

Observations from the Just Space network 29 February 2012

Overall observations

1. The Just Space network continues to support the development and annual revision of the LPIP, provided that citizens and community organisations continue to play a central role in the deliberations involved. The London Forum is mentioned as an example of a community stakeholder organisation (§2.5) which we welcome but we shall argue that representation should be wider.
 2. The DRLP 2009 was written on the assumption that what it called the "recent downturn" would be a temporary deviation from an ambitious growth path for GDP, population and jobs. We considered the Plan unfit for purpose in this respect but neither the Mayor nor the EiP Panel considered that major changes were needed in the conditions prevailing up to the end of 2010. Both however noted that early alterations would be needed if and when economic conditions were deemed to require it. We appreciate that this consultation on the LPIP is not supposed to be an opportunity to re-write the LP itself. However we are deeply concerned that it is becoming impossible for the Mayor and other agencies to implement the LP as it stands, that major revisions of implementation mechanisms and/or cutback's in the Plan's ambitions will be required. We note that the draft LPIP itself is, in effect, modifying the plan in this way - for example in changing the way S106 revenues will be apportioned: prioritising transport infrastructure and not social housing. While we strongly oppose that particular change, we support the idea that the Implementation Plan will need to adjust implementation mechanisms annually as circumstances and needs change. But logically that strengthens the need for full public/community consultation.
 3. The relationship between the LPIP and the Annual Monitoring Review (AMR) needs further thought. We have two concerns here:
 - (3.i) The findings of the Annual Monitoring Report (covering the KPIs in the Plan plus a few other matters) should be an important *input* to the annual review of implementation. For this reason it might be better for the LPIP to be revised in the months following the AMR each year, rather than published at the same time.
 - (3.ii) The AMR in its present form does not include a systematic evaluation of which implementation mechanisms are working well, and which are failing. That sort of evaluation therefore ought to constitute a key "backward-looking" section of the LPIP in its second and subsequent years. Without an appreciation of what is working well/badly, adjustments will be hard to make and hard to justify.
- Those who favour the 'plan, monitor and manage' approach to planning would surely agree with these two proposals.

4. Insofar as the LP is implemented, it is through three mechanisms, only one of which is—we think—adequately dealt with in the current LPIP draft:

(i) Investment undertaken by the GLA family of agencies, by other public bodies, by private firms and others. This crucial aspect of implementation is the main subject of the current draft LPIP.

(ii) Borough plans must, demonstrate not just 'general conformity' with the London Plan, but embody relevant subject matter and approaches as specified by the LP. The 2011 LP contains a very welcome innovation whereby most of the Policies in the Plan include a section specifying what Boroughs should do in their LDFs. An essential aspect of implementing the LP is to ensure that Borough Development Plan Documents, as they are produced and revised, do indeed embody these requirements. The need to check whether they do and publish this information appears to be a missing element in the LPIP at present.

(iii) The third implementation mechanism is via the Mayor's Planning Decisions Unit which—through informal consultations and formal Reports—advises developers, Boroughs and the Mayor on whether major schemes should be permitted in the light of London Plan Policies. Many community organisations know of cases where the Planning Decisions Unit appears to have paid precious little attention to London Plan policies and permitted schemes to proceed which fall far short of LP policies and targets. In our view this is a major weakening of the LP process which the GLA must address. It would be a good start if the consistency of Decisions with LP policies were transparently recorded as part of the LPIP cycle. Many community organisations have been especially concerned where an agreed OAPF does not exist but yet the PDU has signed off a major development project which fails to comply with crucial LP Policies.

5. On some issues member organisations in Just Space are making their own observations and these are not repeated here. In particular we are aware that Friends of the Earth are commenting. We support their views and do not repeat them here. The LFCAS is also responding and there is likely to be some overlap.

4. In the following, references (e.g. § 1,4) are made to the numbered paragraphs of the Draft LPIP or lines in the tabular Annexe (AB 7).

Process

(§1.9) We were told - and are delighted - that the Implementation Group is to be re-convened in April/May to review the comments which have been made in this consultation and the amendments proposed by City Hall. We consider that community representation on that Group should be enlarged from the present 1 to 4 (out of a total of about 20 members). A larger representation would help us better to span the range of topics (Housing etc, Environmental issues, Lifetime Neighbourhoods / local centres and Social Infrastructure) on which we have the strongest concerns. It would also make us feel less swamped by those representing business interests and the state.

