

## **London Forum response to London Plan Implementation Plan (LPIP) 29Feb12**

Comments below are referenced to the paragraphs of the LPIP and submitted by Peter Eversden for the London Forum of Amenity and Civic Societies.

In the font used in the document, the letter 'w' appears faint.

The document is admirable in its coverage of the subjects and policies to be achieved to meet the Mayor's objectives for the capital.

- 1.1 The words "translating the trends and policies set out in the London Plan into investment decisions and plans." might be better as "translating the trends and policies set out in the London Plan 2011 into investment decisions, local plans and planning decisions."
- 1.4 The Government is calling a local authority's set of policy documents a 'Local Plan'. They seem to have dropped the term 'Local Development Framework'.
- 1.7 Problems with housing growth are
  - the risk that the Government's new 'Affordable Rent' housing, which is supposed to replace social housing, will not do so adequately in numbers for London's needs
  - boroughs may not achieve the development of sufficient new social housing using the income from the Right to Buy
  - estate renewal may result in a net loss of social housing
  - the Government's rent cap will force many families out of Central and Inner London

### **These problems need to be covered in the LPIP actions and proposals.**

- 1.11 Various community groups and amenity societies will need to understand and participate fully in the sub groups. Those will need to be on additional subjects than infrastructure on which this version of the LPIP concentrates considerably.
- 1.12 The Mayor's strategies also form part of the suite of documents for London Plan policy implementation, as mentioned in 2.3, 2.10 and Annex 1. The most important part of the 'Framework' is the boroughs' Local Plans. These have to conform in their content to what each London Plan policy states shall be in boroughs' LDFs (as in 2.11) and to the basis on which they will operate development control. London Forum considers this aspect to be important and not well done at present. The GLA Planning Decisions Unit (PDU) needs to be critical of borough plans which do not conform and to publish details. There are too many boroughs in which case officers do not quote London Plan policies in assessing applications' conformance to the development plan and, if they do, some of them are quoting from the 2008 London Plan and its emphasis on 'maximising' housing density, instead of 'optimising' it in accordance with the London Plan's sustainable residential quality density matrix and the policies in its Chapter 7 for context sensitivity and design.

There have been too many developments approved by the Mayor's PDU and implemented without being assessed further by the Mayor which do not conform to London Plan policies. This must change and only applications which conform to the development plan should be approved. Housing above appropriate density for the sites on which it is built is supposed by a KPI to be a maximum of 5% of schemes. The actual figure is over 50%, overloading social and green infrastructure and delivering homes lacking the standards, privacy and facilities that the London Plan and the Mayor's SPG state should be provided. The LPIP must address this.

- 2.5 Should Urban Design London, the PDU and the Mayoral Development organisation(s) be mentioned? In addition to London Forum, amenity societies representing tenants, ethnic groups, disadvantaged people and environmental organisations need to be engaged. These form important partners in addition to those listed in 2.6.
- 2.7 There should be reference at the end to Neighbourhood Plans, Community Right to Build and BIDs.

- 2.11 There is also Best Practice Guidance issued by the Mayor. Those publications need to be distinguished from SPGs in the wording of 2.12.
- 2.13 Add another bullet point for 'Thames Policy Area appraisals and action plans (LP Policy 7.29C)' and add to the end of the third bullet point, including estate renewal'
- 2.16 The research to be described in the published version of the LPIP will be important to cover the issues that have arisen in assumptions and changes in population, employment, housing and business development that have occurred since the draft Replacement London Plan was compiled in 2008-09.

The GLA Economics reports call for more data, e.g. WP48 on estate renewal, for the impact on the lives of the occupiers of estates. The Mayor should undertake such analysis.

- 2.17 Issues have to be recognised as for paragraph 1.7 above, plus the lack of growth of businesses.
- 3.1 This could mention the boroughs' Duty to Cooperate as covered by the Localism Act.
- 3.2 London Forum supports the need to look in more detail at Opportunity Areas. In February 2012, LB Hammersmith & Fulham approved planning applications, mostly without S.106 or CIL, for developments in Opportunity Areas before they had completed their SPDs for parts of those areas. Infrastructure contributions have been missed. That must not continue, nor be allowed to happen elsewhere. London Forum looks to the PDU and the Mayor to prevent it.
- 3.5 A shortfall in provision of homes of 2,690 annually shows the London Plan target is too low.
- 3.7 "There is a number of source documents...."

