

## London Forum response to the London Planning Statement

London Forum is confident that the London Planning Statement is a suitable document describing the way the Mayor and the Assembly operate in plan making and decision taking. We have the following comments for improvements.

Paragraph 1.2 'ensuring that development is viable'

While the blight caused by schemes that collapse is to be avoided, the process outlined here is unclear and the methodology for arriving at an acceptable profit is obscure and surely fundamentally inequitable and undesirable however calculated. A situation in which a nationally prominent developer presses for a particular profit margin based on precedent and established margins due to scale etc while an equally capable but smaller firm keen perhaps to try new technologies or make creative use of traditional materials and construction skills thereby providing small craft based industries certainty of employment may well be able to welcome the opportunity to showcase its skills and virtually forego immediate profitability. Would it be faced with a level playing field in tendering for a contract?

The Mayor's assurance that 'he will work to make sure this is done rigorously and effectively' is too general to carry much weight.

Paragraph 1.3 seems to ask for a situation in which decisions concerning the desirability or otherwise of development could sensibly be made without full information. Cost should not be a consideration in assessing the requirement for information. The sole criterion should be the relevance of that information to the scheme and the context. The results of poor decisions made without knowledge of the full facts are far more costly.

Paragraph 2.3 for decisions to be made on all policies in the development plan is supported but something must be done to educate and encourage borough case officers to use the London Plan policies, where relevant, in their consideration of planning applications and reports to planning committees. At present, in some Councils, officers ignore points during consultation made by community representatives that are based on the policies in the London Plan and associated guidance.

The London Plan should guide borough officers and members of the Mayor's Planning Decisions Unit on the suitable density for any development. The Mayor and the Assembly must consider why that process has failed because too many approved developments are of excessive density and will overload local infrastructure, services and transport. Such schemes are not sustainable because of the adverse impacts socially, environmentally and on the lives of the occupants where private amenity and play space is inadequate.

The penultimate bullet point on page 8 is the only one starting with a capital letter.

Paragraph 3.5 onwards lacks detail on how the Mayor will deploy any S.106 funds he secures for the GLA from developments on which he makes decisions.

Paragraph 3.6 - Referable applications - The reference to protected views and safeguarded wharves should be strengthened and the Mayor's role should be seen as wholly protective without exception. The situation in both instances has been persuasively argued in relation to previous legislation and the case made on the basis of clear evidence.

The Mayor should take over applications in order to 'protect and enhance London's 'unique status and character' This is surely a point in this supplementary guidance at which the intrinsic value of London's historic built fabric and characteristically varied urban plans should be clearly stated.

In paragraph 4.2, the definition of the GLA's purposes does not include the purpose for which the Mayor may call in planning applications to 'protect and enhance London's unique status and character'. This is a purpose by virtue of it being a reason to call in applications and should be stated here.

Paragraph 4.4 lacks assurance that the Mayor will consult with local communities in the preparation of plans for sites in MDC areas and in the decision making process on developments. This needs to extend also to the LLDC dealing 'with functions like applications affecting listed buildings and conservation areas, the making of tree preservation orders and planning enforcement in its area.'

The degree of local consultation possible at this point should be clearly signaled.

Paragraph 4.4 mentions the CIL responsibilities of the LLDC. There needs to be another paragraph to explain how the LLDC will utilise CIL income. The announcement by Planning Minister Nick Boles in January 2013 stated that between 15% and 25% of CIL income should be available to the local community and should be spent in accordance with the wishes of that community. More details may be needed following paragraph 6.10.

The revision of housing targets for further alterations to the London Plan in early 2014, as on page 18, is welcomed as a shorter timescale than that suggested in the recent REMA.

The Mayor's work with boroughs (paragraph 5.3) on infrastructure is important and London Forum would expect a report to be prepared and maintained on needs and likely gaps in provision.

In paragraph 5.3 the argument moves swiftly from 'renewal' to 'development' to 'new development'. Renewal would imply care and maintenance of existing built fabric but this paragraph could be taken to imply a preference for new development as always more effective than best use of a historic building or good maintenance of the historic fabric with its embodied energy. It would of course in a sense be novel if old buildings especially some fine tenement buildings were in fact to be maintained to the same high standards as other parts of the historic fabric, as a matter of course. Maintenance with appropriate materials is frequently a major aspect of regeneration. It is also sustainable.

The section 'enabling planning permission to be given wherever possible, and to secure development that improves the economic, social.....of Greater London...' is surely the existing situation. This statement implies that local concerns are willfully obstructive.

The points made about training are important. Skilled practitioners in metal work, blacksmithing etc are needed to maintain so much of Greater London's built fabric. Joiners equipped with detailed knowledge of the craft are also in short supply. Workshop space for foundries etc should be available within London at reasonable cost. The point is not to offer short term unskilled employment but to ensure long apprenticeships are available in a wide variety of skills so that the built fabric of London including the strategic services are routinely maintained to a high standard.

Paragraph 5.5 - 'Avoiding making undue demands of developers, ensuring that the amount of detail sought from them is proportionate...' See comment above regarding the importance of full information to productive decision making.

- 'Taking proper account of development viability and local financial implications...'

There should be transparency here.

The proper resourcing of planning in London in paragraph 5.6 is supported strongly and the Mayor should review with boroughs the resources and skills they allocate to plan making and development management.

The emphasis in paragraph 6.3 on the provision of housing for the elderly is welcomed. It could free up low occupancy large houses for use by families or for conversion to multiple occupation or flats to increase housing stock.

Guidance on development viability (para. 6.7) is needed urgently for use by boroughs.

Paragraph 6.5 second bullet point refers to (planning) frameworks for both OAs and AIs but para. 6.8

refers only to those for OAs.

The web-based approach described in paragraph 6.6 is probably suitable but rewriting of legislation and regulation to suit unnamed pressures or changing expectations will necessitate ensuring that each alteration remains in conformity with all other relevant legislation and piece of guidance.

Paragraph 14 on page 32 will need rewriting.

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