Assessments and research

(§2.16, 2.17) We support the need for appropriate assessments and research work to inform implementation

It is intriguing to see that the Mayor will be making some new proposals on how needs assessments can be made 'more effective, "bottom-up", participative and consensual'. However we consider it crucial that these reforms, whatever they are, do not delay the re-assessment of London housing needs (part of the SHMA) which are becoming daily more acute and will now need to take account of the economic climate in general and of the benefit caps and cuts in particular. We have expressed this view through the working group on SHLAA but it is equally pertinent to the implementation issue. (PE6 PE14). We are very alarmed to see that the early work on this which the Mayor promised at the EiP is now not scheduled until 2015/2016.

We and many others argued strongly in the London Plan EiP that there was no evidence to demonstrate that the main benefits of 'regeneration' accrue to the deprived communities in whose name it is undertaken and the Panel (though not the Mayor) were impressed by our evidence. The GLA's own Economics unit has now published a report (WP48) which concluded

One of the criticisms of regeneration is that it often 'gentrifies' an area by displacing poor residents or by attracting a different, and often richer, population to move into an area. While this obviously happens, there is no reason to think it is necessarily a bad thing. But it will never be fully understood without longitudinal data that tracks the movement and changes to the lives of people.

and argues that...

The availability of data poses a great challenge to this, though, and without longitudinal data that records changes to the lives of individual people it may not be possible to determine conclusively whether culture-led regeneration, or indeed any regeneration, works.

Research on these lines is a very high priority and the Mayor should collaborate with the Research Councils to ensure the necessary long-term commitment and independence of the studies.

We also attach an Appendix 1 which makes some other specific research suggestions.

Infrastructure

Transport: There is a full treatment of transport infrastructure issues but we would point out three areas which we consider need strengthening:

(i) The London Plan, even in its 2011 version, remains very much focussed on the Centre's needs for infrastructure to bring workers and customers from the rest of London and beyond. The LPIP further reinforces this (controversial) focus by its

emphasis on heavy investment in major projects. Many Londoners would value more attention being paid to the implementation of less glamorous but very valuable improvements to *suburban* public transport and cycle networks.

(ii) The implementation of policies relating to bus services, cycling and better conditions for pedestrians and those with limited mobility also need more emphasis, for all parts of London.

(iii) Echoing the observations of Friends of the Earth we would stress the need for long term targets (e.g. for reduction in the need to travel, reduction in car trips, reductions in emissions) to be expressed in terms of necessary *annual* achievements against which effective implementation can be evaluated.

Telecoms: It is good to see this crucial issue receiving attention and we support the GLA's intention to strengthen this section. We have three specific comments:

(a) There are crucial equality aspects of telecoms development, with substantial exclusion experienced by low-income people and some others (including some elderly people). Tackling these exclusions in the spirit of the Mayor's commitment that all Londoners should benefit is of great importance.

(b) It is alarming to see that the GLA is heavily reliant on submissions by private providers (and only BT so far) because there is every reason to expect that their proposals would not aggregate to a strategy which is optimal for Londoners or for the economy as a whole. An independent view is needed of where an exemplary city should be headed and where the public interest lies.

(c) The implementation of cable, wireless and G4 networks need to be considered together.

Social Infrastructure: We value the attempt to take a bottom-up, as well as a top-down approach. However the present section (based on Wandsworth and other exercises) contains no timescale (§3.13 and Table 2) which weakens its usefulness.

We note the huge challenge posed by the estimates for education and health infrastructure.

(§3.26 a typo: "...increase from 31% to 24%...")

Open Space: Fig 17: We suspect this incorporates the well-known mapping error of measuring only accessibility to facilities which lie within the administrative boundary, disregarding green space beyond it. The map makes it appear that those living closest to the Green Belt are among the most deprived! We don't believe it.

Resources (ch 4)

We strongly support the moves to foster bond issue to finance infrastructure but must stress the need to structure development processes so that the growing long-term value of developments is used as a revenue stream to service and

repay the bonds, avoiding saddling future generations with debt-servicing costs as happened with PFI.

