

Planning Committee Report

London Thames Gateway Development Corporation

The London Plan - Spatial Development Strategy for Greater London: Public Consultation Draft

Report of the Director of Planning

1. Purpose of this report

- 1.1 This report draws the Committee's attention to the replacement London Plan (Spatial Development Strategy) which has been published for consultation. It is available to view on the GLA website at www.london.gov.uk/shaping-london/london-plan. The consultation period ends on Tuesday 12th January 2010.
- 1.2 As the LTGDC does not have policy or plan making powers, it is essential that the interests of the Corporation are reflected wherever possible in emerging planning policy of the GLA to assist in the delivery of the Development Corporation's objectives.
- 1.3 This report highlights the main issues that officers consider should form the basis of the LTGDC response and also seeks any additional comments that Committee Members might have.

2. Decision required

- 2.1 That the Committee AGREE the suggested responses as highlighted in Section 5 of this report, along with any further comments that Members might agree. Also, as this item is being submitted as a late item to this Committee, Members may also submit additional comments up to 23rd December directly to the Director of Planning. Any additional comments will also be submitted to the GLA in consultation with the Chair of the Committee.

3. Background

- 3.1 The London Plan is one of three GLA statutory plans currently out to consultation, the other two being the Mayor's Transport Strategy and Economic Development Strategy. Together they form the main inputs into the economic and social development of London in the next 20 or so years.
- 3.2 The 2004 Plan of the previous administration was reviewed in 2008 and alterations published. At the time of the 2008 review, the view was taken that a new Plan should be produced given the age of many of the policies and new planning legislation which changed the status of the Plan. The Mayor also wanted to set out a clear spatial framework reflecting his policies and priorities as early as possible in a comprehensive manner. Initial proposals were published in April 2009 in a document entitled "A new Plan for London" which was reported to the Committee. The Plan sets out the spatial planning strategy for London up to 2031. Key policies focus on East London for new development and regeneration, building in part on the Olympics legacy, whilst also recognising that key indices of deprivation still apply after many decades.
- 3.3 The new document is more concise than the previous document and more user-friendly. The first chapter outlines the context for the Plan and policies, then there is a chapter on "Places" giving a clear spatial vision and then chapters on People (including housing and social infrastructure); Economy; Response to climate change; Transport; Living places and spaces and Implementation, monitoring and review. The content of policies falls under one or more of three headings:
- Strategic: strategically important statements of Mayoral policy
 - Planning decisions: policies to be applied by Mayor and the local planning authority in deciding applications
 - LDF preparation: advice to boroughs is in two categories – where particular circumstances require flexibility from the overall London approach and areas where a borough needs detailed analyses of local circumstances on which to base local policies for determining applications.

However, the policies must be taken as a whole and not in their individual parts. Key policy changes include the approach to affordable housing and changes to overall housing targets, a revised approach to climate change and a move away from maximising development to a more holistic approach including integrating physical and social infrastructure.

- 3.4 The purpose of this report is to highlight key policy areas of relevance to the Corporation.

4. The Chapters in the Plan

Chapter 1 – Context and strategy

- 4.1 The population of London is likely to steadily grow with key aspects being more younger and older people and greater ethnic diversity. Economic growth will continue the trend away from employment in manufacturing to jobs in business services. Other growth areas are expected to be in leisure and personal services, food, health, and education. Persistent problems of poverty and disadvantage mean London is an increasingly polarised city with East London still featuring high in terms of Indices of Multiple Deprivation. To help address this issue, the Olympic Legacy is expected to “effect a positive, sustainable and fully accessible economic, social and environmental transformation for one of the most diverse, yet deprived, parts of London.” Growth also needs to be supported by infrastructure improvements in the widest sense within different circumstances due to climate change.
- 4.2 The Mayor is looking for a more consensual approach to planning with all the relevant agencies. He sets out six detailed objectives which the policies in the various chapters are expected to support:
- A city that meets the challenges of economic and population growth
 - An internationally competitive and successful city
 - A city of diverse, strong, secure and accessible neighbourhoods
 - A city that delights the senses
 - A city that becomes a world leader in improving the environment
 - A city where it is easy, safe and convenient for everyone to access jobs, opportunities and facilities

