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Our  
reference:  
Your  
reference:  
Date: 22 June 2009

Dear Andrew

## **London Councils Response to 'A New Plan for London' - Proposals for the Mayor's London Plan**

London Councils represents the 32 London boroughs, the City of London, the Metropolitan Police Authority and the London Fire and Emergency Planning Authority. We are committed to fighting for resources for London and getting the best possible deal for London's 33 councils. We lobby on our members' behalf, develop policy and do all that we can to help boroughs improve the services they offer. We also run a range of services ourselves designed to make life better for Londoners.

London Councils has produced a response to the specific proposals contained within each chapter of 'A New Plan for London', in addition to responding to some of the individual questions that the Mayor has requested additional feedback on. However, London Councils also has some general comments regarding the overall direction and structure of 'A New Plan for London' and the arrangements for strategic planning in London which we would like to take this opportunity to highlight.

### **1. The role and function of the London Plan**

London Councils believes that the London Plan should be a high level, truly strategic document which sets out the overarching spatial vision for London as a whole, with clear direction and purpose with an emphasis on place shaping. As it currently stands, 'A New Plan for London' does not provide the level of strategic vision and guidance that London Councils would like to see, nor does it offer much that is new so does not represent a real departure from the previous London Plan. The Mayor should identify how the strategic planning system can also be used to support boroughs as opposed to being a tool to impose Mayoral priorities on local matters which are the responsibility of the boroughs to decide. London Councils believes that the Mayor still needs to demonstrate how he will use his planning powers to provide the leadership that is necessary to make a real difference to Londoners and clearly set out areas which he believes to be strategic issues about which he will wish to take a direct interest.

## **2. Determination of local issues**

The London Plan should concentrate on areas where strategic guidance is needed and should not stray into areas which are better determined at a local level. Discussions should take place with boroughs regarding areas where they require greater strategic guidance and this should be taken into account when determining the production of Supplementary Planning Guidance, Best Practice Guidance and the other documents that sit beneath the London Plan. This work should be guided by the principle that boroughs are responsible for taking the decisions regarding developments in their areas and, excepting the occasions where there is a strategic concern, should be able to take these decisions without interference from the GLA. Furthermore, the Mayor and the rest of the GLA family should exercise greater flexibility in the application of targets and policies in the London Plan in order to reflect and adapt to different local situations and development proposals.

## **3. Partnership working with boroughs**

London Councils believes that the Mayor should agree a framework for planning, in order to support better partnership working with the boroughs on planning matters, in line with the commitments made as part of the City Charter process. London Councils believes that this framework should be based around four key criteria:

- Agree a clear definition as to what constitutes “strategic” where the Mayor will wish to intervene in applications and a commitment not to intervene in matters not defined as “strategic”.
- A schedule as to what issues require “strategic guidance”, with the remainder left for local determination
- A commitment that Section 106 planning agreements will be determined by boroughs, wherever the application is determined
- A commitment to a single GLA family case officer in dealing with boroughs during the progress of planning applications

## **4. A London Plan for the whole of London**

London Councils believes that the London Plan needs to be a plan for the whole of London that is not constrained by artificial boundaries or definitions. While the work of the Outer London Commission is welcomed as there has been a lack of acknowledgement of the challenges facing Outer London in the past, it is important not to treat Outer, Inner, and Central London as entirely separate entities. Many Outer London boroughs experience similar problems as Inner London boroughs, conversely many Inner London boroughs have areas which share similar characteristics to parts of Outer London and parts of Central London. Furthermore, the economic inter-relationship between Central, Inner and Outer London should be recognised so that they complement each other to provide economic growth and opportunities that benefit London as a whole. London Plan policies need to work for the whole of London, but solutions for individual local areas need to be developed by boroughs. This is an area where a ‘bottom up’ as opposed to ‘top down’ approach is vital.

## **5. Linkages to Mayoral policy documents, strategies and decisions on investment priorities**

The London Plan must be clearly linked to other Mayoral strategies, not only the Transport Strategy and the Economic Development Strategy but also the Housing Strategy and statutory environmental strategies, in particular the Waste and Air Quality strategies, which will form an essential part

of delivering the climate change adaptation and mitigation objectives as well as an improvement in local environmental quality.

The Transport Strategy should identify the transport schemes necessary to support growth and this should align with future TfL Business Planning processes to ensure that areas identified for significant population and employment growth are supported by the necessary transport investment, including major schemes where appropriate. The process of identifying transport requirements must be done in conjunction with the boroughs and should include areas where there is currently poor connectivity but where transport investment could unlock growth potential.

The London Plan should also align with the Economic Development strategy and the LDA investment priorities to ensure that targeted investment can be used to support growth, particularly in areas that are identified as providing opportunities to attract new types of commercial activity. Furthermore, the London Plan should clearly link to the Housing Strategy and the Mayor should use his influence with the Homes and Communities Agency to ensure that investment in housing is aligned to London Plan priorities.

The Mayor must develop an infrastructure delivery plan which clearly sets out how infrastructure investment will match proposed growth. This needs to identify what infrastructure is required and when the necessary investment is likely to be available. If the infrastructure needed to support growth is not likely to be available in the required timescale, consideration must be given to phasing of development to avoid unacceptable levels of pressure on the transport network and existing public services.