We are alarmed by the statement (§4.2) on Planning Obligations:

However, the Mayor does recognise the need for realism about the extent to which development can bear the costs of providing infrastructure, particularly in the conditions likely to exist in the early years of the Plan period.

This is alarming because we run the risk of another generation of sub-standard developments—developments without enough social rented housing, open space and other social infrastructure, transport connections and so on. The Mayor (and other authorities) should hold the line on this issue and if some development are thus unable to proceed during the crisis then we might be better off without them. In the rare cases where developments are permitted which fail to contribute their proper share of social benefits immediately, agreements and leasing structures must be organised so that the public purse is compensated as and when surpluses arise. TIF might secure this outcome but will apply, presumably, only to very large schemes. A more generic system is required for routine cases.

Incentivisation: (§4.2) We are also concerned by the suggestion that Boroughs should have greater powers to offer discounts on UBR. Such powers, which exist in many parts of the world, do tend to generate a "race to the bottom" in service provision and often lead to the aggravation of spatial disparities.

Comments on Annex 1 (where not already implied by comments above)

Final column (Certainty...) The phrase 'Dependent on local commitment' is used in many cases where strong strategic involvement and commitment by the Mayor is crucial and we believe that should be made clear. For example this applies to:

PL 11 (OAPF)

PE 9 (Density Matrix) where Boroughs, left to themselves, have been exceeding the permitted maxima in a majority of consents and there simply has to be better policing

Column on Key Deliverers There are not nearly enough cases where community / NGO / voluntary sector bodies are referred to here. In particular:

PL6 and 7: Olympics and legacy

PL12 Regeneration - cf LP Policy 2.14

PL 14 and 15: town centres

PL 20 and 21 Parks

PE 3 4 5 Equalities (LVSC and other groups)

PE6 SHLAA (communities are represented but the table should say so)

PE 12 Play (London Play, especially)

PE 15 SHMA

PE16 Disabilities

PE18 Housing Improvement

PE20 Guidance on affordable housing
EC 12 (and others?) retailing, especially markets, local shopping
CC1 Climate change
PS 1, 2, 3 Neighbourhoods (we are represented but the table should say so)
Transport: communities / users seem not to be involved in an of the transport tasks and this needs further thought
PS 12 Air Quality etc
PS 27 Blue Ribbon network
MR 1 Monitoring
MR3 CIL (especially on the Community Slice and social infrastructure)

Affordable housing: PE 19-24. It is important that consideration of affordable housing stocks (and within that of social rented housing stocks) pay better attention to losses of units from the stock as part of the implementation of the Mayor's policies. Our understanding is that, especially in estate renewal schemes, units lost or vacated do not enter the statistics until we see the completion of the replacement housing: the losses are then taken account of in the 'net additions' variable. This has long been a problem but is now likely to become more and more serious as renewal schemes slow down or stall completely.

Economy: EC 1-13 We have always argued that the GLA (and in its day the LDA) should pay more attention in research and policy-making to the specific study of sectors of the economy as well as land-use categories (offices, shops). Some recent GLA Economics work seems to be heading in that direction, which we welcome and we hope that the new relationship between the 'economic' parts of the Mayor's family strengthen this tendency. In particular we hope to see studies of low-pay sectors and of ways in which rising pay and rising productivity might be fostered through policy. One million pounds of increased output from low-pay sectors contributes to measured economic growth just as much as another million from banking and business services.

Appendix: JSN document on research needed, June 2009. This set of proposals remains largely valid.

THE NEW LONDON PLAN – EVIDENCE AND ANALYSIS GAPS

Submitted to the Mayor in response to consultation on the first stages of the London Plan Review by Michael Edwards (KXRLG and at UCL) Richard Lee (Just Space, where a draft was discussed) David Fell (Brook Lyndhurst) and with wide support from many individual and group stakeholders. 30 June 2009

Priorities: are the paras in bold here.