Chapter 2 – London’s Places

- 4.3 This considers London’s relationship and role internationally, nationally and regionally. The boundaries of the London sub-regions are changed with them now being either side of the Thames rather than crossing it, as previously, so the Corporation’s boroughs fall within the Eastern sub region. They also fall into both Inner and Outer London, with Barking and Dagenham and Havering being in the latter.
- 4.4 Of the six objectives, two in particular apply:
- A city that meets the challenges of economic and population growth
 - A city that becomes a world leader in improving the environment
- 4.5 Use of land must not encroach on Green Belt or open spaces and not have unacceptable impacts on the environment. This requires “renewed

attention to the large areas of unused land in east London where there is both the potential and need for development and regeneration”.

- 4.6 Policy 3 is concerned with Growth Areas including Thames Gateway. Policy 4 is about the 2012 Games and Legacy with priorities to be set out in the OLSPG. The accompanying statement about the OLSPG is pertinent given the LTGDC’s work in the Lower Lea Valley area. It also sets up an interesting debate about the retention of Strategic Industrial Locations (SIL) as against the release of “appropriate industrial sites” given most of the industrial land is designated SIL:

“(It) will clarify and emphasise the need for a planned approach to regeneration and change, embed exemplary design and environmental quality, and help meet existing and new housing needs – especially for families. It will also consider social and community infrastructure requirements, set out how the areas around the Olympic Park can benefit from, and be fully integrated with, emerging legacy proposals, and promote the further managed release of appropriate industrial sites for mixed use development whilst still retaining key industrial land, particularly within established SIL.” “Successful, viable, and sustainable regeneration of the Olympic Park and its surrounding areas is the Mayor’s highest regeneration policy...” The LMF is to set out a 25 year vision to help achieve the Mayor’s ambitions. This is against the continuing socio-economic background in that the LTGDC area falls within the 20% most deprived Super Output Areas.

- 4.7 Policy 15 looks at Town Centres and their functions and how these might change depending on capacity, impact assessments, planning permissions etc. Stratford could move from Major to Metropolitan and Bromley by Bow from unclassified to District. Barking remains Major and East Beckton as District. Rainham, whilst remaining as District, is subject to monitoring. These functions should be tested through regular ‘health checks’.
- 4.8 Policy 16 considers strategic outer London centres. Barking and Dagenham and Havering are logistics centres and Stratford higher education.
- 4.9 Policy 17 relates to SILs. As in the current Plan, most locations are either Preferred Industrial Locations (PIL) or Industrial Business Parks (IBP) although some are both. The latter are the upper end of the market with a need for “better quality surroundings”. Those in, or adjacent to, our area are:

Beckton Riverside, PIL/IBP; British Gas Site/ Cody Road (part), IBP; Dagenham Dock/Rainham Employment Area, PIL; Fish Island/Marshgate Lane (parts), PIL/IBP; Hackney Wick (part) IBP; Rippleside and River Road Employment Area, PIL; Thameside East and West, PIL.

Release from SIL has to be done as part of a consolidation exercise through the OAPF or DPD process. SILs are seen as particularly important

in supporting logistics freight break bulk points. “In the Thames Gateway...there is particular scope for strategically coordinated consolidation and/or reconfiguration of parts of some SILs.”

- 4.10 Policy 18, the final one, deals with strategic open space including Lee Valley Regional Park and East London Green Grid.

Chapter 3 – London’s People

- 4.11 This chapter focuses particularly on social infrastructure and housing issues.

- 4.12 Key objectives are:

- A city that meets the challenges of economic and population growth
- A city of diverse, strong, secure and accessible neighbourhoods
- A city that delights the senses

- 4.13 Policies 3.1 and 3.2 look at wider issues of ensuring equal life chances for all and addressing health inequalities. For the latter, understandably the role of housing is highlighted. The provision of a range of housing types supported by appropriate social infrastructure “will be a particular priority”. The boroughs must also address existing backlogs in housing need.

