

The new London Plan

Londonforum
Working to protect and improve the quality of life in London

We give a brief outline of the structure and contents of the Plan; how the Examination in Public is being conducted and some of the London Forum has put forward. Peter Eversden reports.



Following the Forum's detailed written response in January 2010 to the Mayor's draft replacement London Plan (DRLP), the Forum was invited by the Panel of Government

Inspectors to participate in most sessions of the Examination-in-Public of the DRLP. Michael Bach, Roger Chapman and Peter Eversden are involved in that from March to the end of October.

The Plan, a vision from now to 2031, is divided into eight chapters setting out various policy groups:

- new homes, including affordable housing, housing design and quality, inequalities, poverty, disadvantage, social infrastructure and quality of life issues
- economic development and employment; policies for outer London, inner and central London; developing town centres; improving job opportunities, and arts and culture

- tackling environment and climate change; reducing CO2 emissions and heat loss from new developments; increasing renewable energy; managing flood risk; improving recycling performance and waste management

- safe and convenient transport for everyone; encouragement of cycling walking and low pollution vehicles, managing congestion and reducing the need to travel.

- architecture; historic environment; buildings neighbourhoods, development context sensitivity; views management; air and noise pollution; open space protection, and London's waterways.

The Examination in Public has taken the form of a set of Inspectors' questions about each DRLP policy for which London Forum has submitted fifty-one statements of up to 2,000 words each. We produced additional papers confirming our arguments made during debates for changes to policy wording

The DRLP differs from versions published by Ken Livingstone when he was Mayor in that the new policies have more than just strategic statements

and aims, they include guidance on planning decisions and on the relevant content of borough Local Development Frameworks (LDFs) for each subject.

Details of the Mayor's Vision for London, the Objectives he has set for the replacement London Plan and policies that the draft plan contains will be put on to the London Forum web site.

Greater devolution

In the course of the Examination the effect of the devolution and localism policies of the Coalition Government have been significant. The Mayor has published suggested changes to his DRLP and issued statements on the progress towards the Big Society in which he gives more power to London boroughs. There will be freedom in future for boroughs to define their own policies for several topics that the Mayor had controlled in the past. They are likely to have management of their own housing funding. The Mayor is seeking to take over the Royal Parks, the Port of London Authority, several rail franchises and to have more control over housing skills, policing and health.

Many areas for improvement

Although London Forum did not have any fundamental disagreement with the thrust of the new plan, it saw many areas for improvement and changes were sought. London Forum's key points on the DRLP were as follows.

In the Context and Strategy part of the DRLP, (Chapter 1) the objectives do not include reducing the need to travel which is mentioned in the chapter on transport but is something London Forum believes should be taken into account throughout the Plan and be set as an extra strategic objective. We sought a stronger emphasis on sustainability and measurement of targets.

We criticised the Mayor's failure to manage traffic congestion and air pollution and expressed concern at his implied relaxation of limits on car parking in new developments.

Inner London

The policies for Inner London (Chapter 2 London's places) were not thought to be good

enough and the Forum argued for more strategic attention to its complex mix of large concentrations of deprivation workless residents, poor housing, vacant or underused commercial property and town centres that need regeneration. It needs to be supported in accommodating growth in ways that enhance the environment and strengthen its neighbourhoods. The management of its night time economy will be important. Comprehensive changes to Inner London policies were submitted and London Forum will check closely what it has achieved when the Inspectors report next March.

The Central Activities Zone

We have sought to protect residential quarters in the Central Activities Zone (CAZ) from the main DRLP policies for the area, explicitly resisting large-scale office development and specifically resisting tall buildings that would change their character. Definition was sought of preferred office locations and of locations where extra tourist accommodation would be appropriate. Of concern is the implied reluctance to provide additional affordable housing within the CAZ. Objection was raised to the proposed extension of the CAZ to include the Battersea Opportunity Area.

Areas of opportunity and intensification

In the examination of policies for London's 43 areas of opportunity and intensification, London Forum pointed out that many lack a level of transport that would allow their full potential for extra jobs and new homes to be met. The phasing of public transport improvements for such areas should be indicated in the Plan and used as a basis for

development decisions. Potential phasing of the delivery of homes and jobs should be given also and subject to annual monitoring That requires more urgency to complete the planning frameworks for the areas.

