

Keeping up – revising London's plan

The London Plan is vital to ensuring that growth works for everyone who lives, works or visits London and as our dynamic city changes over time it is important that it keeps pace. Jen Peters outlines lessons from the approach adopted by the emerging new London Plan



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The London Plan is not 100 per cent everyone's type on paper, but it has a unique and successful role in London's planning landscape. London has a fairly embedded approach to spatial planning, being required by the Greater London Authority Act since 1999 to publish a Spatial Development Strategy (SDS) and having had a London Plan (the adopted name for the SDS in London) in place since 2004. The Plan preceded, and has now outlived, the Regional Spatial Strategies, which were to perform a similar function in the rest of England.

The London Plan sets out an integrated economic, environmental, transport and social framework for the development of London over 20-25 years. Borough Local Plans must be in general conformity with the London Plan, and, as it forms part of the development plan, it is also directly relevant to development decisions. This is important, as it means the Plan can have a direct and timely impact.

The legislation sets out that the Plan must only cover matters that are of strategic importance to London, taking account of the principal purposes of the Greater London Authority (GLA) (as set out in Section 334 of the Greater London Authority Act 1999), which are:

- promoting economic development and wealth creation in Greater London;
- promoting social development in Greater London; and
- promoting the improvement of the environment in Greater London.

In developing the strategy, the London Mayor must have regard to:

- the principle that there should be equality of opportunity for all people;
- reducing health inequality and promoting Londoners' health;
- achieving sustainable development in the United Kingdom;
- climate change and the consequences of climate change;
- promoting the use of the Thames, particularly for passenger and freight transportation;
- the resources available to implement the Mayor's strategies;
- the need to ensure the strategy is consistent with national policies; and
- the need to ensure the strategy is consistent with the Mayor's other statutory strategies.

This provides a degree of flexibility over the content of the Plan; what is considered to be of strategic importance is largely a matter of judgement, informed by the nature of the challenges and opportunities facing London.¹ There has therefore been significant scope for the approach and content of the Plan to change, and it has evolved over its iterations, responding to the experience of implementing earlier versions and to the challenges that London faces.

Why we need spatial planning



London is a complex area to plan for, and the scale of the challenge that the capital now faces is enormous: by 2041, London's population is set to reach 10.8 million, and the number of jobs in the capital is expected to rise to 6.9 million. With this level of growth on the horizon, we face some difficult decisions. Having a spatial development strategy allows London to focus development in the most sustainable locations, ensuring that its land use needs are planned for with an understanding of how London can function effectively as a whole. Moreover, it provides the opportunity not only to ensure that growth is accommodated, but to use the opportunities it provides to improve the city. The Plan² champions 'good growth' – growth that is socially and economically inclusive and environmentally sustainable – and moves away from approaches that promoted growth at any cost.

The Plan also provides an opportunity to understand and respond to the interconnectedness of London and the Wider South East, but the lack of formalised regional governance arrangements outside London makes it difficult to consider broader strategic growth requirements, beyond the willing-partners approach that is currently being pursued, and that is set out in the draft Plan.

Considering London as a whole can mean that the Plan adopts approaches that may be different from those that a local community, a borough or a developer might take, looking at the issues from their particular perspective. The Plan provides an opportunity to direct the different types of growth and development in the most sustainable places for that land use. Housing targets, for example, are based on capacity for housing growth in each borough, focusing growth in the most sustainable locations and taking account of other land use requirements, while ensuring that need is addressed at the London-wide level.

In developing the Plan, the GLA works very closely with bor-

oughs – after all, they are key to its delivery – but there is no requirement for all boroughs to support the Plan for it to be published. This is different from the new Combined Authority spatial development strategies, where the Mayor can only publish a strategy if there is unanimous support from the constituent council members of the combined authority. This allows the London Mayor to address key challenges and plan sustainably for London as a whole. Sometimes this causes tensions with the boroughs, who will, understandably, consider issues from a local perspective, rather than from the strategic, London-wide, point of view; but it also allows difficult decisions to be made that may never be resolvable at the local level.

The evolution of the Plan

There have been three 'new' London Plans – the first, Ken Livingstone's Plan published in 2004; the second, Boris Johnson's Plan published in 2011; and the third, Sadiq Khan's Plan published in draft in 2017, which has been through the examination process³, and the 'intend to publish' version being sent to the Secretary of State in December. The content and tone of the Plan has evolved over these iterations. This reflects changes in administration, changes in national policy, the embedding of the regional tier of planning and the maturing of the GLA more generally; but it also reflects changes in the challenges that London has faced in this time.