- 4.14 Not surprisingly, given Policy 3.2, Policy 3.3 is about increasing housing supply. The Mayor is looking for an annual average across London of 33,400 additional homes, to be reviewed by 2015/16, with an annual target for each borough. Targets only apply up to 2021, hence review in 2015/16 as otherwise the period of some LDFs would go beyond that date and not be covered by a GLA target. The annual figure is slightly above that in the 2008 document but less than that in the previous Plan, and is based on detailed information from all of the boroughs.

- 4.15 Policy 3.4 looks at optimising housing potential informed by a density matrix based on PTALs. There is a broad range of densities in each category so planning authorities can take account of other relevant factors to optimise potential e.g. social infrastructure, open space and play and future public transport improvements. High densities do not automatically require high rise development. A separate housing SPG will provide further guidance on implementation of the policy. Car parking provision is set out in Chapter 6.

- 4.16 Policy 3.5 is concerned with the quality and design of housing developments and introduces space standards and developers should state number of occupants not simply number of bedrooms. Also need to satisfy requirements as to lifetime homes, climate change and social inclusion. These and other good aspects of design for all housing tenures will be addressed in a new housing SPG. Exemptions will only be considered where you have exemplary design and make significant

contributions towards achievements of other Plan objectives. Furthermore, under Policy 3.7, large residential developments (sites over 5 hectares or 500 dwellings plus) should be subject to a planning framework to help deliver a sustainable community.

- 4.17 Policy 3.8 – Housing choice. Considers sizes, types, tenures including supported housing and students, Lifetime Homes, and wheelchair accessible. Also need to improve quality of private rented stock. These aspects are to be assisted by guidance from the Mayor.
- 4.18 Policies 3.11 to 3.14 are concerned with different aspects of affordable housing. These include:
- affordable housing targets and the Mayor is seeking 13,200 more homes over the Plan period with 60:40 split, rented to intermediate. LDFs are to set overall target reflecting local need, including promotion of mixed and balanced communities
 - negotiating affordable housing on private and mixed use schemes. The “maximum reasonable amount” is to be sought with regard to various criteria including “need to encourage rather than restrain residential development” and “specific circumstances of individual sites”. Expected to maximise grant funding subject to certain exceptions (SPG to be published on this). Also on site provision will normally be expected. Specific reference to use of overage and viability
 - the threshold for requiring affordable housing is set at 10 units and over and the boroughs are encouraged to use their LDF to set lower threshold where justified e.g., large dwellings in terms of floor space.

Chapter 4 – London’s economy

- 4.19 There is a focus on a transition to a low carbon economy and promoting outer London as a location for national government and business.
- 4.20 The particular objectives are:
- a city that meets the challenges of economic and population growth
 - an internationally competitive and successful city
- 4.21 Policy 4.4 considers managing industrial land and premises. A “rigorous approach” to land management aligned to managed release of land is expected. LDFs to focus on SIL and LSIL (Locally Significant Industrial Sites) and related need for waste, transport, logistics and wholesale uses based on accessibility to strategic road network. Also recognises release can meet strategic and local requirements for housing and social infrastructure. The scope for release is still greatest in East London.

- 4.22 Policy 4.7 covers retail and town centre development. The focus is to be on sites in existing centres or on the edge, if integrated with the centre and good public transport. Usual caveats as to out of town centres and need to reduce car dependency. Policy 4.9 provides support for the provision of small shops. Where authorities are considering large retail developments, they are expected to use S106 to secure affordable small units.
- 4.23 Policy 4.10 focuses on new/emerging economic sectors. It promotes affordable premises for innovative firms, looks to the role of higher and further education to foster innovation and the particular significance of green businesses and the Green Enterprise District in Thames Gateway.
- 4.24 Policy 4.12 promotes improving opportunities for all e.g., skills, education/training, childcare to release mothers, start up units. Very much linked to delivery of the Mayor's Economic Development Strategy. Underpinning this should be good access for local communities by foot, cycle, and public transport.