Many participants, including London Forum, sought improvements to policies for regeneration and estate renewal and a session has been set to review those towards the end of September.

Town Centres

On policies for Town Centres, London Forum

urged caution in boroughs raising the classification of their District Centres because of the development pressures that could bring and because the whole network has to be coordinated across London. The DRLP town centre policy does not provide a clear strategy for the development of that network and the regeneration needed. The DRLP classification of Brent Cross as a town centre was opposed. It is still a regional shopping centre as in the current Plan. The draft policies fail to recognise the potential contribution and potential role of district and local centres but the Forum supported the policies for a successful and diverse retail sector for those locations. However, we asked for more ambition and focus in policy for small shops.

Arguments were put to the Examination for the application of the sequential test for new supermarkets and for their location to be in town centre or edge of centre locations, with avoidance of large floorplate versions.

The Forum has suggested that emphasis should be much more on improving access to town centres as the foci for employment, shopping, leisure and services, with social infrastructure developed to meet local needs and its facilities to be within walking distances.

Protecting open spaces

Support was given to the DRLP policies for protecting and developing open spaces and London's Green infrastructure. Attention was drawn to the fact that London's waterways comprise its largest area of open space and should be protected and enhanced for their biodiversity, leisure and transport functions. A lot of it is classed as Metropolitan Open Land. It is thought that the policy proposals for LDF content and the map of open spaces need to be improved and that deficiencies in open space and opportunities for green chaining must be addressed.

London's economy

London Forum gave evidence that the policy for developing London's economy (Chapter 4) did not deal well enough with the issues and opportunities identified in the Mayor's Economic Development Strategy, nor sufficiently deal with the needs of small and medium enterprises and social and community ones. We questioned the assumptions in the DRLP for office space and retail floor space and urged that boroughs must develop preferred location policies for offices, light industry and other economic development uses. The Forum emphasised that policies must specify how affordable workspace will be retained and provided to support new and emerging economic sectors. LDF preparation and planning decision guidance is lacking in that section of the DRLP.

Better links in the chapter on economy were

sought by London Forum to giving children a good start in life, identifying space for schools, planning estate renewal and regeneration and providing skill development to improve people's life chances. Social Impact Assessments for Opportunity Area plans were proposed to the Panel so that benefit to local communities is considered.

Draft policy for London's visitor infrastructure is thought to concentrate too much on hotels with a lack of emphasis on information, help, street signage, ease of use of transport, safety, toilets, coach parking, food, etc.

On arts and culture, London Forum criticised the draft Plan for failing to convey the strength and quality of London's heritage as a world-class visitor attraction. The two associated policies do not recognise London's assets, including theatres, stadia and cinemas, whether as infrastructure and part of the economy, let alone as heritage assets.

Climate Change

The Panel conducted a very searching examination of the DRLP policies for climate change mitigation, CO2 emissions, sustainable design and construction and retrofitting of existing buildings. (Chapter 5) Six selected participants failed to attend but the debate was useful. The Mayor withdrew a table of targets for installed energy capacity generated from renewables and will replace it by guidance, in accordance with devolution. Several developers criticised the need, value, viability and cost to users of combined heat and power systems and the investment required in advance of achieving zero carbon homes which will then not need the heating. The boroughs were more supportive of the draft policies and the GLA promoted the benefits of wider district level schemes. The 60% target for CO2 reductions was queried by many present and interim targets were requested.

The climate change chapter also contains policies on overheating and cooling, encouraging urban greening, the use of green roofs, the management of flood risk, sustainable drainage, water efficiency and the management of water quality. It aims to improve London's recycling performance with a goal of sending zero waste to landfill by 2031.

London Forum expressed concern over what it sees as deficiencies in Flood risk management. Nor is any specific mention made of the risk to the Tube system if flooding occurs. Even a small amount of flooding would cause enormous damage to the business activity of London. The Forum called for a better balance of speed and intrusion in the construction procedure proposed for the Thames Tideway Sewer Tunnel, the construction of which could need considerable land. The Forum suggested that existing canals could augment water supply to treatment plant by

transferring water from areas with surplus.