Table 1 ----- Several items in the CIL Overview shown as equating to Green Infrastructure in the LPIP are actually Social ones, e.g. Police, district heating and culture.

- 3.12 The poor state of the boroughs' infrastructure plans and CIL Schedules (only two are published) is of concern and must be improved and standardised, with a Duty to Cooperate.
- 3.26 31% to 24% looks like a decrease, not an increase in public transport mode share. A one per cent increase in walking is quite inadequate and implies that the Walk to School projects, Legible London and other wayfinding schemes and route maps in bus stops and stations will not result in any real improvement. That is unrealistic and improved targets should be set.
- 3.27 To address transport overcrowding, there should be passenger advice on alternative routes for journeys and the implementation of more bus services with limited stops.

Figure 3 ----- To reduce highway congestion, alternative routes should be marked, with "delays ahead" signs.  
Improved freight management should be achieved and deliveries in peak hours banned.

- 3.33 A key accessibility problem is the vertical gap between the platforms and the floors of carriages, which must be improved for safety, as well as for access.

**The LPIP section on transport should suggest improvements in bus services in Outer London.**

**It should seek reduction in air pollution which the Mayor's Economic Development Strategy identifies as one of the negative factors about London in the choice by businesses on where to locate. Air pollution also causes early deaths, as the Mayor has reported.**

- 3.44 The water resource deficit in East London north of the Thames could require planned delays in the

implementation of development for homes and business. This should be assessed from Opportunity Area plans and summarised.

3.46 More needs to be done to increase sustainable urban drainage. Large areas of hard surfaces should be made permeable so that there is less storm water entering the sewage system and more of it filtering through into the groundwater for extraction. More separation would alleviate the issues described in paragraph 3.53 under the Waste Water Directive.

Table 3 ----- DEFRA and Ofwat have suspended Thames Water's water main renewal project and the implications should be considered and stated. The long term figures are needed. Compulsory water metering does not appear to have commenced.

3.55 More details are required from Thames Water on what will be done to increase the treatment capacity of STWs after 2021, particularly at Mogden which the Thames Tunnel will not reach to catch overflows.

3.63 Future developments in London will be determined by, and largely located in, the areas of Opportunity and Intensification and they must be protected from flood risk. Many of them are in the area of risk along the Thames shown in Figure 7.

3.81 For energy infrastructure needs, the DRLP EiP version of the LPIP had a useful paragraph 3.21 on page 7, the content of which seems to be missing in the consultation version where there seems to be no reference to heat pumps. Such devices include ground source and air source types. The former can be considered for new developments. The advantage of the latter is that they can replace conventional gas boilers and electrical heating in homes and hence reduce the domestic energy demand. That should be promoted as part of the Mayor's and the boroughs' RENEW projects.

3.85 The remaining 40% of required gas main replacement work suggests a significant impact of road works on traffic delays and congestion. See comment above for Table 3 on water main replacement. The two major water and gas renewal projects must be coordinated and linked also with National Grid's plans covered in paragraph 3.91. The LPIP will need more detail and commitment for that than is covered in paragraph 3.102.

3.106 The GLA seems to rely too much on just BT for information on telecommunications. London Forum has pointed to the advances of the Alcatel-Lucent Group in 'lightRadio' and other developments which are not spoken about in the UK. London Forum would expect modern wi-fi and data transmission advances to lead to the replacement of the mobile 'phone masts and cabinets on the top of schools and social housing blocks where they are just above the heads of children.

3.114 London Forum looks forward to information from other telecommunications providers in the LPIP. There should be coverage of the opportunities and implications of the 4G rollout.

The loss of libraries following the financial cut-backs is of concern as they were places where those who could not afford Information Technology equipment could access information through terminals. To eliminate discrimination and lost opportunities, the Mayor should consider how to improve the availability of access to the Internet for those on low incomes.