Process: Many stakeholders have taken part in discussions on this list and it is being submitted now along with proposals that (i) we greatly value openness about what research is being done, or commissioned, by the LP team and cognate bodies; (ii) we also greatly value seminars and other opportunities to discuss research while it is at formative stages, and midstream and when it reports and we hope that the Team will multiply such opportunities. We could elaborate on this list upon request.

Methodology 1. Alternative scenarios, a most welcome innovation foreseen in the pre-plan document, should include, as possible contexts, • a very long and serious recession as one scenario, and • accelerating urgency of global warming as another scenario.

2. There should be linked forecasts in place of (or alongside) stand-alone projections, for example to explore how economic growth affects population growth and travel, how infrastructure capacity can constrain job growth and so on. Some of the discussions in earlier EIPs were hamstrung by the absence of any preparation on these links.

3. There should be a strengthening of cross-border analysis, at the edge of Greater London, perhaps on a sub-region corridor basis, with an emphasis on commuting, housing, shopping, food production, resources and waste disposal.

4. To recognise the value of local evidence on the ground and to invite evidence from the voluntary and community sector as well as the public and private sectors.

5. A collaborative approach to the analysis of the data, and a sharing of consultants' drafts and reports with key stakeholders, through documents and seminars.

Substantive issues Climate Change, economic recovery, poverty-reduction

6. What options are available to achieve the imperative of integrating Climate Change into each chapter of the London Plan?

in more detail:

7. Starting from the fixed target of a 60% reduction in CO₂, to research what part the London Plan can play in creating a low carbon London economy. This would partly be a matter of linking (and avoiding duplication among) studies in the Plan Team, the Assembly and other members of the GLA family of bodies.

8. Focused research on everything that contributes to reducing the need to travel,

- especially meeting more needs closer to home,
- focusing attention on the bottom of the town centres hierarchy (including corner shops, post offices, surgeries etc) rather than the top,
- including self-employment and working from home,

- facilitating productivity growth and greening in these activities and
- facilitating shortening of car trips and switching to walking and cycling.

9. To assess the ability of the component parts of the economy (quite finely divided) to contribute to a green London economy, to economic recovery and to the reduction of poverty, including

- local sourcing of food
- contribution to CO2 reduction and air quality improvement
- academic institutions and a green knowledge economy
- the number of new green collar jobs in utilities
- low carbon retailing
- business services geared towards a green economy linked with...

10. London Plans to date have defined economic development narrowly and more weight needs to be given, through the evidence base and policies, to a diverse economy, analysed in much finer sectoral divisions than hitherto. The team is urged (with the economic agencies), to analyse what role the London Plan can play in bridging the poverty gap by improving the viability, skills, productivity and pay in the low wage sectors (retail, catering, cleaning, personal care, repair and maintenance) which are at least half of the jobs in London.

– To research what a Spatial Development Strategy can do to meet the needs of SME's, social enterprises and home workers

11. Lifetime neighbourhoods *[On this issue progress and consultation is good – note added Feb 2012.]*

- To analyse the impact of current London Plan policies on social infrastructure and amenities of all kinds (eg green space, play areas, community meeting places, local shops) and to identify planning policies which will be effective in protecting and enhancing these essential components of sustainable communities.
- To develop a local needs index of the shops, social and community facilities and open spaces which need to be accessible to everyone within easy walking distance.
- Develop a matrix for lifetime neighbourhoods which local stakeholders can use to assess how well a neighbourhood scores for services being available nearby and within walking distance. As well as being a suitable tool for assessing district centres, the matrix must also assess local centres and non-centre services both of which tend to be discriminated against under current policies.

A concern with this micro-availability of services is of strategic importance because of the cumulative effects on energy use and fairness. It is for the boroughs to decide how to plan but strategic policy should guide them.

12. Housing a) To research what has been the impact of the current housing model/ current housing policies in the London Plan on the quality of life of the existing residential communities in and near the Opportunity Areas, identifying the types of agencies / firms which have been most and least effective in meeting plan objectives.

b) To assess the ability of different house building models to deliver the amount of affordable housing required to meet future need and the backlog of need, and the ability of the model to prevent the displacement and dispersal of existing communities.

13. Value added, values and well-being: to explore the potentialities of the recent research on the measurement of 'well-being' as an alternative or complement to the conventional plan objective of maximising conventional 'value added'.