Chapter 5 – London's Response to Climate Change

- 4.25 This chapter updates the current climate change and energy policies and brings forward the target of 60% carbon emissions reduction from 2050 to 2025 whilst maintaining the current energy hierarchy.
- 4.26 The key objective is:
- A city that becomes a world leader in improving the environment.
- 4.27 The initial set of policies cover a wide range of initiatives which build on previous policies and guidance including climate change mitigation, sustainable design and construction, retrofitting, decentralised energy networks, renewable energy with minimum targets, innovative energy technologies, cooling hierarchy for major developments linked to sustainable design and construction principles.
- 4.28 Several policies then deal with flood risk management, sustainable drainage, water quality, use and supplies and sewerage infrastructure.
- 4.29 Finally various policies (5.16 – 5.19) deal with aspects of waste. Need to manage as much of London's waste within its boundaries as practicable and separately the GLA issued this week new apportionments of waste streams for each of the boroughs. Boroughs can collaborate and pool apportionment requirements. The Mayor is seeking zero waste to landfill by 2031 plus reuse of, and reduction in use of, materials, exceeding recycling/ composting levels in municipal solid waste and exceeding recycling and reuse levels for construction waste. Also waste to energy will be important provided new technologies are used. To accommodate the changes in how waste is to be dealt with, LDFs must allocate sufficient land and identify facilities for waste management. Existing site loss must

normally compensate with maximum achievable throughput of that site. It is expected that SILs will provide the major opportunities for locating waste treatment facilities. For treatment of non recyclable waste, the Mayor expects even advanced systems to be evaluated by carbon outcome (end to end). He wants to agree with boroughs a common tool for measuring and determining minimum greenhouse gas performance for technologies recovering energy from non-recyclable waste. Also, new facilities must be well designed and need not be bad neighbours. For construction, excavation, and demolition waste, the focus is on using existing waste sites including safeguarded wharves and use water or rail whenever possible. In respect of hazardous waste, changes in definition means amounts will grow in short and medium term. Need sites for regional as much as local facilities. Boroughs and various agencies must work together.

Chapter 6 – Transport

- 4.30 Policies aimed at helping deliver the sixth objective that London should be:
- A city where it is easy, safe and convenient for everyone to access jobs, opportunities and facilities
- 4.31 The main source of policies in this Chapter is the Mayor's Transport Strategy, with six thematic goals which are:
- a) Support economic development and population growth
 - b) Enhance the quality of life for Londoners
 - c) Improve the safety and security of all Londoners
 - d) Improve transport opportunities for all Londoners
 - e) Reduce transport's contribution to climate change and improve its resilience
 - f) Support delivery of the 2012 Olympic Games and its legacy
- 4.32 Policy 6.1 sets out the strategic approach to working with all relevant partners to encourage closer integration of transport and development especially reducing the need to travel by car. It recognises challenges from London's extended labour catchment area. Future policies, proposals and projects need to support spatial priorities in Chapter Two, including
- development and continued growth of inner London in ways that improve the quality of local environments and enable deprived communities to access jobs and other opportunities and facilities that they need