The interpretation of the regulations for the first Plan in many respects set the framework for future London Plans. It contained 184 policies, and the topic areas have remained broadly the same in subsequent Plans. The second Plan could be described as a detailed update of the first, taking account of the change in national guidance (with the implementation of the 2004 Planning and Compulsory Purchase Act and associated policy and guidance). Despite the change in administration, from a Labour to a Conservative Mayor, many of the policies and approaches remained broadly intact. However, there was a different emphasis and priority given to certain issues.

Although only an alteration, the Revised Early Minor



Alterations to the London Plan (2013), which focused on the introduction of the government's affordable rent product, were important as they were the first alterations following the abolition of all other regional strategies and associated guidance and the publication of the National Planning Policy Framework (NPPF).

The 2012 NPPF was not written with the regional tier of planning in mind (after all, regional planning remained only in London), thus the question of how the Plan should respond to national policy was left open to interpretation, including whether or not the NPPF tests of soundness even applied to the Plan.

The Further Alterations to the Plan followed in 2015, driven partly by the realisation that the population of London had grown much faster than was anticipated in the 2011 London Plan. Meeting London's housing and economic needs in the context of this increased level of population growth heightened the challenges London faced, which would be further explored in the full review.

The emerging London Plan

Sadiq Khan's 'new' London Plan is nearing the end of a lengthy process of development, consultation and examination. Work on the evidence base for the Plan actually started in 2015, with the draft Plan being published for consultation in December 2017 and Minor Suggested Changes that responded to the issues raised in the consultation published in August 2018.

The Examination in Public (EiP) process began in Autumn 2018, with the Panel of Inspectors setting out 94 matters to consider.⁴ Hearing sessions were held between January and May 2019, allowing the Panel to fully examine the policies in the draft Plan and the evidence base that underpins them, with participants invited to discuss key issues in more detail. Representatives of a range of organisations attended, from boroughs, developers and landowners to community and campaign groups. The Panel did not generally invite supporters to the sessions, expecting the Mayor's team to justify the approaches taken in the Plan, calling on other experts where necessary.

A range of views were expressed on almost all matters, with people and organisations with different objectives arguing for policy approaches that would suit those objectives. Many of these >>>

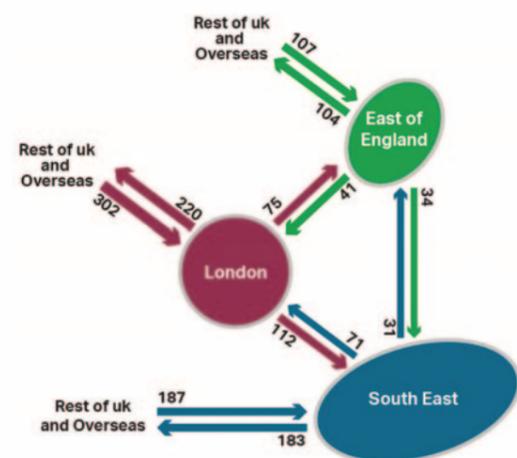
>>> arguments were persuasive on their own terms, but did not necessarily consider the London-wide context and the opportunities and challenges that London faces as a whole. This is a key part of the Mayor's role in spatial planning: developing a Plan that can deliver sustainable development that works for everyone across London, and justifying specific policies through reference to this wider approach.

Sadiq Khan's draft Plan had the benefit of being informed by the development, implementation and evolution of the earlier Plans and alterations, and previous interpretations of how the NPPF and the Plan interact, but it also reflects the more acute challenges London now faces. The draft Plan seeks to build on the successes and lessons of earlier Plans to provide the strategic framework required to respond to current growth pressures. Experience of implementing a range of policies and approaches has demonstrated the importance and effectiveness of consistent London-wide planning policy that can be directly applied in development decisions. Among others, the implementation of policies on carbon dioxide emissions, housing and accessibility standards and, more recently, affordable housing through the threshold approach to viability⁵ have provided clarity and certainty and have helped to speed up decision-making.

It has also become clear that many strategic issues, such as modal shift or ensuring enough homes of the right tenure are delivered, can only be adequately addressed through a consistent and concerted effort across the capital, with detailed requirements set at the strategic level to ensure that development in all parts of London contributes to the strategic aims of the London Plan. To achieve this, the Plan must provide clear and consistent policies.

Experience of policies that have not had the desired impact in

Figure 2.14 - Average annual gross migration flows 2016 – 2041



Source: GLA, 2016-based central projections - population in thousand

The views expressed are personal. This article was first published in *Town and Country Planning*; by kind consent of the TCPA

implementation has also shaped the drafting of the new Plan – for example, the importance of retaining sufficient industrial land has been covered by policies in previous plans, but still London has been losing far more industrial land than evidence suggests it should. Learning from this experience, the new Plan provides a stronger policy approach, which can be directly applied to decisions where necessary, ensuring that London has the industrial floorspace capacity it needs, while also making the most efficient use of land.

