

This session introduces the four new London Plan Guidance documents that provide guidance on design and characterisation. It is aimed at the borough officers interested in design and characterisation. Register on this link: <https://www.eventbrite.co.uk/e/261071370497>

### Useful Links

View details on the consultation and submit your response:

<https://consult.london.gov.uk/designandcharacterisationguidance>

Sign up to attend our online events:

<http://londonplanguidance.eventbrite.com>

The London Plan 2021 can be viewed on our website:

<https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/london-plan-2021>

Any queries can be emailed to [QualityHomesLPG@london.gov.uk](mailto:QualityHomesLPG@london.gov.uk). You can post responses to: The Planning Team, Greater London Authority, City Hall, Kamal Chunchie Way, LONDON, E16 1ZE.”

London Forum would like to see the adoption of those LPGs as soon as possible.

Current [consultations](#) are on LPGs for [Fire Safety](#), [Air Quality Neutral](#), [Air Quality Positive](#) and [Large-scale Purpose-built Shared Living](#). The links give details of each of those and dates.

Each of the subject headings within the [full set of LPGs](#) can be opened to show the applicable LPGs in each. Twelve of them are in draft form at February 2022. The content of the LPGs are material considerations in local decision making, particularly where they have resulted in related policies in Local Plans. There are four ‘Practice Notes’ at the end of the list which should be taken into consideration by boroughs and community groups.

## Annual Monitoring Reports of Key Performance Indicators in the London Plan

London Forum made a [response](#) to a consultation by the GLA on what the Annual Monitoring Report (AMR) on achievement against the targets in the London Plan should be from March 2023. Concern was expressed that the Key Performance Indicators in the March 2021 plan are too few compared to double the number of targets in the 2016 London Plan.

However, recent data on achievement against targets in that previous plan is not available. The Mayor has failed to publish AMRs for 2019/2020 and 2020/2021 so we do not know what actions should have been taken on any policies in the 2016 London Plan that were not effective. That delay means that important information has been missing for three years. Also, the information on progress against the 2016 KPIs beyond 2018/2019 has not been included in the GLA KPI tables [here](#).

It is stated on that page "To minimise the impact of the delay in publication of the AMR, the data tables for each of the KPIs are presented on this page, updated with the latest available data." so it should include information up to April 2021 and later.

Peter Eversden 11 February 2022