3.125 Reuse, recycling and composting accounts for far too low a percentage of the waste and borough recycling achievements are at too great a variance and are generally inadequate. The LPIP must address this issue with some proposals for support to those local authorities and communities that are failing to recycle. The landfill fees for LACW will be a severe problem for boroughs unless there are clear actions for reduction. The priority is to manage waste materials in the optimal way, as in para. 3.134, and to use all waste related budgets in the best way for waste management facilities.

3.129 The figures in this paragraph are alarming in the extent of the waste capacity gap. There is a risk that if the funds for LWARB to allocate to more projects will not be available, the land that will be

required for various waste facilities may be used for other purposes. There may need to be safeguarding, as for industrial land and wharves.

**Waste infrastructure capacity should be funded by developers through Mayoral and borough CIL contributions.**

- 3.136 This paragraph should emphasise the need also for social care and retail facilities.
- 3.137 The focus on Higher Education ignores the fact that the standard school education is failing to equip children and young people **for** higher education. The serious problems identified of students being unable to read and write properly by the age of eleven plus the school curriculum lacking in coverage of history, languages, the arts and preparation for citizenship result in the NEET problem and the failure to equip British youngsters for further education or work. The major issue may be a long running Government education policy one under successive administrations but it used to be addressed for London by the GLC through the Inner London Education Authority. Under current arrangements, the problem is left to the boroughs to solve but the Mayor must take action to address the issues that are not being resolved, as schools cannot cope with pupils who arrive each day tired and hungry from dysfunctional homes and with special needs. The failures must be addressed and paragraph 3.142 and subsequent paragraphs indicate further research and decision making.

**This section of the LPIP should deal with the issue of student accommodation and its competition with land for housing, as covered by the London Plan Policy 3.8Bh.**

**This section of the LPIP does not cover Higher Education as one of the activities for Strategic Development Centres (LP Policy 2.16 and Table 2.1), as proposed by the Outer London Commission, which requires cross border cooperation by boroughs and concentration on associated educational facilities .**

- 3.146 London Forum notes the complex issues in the LPIP section on Health and expects the Mayor to clarify with Government what the changes in NHS funding and management will mean for the capital.
- 3.157 The LPIP section on sport does not recognise the essential contribution of informal play and recreation provided by parks and open spaces. For several of those, 'Friends' groups have secured Lottery grants and made improvement in facilities. This has been exemplified at Dukes Meadows on the River Thames in LB Hounslow. The implementation of infrastructure and facilities is in the capability of boroughs and amenity societies which can secure grants not normally available to local authorities. This is covered in part in paragraph 3.166 and it links with the content of paragraph 3.196.
- Table 10 ----- the "5 individual (policing) units required across London, centrally located (with) potential for warehouse style accommodation offering flexibility with good transport connections preferably located on accessible employment/industrial locations" and the other requirements listed in the Table 10 should be identified soon, as part of infrastructure implementation, so that land can be allocated for Police purposes.
- 3.176 The need to identify sites for fire stations applies, as for Police units.
- 3.177 It is not clear what will happen if the PFI programme does not proceed.
- 3.178 How are the progress and achievements to be reported of the "partnership working across 11 established Green Grid area groups within London and beyond via Green Arc Partnerships"? How are the area Frameworks to be consulted upon and taken into consideration in boroughs' development control?
- 3.180 The Mayor's tree planting programme is appreciated but see our comments below on paragraph 3.197.

- 3.187 Other pieces of strategic green infrastructure which should be mentioned are the Olympic Park and the improvements and green chaining in the Upper Lea Valley arising from Opportunity Area planning.
- 3.188 The Regional Park around the western edge of London will be a significant addition of space.
- 3.190 London Forum shares concern with Urban Design London, Centre for London and Friends of the Earth that the Thames Gateway Parklands initiative will not be sustained. It is vital that development in the Gateway is sustainable and delivers the linked and high quality green infrastructure and parkland that was conceived by Terry Farrell. The CIL contributions will be essential, as in LPIP paragraph 3.193.
- 3.196 London Forum supports strongly the 'Friends of...' groups, many of which are its members, as their voluntary effort in a 'Big Society' way and their ability to seek grants and Lottery awards are the best ways of supporting boroughs and other responsible organisations in management of parks, buildings and waterways. See our comment on paragraph 3.157 above.
- 3.197 There have been problems with "design, management and operational skills" in the organisations which have won contracts with boroughs to perform maintenance of parks, open spaces and street trees. That was considered by an Assembly scrutiny. Street trees form a vital part of London's green infrastructure and must be well managed.
- 4.2 London Forum **objects** to the last sentence of this paragraph. The Government has put words about 'developer viability' in the draft NPPF as something for local planning authorities to take into account and it has recently encouraged all developers to renegotiate existing S.106 agreements. Against that background, it is unacceptable that the Mayor states his reservations about developers being able to bear the costs of providing infrastructure.