As the challenges that London faces mount up, the options for resolving them become depleted and the potential solutions more complex, the spatial development strategy becomes more important. It has to comprehensively deal with competing priorities, which means providing clear policies that can be implemented quickly and consistently. The level of growth that London needs to accommodate could not be supported without policies that ensure that:

- development is of high quality and is suitably located;
- development potential is optimised;
- a range of needs are met;
- homes meet minimum standards;
- sufficient industrial capacity is retained;
- employment opportunities are promoted across London; and
- new development is safe, contributes to the reduction of carbon dioxide emissions, protects and enhances London's open spaces, and takes account of London's distinctive heritage and character.

Perhaps most importantly, a robust approach to affordable housing is vital, given London's high levels of need and the failure of past Plans to meet it.

The draft Plan seeks to exert effective and timely influence in matters of great importance to London, including in development decisions – which is crucial, given the challenges that London now faces and the importance of delivering 'good growth'.

Consultation and engagement

Understanding the nature of those challenges requires not only a detailed quantitative evidence base, but an understanding of the views of Londoners. The importance of bringing stakeholders into the process early is a lesson that has been learnt over the years, and the development of this draft Plan has been informed by greater consultation than previous iterations.

In October 2016 the Mayor published *A City for All Londoners*,⁶ which set out his vision for London. It outlined the key challenges and opportunities for London, and it was here that the concept of 'good growth' was first introduced. The aim of the document was to initiate public discussion of important