- sustainable development of new communities in East London, to support the successful delivery of the 2012 Games and secure a lasting legacy
 - development of the Opportunity Areas and Areas for Intensification
- 4.33 Policy 6.2, which is particularly relevant for the LTGDC area and is expanded on in the report on the Mayor's Transport Strategy, looks at providing enhanced public transport capacity and safeguarding land for private transport, including freight. Also wants to promote the movement of freight by water.
- 4.34 Policy 6.5 specifically deals with funding Crossrail and other strategically important infrastructure. The Mayor is to provide guidance on planning obligation contributions. There is a very strong statement as to the justification for helping to fund Crossrail. He may consider other projects subject to consultation.
- 4.35 Policy 6.7 is concerned with buses, bus transits, trams and comprises general statement about working with everyone to implement London wide improvements to services.
- 4.36 Policy 6.12 on road network capacity accepts that whilst there is limited capacity, there will also be cases where new roads are needed for regeneration. "The Mayor is investigating the possibility of additional river crossings in East London".
- 4.37 Parking standards for cars, cycles and delivery/servicing areas are set out in Policy 6.13 and associated Tables. The GLA will promote car free schemes in high public transport accessible areas. Where town centres need upgrades, some flexibility is offered with regard to spaces which can be calculated on a centre wide, rather than individual site, basis.
- 4.38 The final two policies are concerned with freight distribution. The Mayor expects boroughs to use their LDFs to safeguard existing and identify new sites for rail/water use, safeguard railheads for aggregates and identify break bulk sites. Also provides support for strategic rail freight interchanges, including use of CTRL link.

Chapter 7 – London's Living Places and Spaces

- 4.39 This chapter is one with a key change in approach, namely the move away from maximising development potential and looking more at the integration of neighbourhoods and high levels of access to community infrastructure. This chapter covers a broad range of policy areas impacting on how people perceive and use the places they live and work in and visit.
- 4.40 The key objectives are:
- A city of diverse, strong, secure and accessible neighbourhoods
 - A city that delights the senses

- 4.41 The first policy is key to successful sustainable regeneration – building London’s neighbourhoods and communities. New developments are to be designed to improve access to community infrastructure, commercial services and public transport and maximise opportunity for community diversity, inclusion and cohesion whilst contributing to people’s sense of place, safety, and security.
- 4.42 Policies 7.6 and 7.7 are concerned with architecture, including tall buildings. Buildings generally must be of the highest quality and make a positive contribution to a coherent public realm, streetscape, and wider cityscape including sustainable design and construction and being consistent with existing or planned future capacity of social, transport, and green infrastructure. Tall and large buildings will require urban design analysis and generally be restricted to the Central Activity Zone, Opportunity Areas, Areas of Intensification, and Town Centres with good public transport.
- 4.43 A range of policies relating to improving air quality, reducing noise, safeguarding Green Belt, Metropolitan open land, and local spaces and biodiversity are non controversial.
- 4.44 Policies 7.24 – 7.28 promote the Blue Ribbon Network (BRN) and its multi-functions - source of water, drainage, and flood but also habitats and recreational opportunities and important landscapes and views. Also want to increase the use of the BRN for freight transport. Must protect safeguarded wharves unless not viable and criteria are set out. The designation of wharves is to be reviewed prior to 2012. Also, where close to navigable waterways, boroughs should seek to maximise water transport for bulk materials, especially during demolition and construction phases. It is recognised that many wharves are in Opportunity Areas and the challenge is to minimise conflict between old and new uses. The Thameside West study is a good example of how these challenges might be addressed.
- 4.45 There is a specific policy for the River Thames. Development proposals are to be consistent with relevant Thames Policy Area appraisal produced as part of LDFs (guidelines provided). Thames Tideway Sewer Tunnels are expected to minimise impacts on the river, maximise water-based freight and consider permanent uses for any required jetties etc.
- 4.46 Four policies cover Implementation, Planning Obligations, Community Infrastructure Levy, and monitoring/review. The Mayor is looking to work collaboratively to enable new development, optimising land use and promoting/enabling locations for strategic development. He will provide guidance to boroughs and other partners on Obligations to reflect strategic priorities. These relate to affordable housing; Crossrail and other public transport improvements; climate change; learning and skills; health facilities and services; childcare provision, and small shops.
- 4.47 For monitoring and review he will use 24 Key Performance Indicators with compliance reported in Annual Monitoring reports. The Mayor will produce

an Implementation Plan and actions are set out in a table. In the final London Plan, this table will be removed as the Implementation Plan will have been published. Actions include production of OLSPG and OLMF; revise and produce various SPGs; update Safeguarded Wharves Implementation Report; various sewage and water proposals, and actions regarding climate change including London Heat Map Tool and supporting decentralised energy networks.