It is necessary to put in place legal agreements for funding by developers of mitigation for the effects their development causes and of infrastructure needed in the locality of their schemes to cater for existing deficiencies and to cover the increased demands of the occupiers of their developments. It may be necessary in the short term to defer some of those payments or permit only partial build of approved projects but the increased land value and profit of developers must be delivered in part as contributions for improved local infrastructure. New types of agreement may have to be developed and may require developers to raise funds themselves for their contributions. The Government's future legislation on TIFs will be relevant.

If the Mayor takes the indicated 'soft' line, London will get developments lacking social and affordable housing, social infrastructure and services, open spaces and sufficient transport of the right kind. That would be contrary to many policies in the London Plan.

London Forum is concerned also how the Mayor will manage the situation if boroughs are given by Government "additional powers to offer discounts on business rates to promote economic development." Local authority funding shortfall should not have to be filled by higher Council Taxes.

- 4.3 The word "dependent" should be 'depend'. Implementation of the London Plan must require a minimum level of public spending and that should be clarified by identifying what would prevent sustainable development in particular areas.
- 5.1 London Forum disagrees with the conclusion that "Overall this Implementation Plan provides a clear overview of implementation mechanisms across all the policies of the Plan." It does not.

The LPIP has been well developed since the DRLP EiP version in its coverage of London's required infrastructure and its delivery. It will form a sound basis of analysis of achievement in those respects. However, there are statistics and analysis in the Mayor's Annual Monitoring Report indicating failure to achieve Objectives, KPIs, housing quantities, protection of open space and industrial land, life expectancy gap reduction, employment levels, development starts, childcare

places, protection of nature conservation sites and reduction in domestic energy use. Also the statistics on achievement of five or more GCSEs at grades A\*-C has variations across boroughs and in relation to regeneration wards which are not explained and need to be understood and suitable actions taken. TfL lacks the accurate and robust traffic estimates to meet a wide range of requirements for its modelling, planning, and other work.

**The LPIP must be developed to devise and publish the actions required to deal with those problems.**

There are other policies than those for infrastructure in the London Plan for which Implementation Plan content will be needed to establish the basis for achievement. Most of those are covered in the LPIP actions in ANNEX 1 but there should be LPIP main text to explain the approaches, as for infrastructure.

5.13 In line two, change "is" to 'in'.

5.14 It may be advantageous to publish the LPIP report two months after the Mayor's AMR so that it can contain actions to achieve improvements in matters that the AMR has identified as unsatisfactory. The LPIP Chapter 5 can then be up to date with steps that have to be taken and cover whatever subjects need attention.

#### ANNEX 1

The Sept10 LPIP PL.7 seems to have been omitted but there should be a partnership with Kent and Essex Councils for the Thames Gateway.

PL.14 It could be useful to add the 'Association of Town centre Managers' and the 'Purple Flag' organisation for support to the key deliverers.

PL.21 Change "drat" to 'draft'.

PL.23 Add the proposed Regional Park around West London (ALGG SPG).

PE.13 Add to deliverers boroughs and communities by use of Area Action Plans and pre-application consultancy.

PE.14 London Forum suggests 2015 is too late for the Strategic Housing Market Assessment.

PS.34 This should require development of a Thames Strategy Chelsea to Tower Bridge to fill the gap in strategy along the tidal Thames.

The "dependent on resources" comments for many actions will need explanation and proposals to address any problems.

Evidence and analysis gaps in the information for altering the London Plan and the LPIP need to be reviewed with 'Thinks Tanks' and academics, as requested by Michael Edwards in June 2009.