The examination continues in September and will cover housing, transport, waterways and place making, including policies for building design and location. London Forum will participate in the next weeks of the DRLP examination and seek more policy changes for improvements within the following topics.

Public transport

London Forum commented in detail on the Mayor's Transport Strategy (MTS) and on transport policies in the DRLP, (Chapter 6) being particularly concerned that there should be a proper allocation of resources and funding, sustainable integration of development and transport capacity, reduction in the need to travel, congestion management and pollution reduction. London Forum has objected to the Mayor's proposal to remove the western extension of the Congestion Charge Zone and his delay in implementing low emission zones.

Several conflicts between the DRLP and the MTS have been identified and reported.

Step-free access is an MTS aim but not a DRLP policy. Queries have been raised on further transport overcrowding before Crossrail is operating

Proposals have been made for changes to policies for transport capacity and connectivity, freight management and parking.

London's people and homes

Chapter 7 contains policies to secure equal life chances for all in London with a new and integrated approach to housing and social infrastructure. More emphasis on quality and space – optimising rather than maximising housing density, and with new internal space standards. The London Forum supports the objectives to deliver more high quality homes; reduce health inequalities and support sustainable neighbourhoods. It particularly welcomes the policy to protect and enhance social infrastructure. London Forum will be seeking more affordable housing, homes for families and high standards for estate renewal. The DRLP in this section aims to enhance the environmental quality of London's streets, places and neighbourhoods and improve the places that people live in, work in and visit with better urban design and green spaces. New development must make a positive contribution to existing character, particularly in areas of historic significance, and preserves and improves heritage features.

Protecting views

The Forum campaigned for a strengthening of views policies with a Views Management Framework that would properly protect the important views of London from being blocked by developments. We

think that the list of designated views is too small, focusing predominantly on the centre. There are many views in Outer London of great importance not only to their communities, but to those in more central areas. The Forum firmly has opposed the suggestion "that it is not necessary to preserve every aspect of a designated view".

Tall and large buildings

The Forum is totally opposed to the policy for location and design of tall and large buildings, which is worded to promote them as a means of "changing or developing an area." We reject also its very low level strategic aim that tall and large buildings should do no better than "not have an unacceptably harmful impact on their surroundings", which is a pathetically low ambition and is in direct conflict with other strategic policies. London Forum will be seeking a positive contribution from large scale developments, with enhancement of the amenity and vitality of the surrounding streets. Mindful of the way some communities were harmed by the design, architecture and layout of social housing regeneration projects of the 1960s, the policy should propose full community consultation by boroughs on new developments in an area.

Restoration of the Blue Ribbon Network

The waterways policies in the current London Plan have been weakened in the DRLP version but there are new policies for Blue Ribbon Network restoration, supporting infrastructure and recreational use. London Forum will be working with waterways groups and Environmental Law Foundation's lawyers to seek improvements to this part of the London Plan.

Implementation, Monitoring and Review

The last DRLP chapter deals with the nuts and bolts of delivery and explains how progress will be measured. The Mayor wants to have a yearly monitoring process which is easy to carry out and understand. He will produce an Implementation Plan to describe the key actions that the Mayor and other partners need to do to ensure that the London Plan makes an impact.

London Forum is critical that the key performance indicators (KPIs) and targets proposed are inadequate. Each KPI should be directly linked to the key policy/policies whose performance will be monitored. Some KPIs seem to be either "freestanding", "contextual" or not directly monitoring the impact of spatial planning policies. Policies on the location of development need to be more ambitious. Proposals for more specific indicators will be proposed.

This summary represents only a small proportion of London Forum's response to the consultation. Full responses on any draft policy or topic can be emailed to members on request. ■

Trouble on the Tube

With government budget cuts, work needed to the tube is unlikely to be ready in time for the 2012 Olympics says *NewsForum* Editor Helen Marcus.