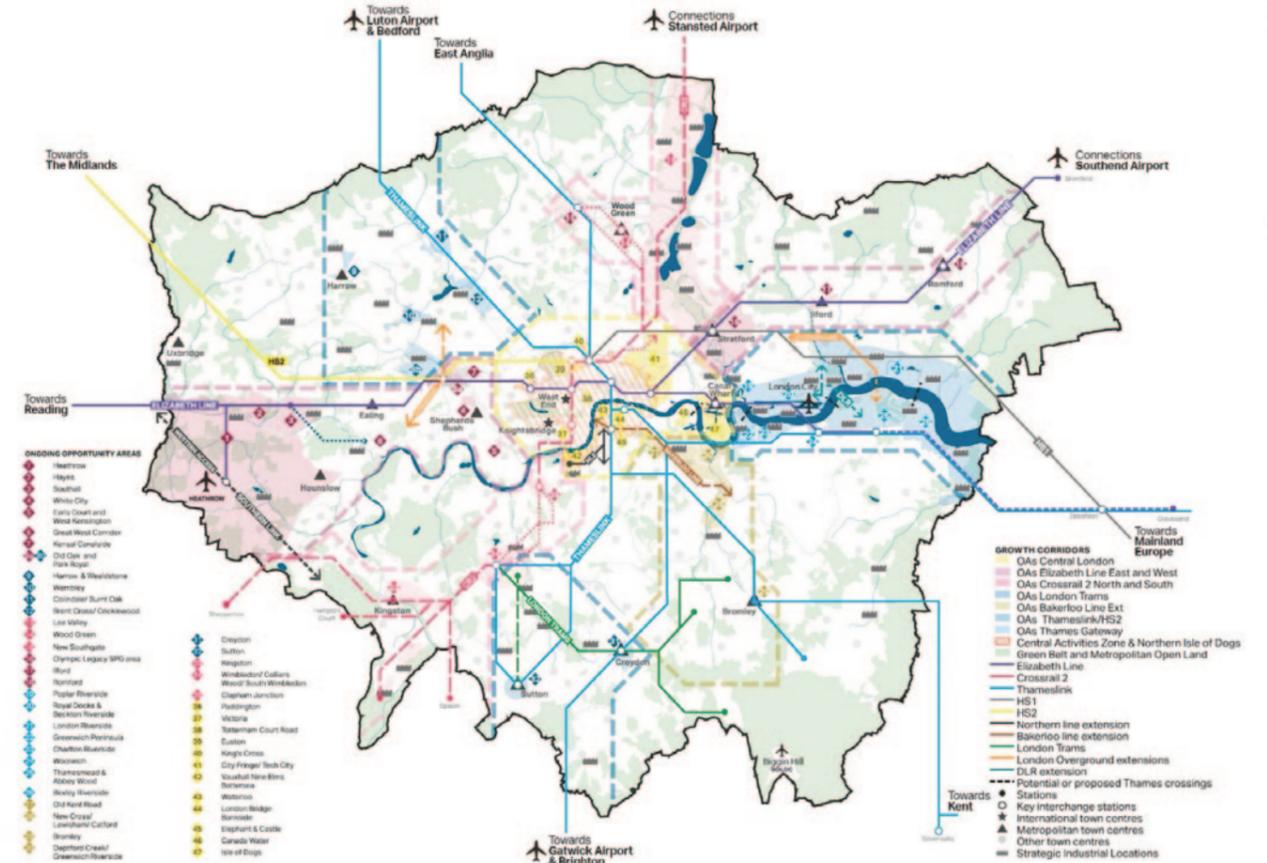


Figure 2.1 - The Key Diagram

issues to inform the preparation of the Mayor's strategies. A large-scale and in-depth public consultation was undertaken, and the findings and feedback informed the development of the London Plan and associated evidence base.

Alongside discussions on Talk London – City Hall's 40,000-strong online community of Londoners – this consultation included a series of workshops exploring the themes of accommodating growth, transport, an inclusive city, environment, housing, and economy. To gain a better understanding of members of specific communities' experience and views of different issues, the GLA also held a series of focus groups, ensuring that this included groups that are sometimes under-represented in public consultations – including women, LGBTQ+ Londoners, deaf and disabled Londoners, refugees and migrants, BAME Londoners, younger Londoners (17-25), and older Londoners (70+).

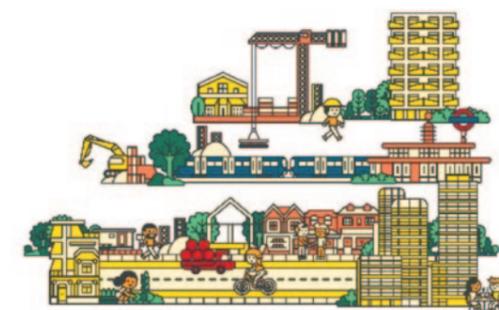
The consultation process for the draft Plan itself was also more extensive than it had been before. In response to feedback that the Plan is hard for non-planners to engage with, and to open up the range of people taking an interest in the spatial development strategy, the 'Good growth' chapter of the Plan was written in a more engaging and accessible format than the detailed spatial and thematic chapters. The launch of the draft Plan was also accompanied by a leaflet with a tailored version of the 'Good growth' chapter, to facilitate broader engagement with the process.

Around 4,000 responses were received on the 2017 draft Plan, compared with 400 for the previous full review. Our concerted effort to improve engagement had clearly been successful, but there is still more to do to ensure that consultation is a

wide as possible. Key to this is ensuring that people can really engage in the issues and understand the difficult decisions and competing priorities that London faces.

There are many lessons to be learnt from the London experience that can be applied across the whole country. One point that has become abundantly clear is that spatial planning at a city-wide level is absolutely fundamental to the delivery of good growth. Without the London-wide view that the London Plan provides, it would be impossible for London to grow sustainably.

It is also apparent that the content and nature of a spatial plan need to evolve to respond to lessons learnt from previous iterations and address current and future issues, challenges and priorities as effectively as possible. Revising a spatial development plan such as the London Plan involves a mammoth amount of work, and at times it has felt like a feat of endurance. But the Plan is vital to ensuring that growth works for everyone who lives, works or visits London; and as our dynamic city changes over time, it is important that it keeps pace. ■



Notes
 1 What the scope and content of the London Plan should be discussed extensively at the recent Examination in Public. See the Mayor's Written Statement on Matter 7, 'Format, Scope and Content of the Plan', for a more detailed explanation, at <https://tinyurl.com/wnpcln6>
 2 At the time of writing, the EIP Report had recently been published and the 'intend to publish' version of the Plan was expected to be released shortly. This has now been published: <https://tinyurl.com/t4mpel>
 3 Report of the Examination in Public of the London Plan 2019. Report to the Mayor of London. PINS/SDS0026. Planning Inspectorate, Oct. 2019: <https://tinyurl.com/r93ux9x>
 4 The London Plan Examination in Public webpages, at www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/examination-public-draft-new-london-plan, provide access to all the EIP written documentation
 5 Homes for London, Affordable Housing and Viability Supplementary Planning Guidance issued in August 2017 and available at <https://tinyurl.com/uxp3pah>, introduced the 'threshold approach' – key elements of this approach were included in the draft London Plan
 6 A City for All Londoners. Mayor of London. Greater London Authority, Oct. 2016. <https://tinyurl.com/wsvu7c2>