5. The proposed LTGDC response

- 5.1 LTGDC officers welcome the reduced size of the Plan and the improved layout of, and subject matters contained within, the individual chapters in the Plan. None of the policies in themselves run contrary to the main priorities of the LTGDC in helping to deliver sustainable regeneration in and around its area. Some of the changes in fact assist, as well as reflect, the approach to planning and regeneration taken by the Corporation. The challenge comes in agreeing the appropriate prioritisation and funding of a range of interventions that are critical to helping bring forward that regeneration – a theme that is common to the other two strategic documents being consulted on.
- 5.2 Much is correctly made of the opportunities and challenges that exist in East London and in particular the opportunity that the Olympics legacy presents. The Plan, reflecting Central Government objectives, sets challenging targets for delivering new homes and jobs. However many of these new homes and jobs, especially if sustainable communities are to be created, require investment in public transport infrastructure such as the extension to the DLR to Dagenham Dock, further bus services and crossings across the Thames along with social infrastructure. Whilst the latter requires funding from a multiplicity of agencies, the Mayor plays a key role in public transport improvements and improving the ability of vehicles to move around East London and connect to other parts of London. The cancellation of the Thames Gateway Bridge and lack of funding for the DLR extension are particularly regretted. Whilst discussions are commencing as to new river crossings in East London, the urgency needs to be fully recognised. The Corporation would welcome the opportunity to work with Mayor and the relevant boroughs to look at how key transport infrastructure improvements might be brought forward to ensure that hindrances to delivering significant numbers of new homes and jobs within sustainable communities are minimised. The provision of these new sustainable communities is important not just in itself but is also fundamental to helping to narrow the deprivation gap in East London. The existence of, and issues relating to, that deprivation gap and the necessary move towards 'convergence' are commented on in various parts of the Plan and welcomed.

- 5.3 Linked to the opportunities and challenges in East London, the LTGDC looks forward to continuing to play an important role with other partners in producing the OLSPG as the basis of helping to deliver much of the potential for regeneration in the Lower Lea Valley area. However, the proposals in the OLSPG must provide clear benefits to the existing communities in the various boroughs in the area as well as new residents, in order to help deliver proper sustainable communities. This will include identifying the various funding streams required and not depend too much on receipts from the sale of development plots within the Olympic Park area.
- 5.4 The opportunity to help consider which SILs remain and what alternative uses might occur is welcomed. There also needs to be a recognition that the designation of SILs does not necessarily mean that the types of activities traditionally associated with SILs will continue to predominate in these areas and that opportunities for more 'neighbourly' activities are needed and are occurring.
- 5.5 The designation of the Green Enterprise District is fully supported and the LTGDC has already taken a lead with the development of its Sustainable Industries Park and associated Institute for Sustainability. This also provides the opportunity to bring forward waste to energy schemes using the latest technology.
- 5.6 The potential for the upgrading of the retail function of Bromley by Bow and Stratford is fully supported.
- 5.7 Clarity is required in respect of Policy 4.7 on retail and town centre development. The wording has changed from the relevant policy in the previous Plan and now allows for edge of centre sites to be considered if access to the centre is good. This could adversely impact on the core of centres and also create uncertainty as to what might be provided on the edges.
- 5.8 There needs to be a safeguard in the policy regarding the funding of Crossrail to ensure other key local infrastructure improvements to help regeneration are not prejudiced by an absolute prioritisation of funds for that project, important as it is.
- 5.9 Reference is made at various points in the Plan to policies being supplemented by further guidance. It would be useful to provide a schedule detailing all of the proposed supplementary guidance and when they are to be published.

6. Recommendation

That the Committee AGREE the suggested responses, as highlighted in Section 5 above, along with any further comments that Members might agree. Also, as this report is being submitted as a late item to this

Committee Members may also submit additional comments up to 23rd December directly to the Director of Planning. Any such additional comments will also be submitted to the GLA in consultation with the Chair of the Committee.