In a controversial move in May, scarcely noticed due to the election, London Mayor, Boris Johnson, ended the £30 billion London Underground Public Private Partnership by buying out Tube Lines' shareholders, Amey, a unit of Spain's Ferrovial, and U.S.-based Bechtel, for £310 million. The deal was completed in June after mounting problems put the financing of the PPP's next seven years in doubt (see *newsforum* no. 56) and effectively brings the London Underground back under state control.

It will be financed from TfL's existing annual budget: with its secure debt rating, no middle man and no punishing management fees, it should mean lower debt repayments over the long term. A spokesman for TfL said that the deal would involve no extra financial call on the Government, farepayers or taxpayers in relation to the upgrade of the Tube.

Transport for London will now directly control the day-to-day maintenance and improvement programme for the Jubilee, Northern and Piccadilly lines. Mayor Johnson said: "This deal is excellent news for London. Freed from the perverse pressures of the Byzantine PPP structure, I am confident that London Underground and private contractors are more than capable of delivering the improvements to London's transport network on time and on

budget."

It is hoped that weekend and evening closures of the Northern line in London's West End, which had alarmed businesses, theatres and restaurants, could be avoided, as TfL said it would take a less disruptive approach when it begins to upgrade the service.

Budget problems

However recent reports of government cuts somewhat puncture this optimism. TfL's annual budget is £9.24 billion of which the Department for Transport (DfT) provides £3 billion. But with DfT facing cuts of between 25 to 40 per cent, funding for TfL could fall by between £750 million and £1.2 billion a year from its annual budget. There is also competition for funds from separate Crossrail projects. If TfL cannot find the money it may have to slow down the whole programme putting the upgrade to signalling at risk.

Perhaps TfL's property portfolio, director Charles Stafford, will provide a partial solution towards the savings of £5 billion needed. £160 million could be raised from consolidation of its 50 office buildings around London. These include offices at Baker Street, Buckingham Palace Road, Broadway and Edgware Road. It rents its present headquarters at Windsor House in Westminster, as well as the

The current state of work

Best off is the Victoria Line, still scheduled for completion in spring 2012. A new signalling system is in place and most of the work on renewing track and ventilation systems is complete. The last of 47 new trains, arriving at about one a fortnight from engineers Bombardier, is awaited.

The Metropolitan line will soon be running the first of its 191 new trains, complete with air conditioning. But without new signalling and track, the new trains will make little difference to journey times. Despite nearly £12 billion being spent since 2003 under the PPP arrangements, many of the improvements have been peripheral — new track on outlying sections, spruced-up stations — or else add-ons such as the Oyster system. The major work fell rapidly behind and costs ballooned.

The Upgrade to the Jubilee Line signalling system, designed by French electronics group Thales, originally scheduled for completion in December 2009, has also fallen badly behind due to system software problems. It is unlikely to be complete before February 2011.

Circle, District, Hammersmith and City Lines are promised £4.5 billion of investment over seven years with new trains (cost: £1.5 billion), and extended platforms to accommodate them. Work to signalling is to begin next year. Completion is expected in 2017.

New signalling for the Northern Line, dubbed the "misery line", is now at least two years behind schedule with only 10-12 per cent of the work done.

Work to the Piccadilly Line is three to four years behind schedule and the future is now very uncertain: the 2017 deadline is now seen as optimistic by insiders. As for the Bakerloo Line, the last line to be upgraded, it is now anyone's guess when that might happen.

Palestra Building in Southwark, where it moved in 2008, and Pier Walk, in North Greenwich, which it has occupied since last year.

In June TfL abandoned its plans to move into the Shard at London Bridge after the skyscraper's owners found tenants willing to pay a much higher rent. It said that the sale of the 30-year lease would contribute "a multi-million-pound cash sum" to its efficiency savings programme, but it would not disclose the amount.

Dire state of the transport network

Various newspaper reports have recently portrayed the dire state of a network in desperate need of investment. The out of date signalling is at the heart of the problem, according to Transport Commissioner Peter Hendy. The District line control room at Earl's Court still uses 1960s technology with household fans rigged up to keep the heat down. Mechanical levers powered by air pressure, are directed by hole-punch reels driven by Hewlett Packard HP1000s, a 1960s computer system discontinued a decade ago.

Two recent incidents give rise for concern: a broken-down train on the Victoria Line at Oxford Circus was one of the 10 brand new, fully automatic, £10 million rolling stock central to the Line's £900 million upgrade. After a year of testing they are still suffering computer software problems.

In August an engineering train on the Northern line doing early morning rail maintenance work near Archway, became detached from a train it was pulling and raced downhill through seven stations coming dangerously close to the train in front. It was only the uphill gradient at Warren Street that stopped it.

Work will not be completed in time for the 2012 Olympics.

London Underground's new managing director Mike Brown, has admitted that all these delays will mean that work on the Northern and Piccadilly Lines will not be completed in time for the 2012 Olympics. A former LU chief operating officer, Mr. Brown has spent the past two years running Heathrow Airport. ■

iPILLO!

Faith in the Coalition

Asked whether he had any religious belief, our new *Prime Minister* once replied that his faith was "a bit like the reception of **Magic FM** in the Chilterns. It sort of comes and goes".

Coal-burning electric cars will not be Green

The *Royal Academy of Engineering* claims that 10 new nuclear power stations will be required to convert Britain's vehicles to electricity. This needs to happen if we are to meet our emissions target.

The new Government is committed to a national recharging network but the Academy warns that a serious overhaul of the electricity network will be essential. "When most electricity in Britain is still generated by burning gas and coal, the difference between an electric car and a small, low-emission petrol or diesel car is negligible, they say. "The other big must-have is a smart grid – if you charge your vehicle at peak hours it is never going to be a green vehicle".

Carbon Capture does cost the earth

This headline in *The Times Eureka!* 'Greenwash' column caught Pillo's eye. CCS (Carbon Capture and Storage) or 'clean coal' is explained. It says that leading figures in the CCS industry privately admit that implementing CCS will cost close to £100 per household per year to implement. It concludes: "With the majority of the public unconvinced that man-made climate change is happening, the coalition leaders will be loath to admit that CCS needs more subsidy. The future of this potentially planet-saving technology will depend on their ability to obscure its true cost from sceptical electors".

Design review by some of Britain's ghastliest people

The *Chelsea Barracks* saga continues to attract comment, aided by its interesting Royal dimension. **Paul Finch** writing in the *AJ* denigrates the 'style-war' which seems to be at the heart of the demise of **Lord Rogers'** scheme.

"The pathetic references to the design being 'modernist', 'steel and glass' or 'concrete and glass' stems from the aesthetic attitudes of some of Britain's ghastliest people and their gruesome mouthpieces in the non-architectural media.

"It is an irony that the **Prince of Wales** would certainly feel more at home with the **Emir of Qatar** than with the xenophobic snobs who want to impose their very particular notion of tradition on society at large", says Paul.

Prescottian Dinosaur bites back

The same **Paul Finch**, one of your dear editors who also has a day job as Chairman of *CABE*, found himself under assault from another hack and bit back in his weekly *Letter from London* column in the *Architects' Journal*. Taking apart **Charles Clover's** ("a weekly rant in *The Sunday Times*") criticism of **Renzo Piano's** colourful *Central St Giles* replacement for

Power to shape our lives

"The Ancient Greek concept of gods and mysterious presences with overwhelming power to shape the lives of humans may seem ridiculous these days, but the idea of humans being in control of their own destiny is no less so.

"It is true that many phenomena once considered as divine manifestations have been explained scientifically, but

Renzo Piano goes all colourful at Central St Giles



we are still no nearer being able to predict, let alone control, the future. What has changed is that scientists have given us the false confidence that we are". – letter to *The Times*

Misfits make a World City

British Council for Offices had its first annual conference in London for 17 years. A highlight of two-days of CPD was the wisdom of City Planning Officer **Peter Wynne Rees** who, responding to the assertion that Shanghai can't attract enough creative and talented people to work there commented:

"As I explained to Beijing officials asking for tips on how to become a World City recently, it's simple. All you need to do is attract a multicultural population and have better gay bars. London is full of the world's misfits, like me, and it's misfits who lead change".

Required reading: **Richard Florida** *The Rise of the Creative Class*.