## **6. An emphasis on development and growth without compromising quality of life for London's residents**

London Councils is very concerned that the London Plan does not simply take a 'plan by numbers' approach but is guided by the principle of achieving sustainable planning and growth that acknowledges the characteristics, problems and challenges of individual parts of London.

A clear strategic framework needs to be in place to secure sustainable communities and investment in the infrastructure necessary to support them. There are particular challenges, such as the need to invest in health services and tackling the severe shortage of school places, where strategic leadership will be essential. It will be necessary to ensure that growth is accompanied by appropriate investment in order to support sustainable development. This will play an important role in achieving greater acceptance for growth plans, as residents may be more willing to accept growth if they know that adequate investment will be made available to reduce pressure on local services.

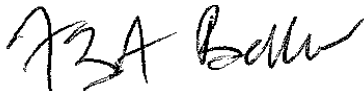
However, it is also important to ensure that the GLA does not become involved in issues best left for local determination. Boroughs are best placed to identify the problems and challenges that proposals will place on their areas and the solutions needed to resolve them. London is a city with a large diversity of neighbourhoods, communities, facilities and infrastructure and each area presents its own individual challenges. Local determination means that unique local circumstances can be taken into account and help to ensure that growth does not have a detrimental impact on the quality of life for local residents.

London Councils would welcome the opportunity to have further discussions with the GLA regarding how these priorities can be achieved and also how the GLA can effectively

engage with boroughs on matters related to the review of the London Plan in the period up to the public consultation.

The London Councils response to the policies and consultation questions contained in the individual chapters of 'A New Plan for London' is attached as an Appendix to this letter. London Councils would be happy to discuss any issues raised in this response. If you would like to discuss any aspects of this submission in further detail, please contact Ruth Bradshaw (ruth.bradshaw@londoncouncils.gov.uk or 020 7934 9909)

Yours sincerely

A handwritten signature in black ink that reads "Faraz Baber".

Faraz Baber  
Programme Director – World City  
London Councils

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## **Chapter One – Planning for a Changing London**

### **General Comments**

#### **Continued Population Growth**

London Councils has in the past made representations to the GLA setting out concerns over the potential impact of the London Plan's patterns of population and economic growth projections, and is wary of basing inflexible planning too closely on these. Population projections into even the near-future are difficult to make with any accuracy and should incorporate sufficient flexibility to account for unanticipated changes. London Councils is concerned that 'A New Plan for London' continues to suggest a 'predict and provide' approach, whereas London Councils would prefer a strategy that takes a pragmatic approach and bears projections in mind whilst shaping development rather than simply following the projections. There is an absence of planning for any alternative scenarios, both in terms of population and employment growth which London Councils believes should be an important part of the process of reviewing the London Plan.

#### **A Changing Population**

'A New Plan for London' notes the increase in the numbers of Londoners of school age and paragraph 22 states that: "Between now and 2031 we will have to plan for the schools and other facilities needed by a growing number of younger people". London Councils believes that the Mayor needs to make it a priority to work with boroughs to plan for more school places, as a matter of urgency. However, it is important that boroughs are able to identify sites for location of schools without unnecessary interference from the Mayor regarding where these schools are located.

London Councils has assembled evidence from every London local authority which indicates that, based on current projections, London faces reception place shortfalls of more than 18,300 in total by 2014<sup>1</sup>. This financial year alone, more than 2,250 children will be without a reception place, and councils are being forced to consider a range of emergency temporary measures to accommodate these children. This is a critical problem which needs to be addressed now and London Councils has already written to the government, calling for an emergency capital funding grant, so that new places can be built. London Councils would welcome the Mayor of London's support in encouraging the Government to recognise the need to identify a long term funding solution to this problem.

#### **Continued Economic Growth and Success**

London Councils has in the past raised concerns that projections and plans for London's growth have very much been based on the continued growth of the financial services sector. Given recent world events and the problems currently being faced within financial services, there is increasing evidence to suggest that the economy is going through a period of structural change. It is therefore important that the process of reviewing the London Plan is forward looking and takes the opportunity to identify future growth sectors. It is also extremely important to ensure a diversity of employment opportunities within London and there need to be a broader understanding of economic patterns for all the different sectors of employment and their current and future land requirements. Linkages

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<sup>1</sup> 'Do the Maths – Tackling Shortages of Primary Schools Places in London', London Councils, April 2009.

with the Economic Development Strategy and the LDA's investment priorities will be a critical element of this work.

There is also a need to manage any loss of employment land to other uses, specifically housing to ensure the future needs are not jeopardised. Additionally, it is necessary to consider whether the present locational 'offer' is adequate to provide for growth sectors, such as new 'knowledge industries' and the new 'green economy'. This will be essential to assist outer London in attracting more employment, particularly some of the type of growth that has preferred to locate beyond London. The longer term implications of the international economic slowdown must be recognised through ensuring that the future approach to economic and employment growth is flexible.

### **The Mayor's New Approach to Planning**

London Councils welcomes the Mayor's commitment to developing a more consensual working relationship with boroughs and the City Charter process has an important role in achieving this. It is hoped that this commitment will extend across the GLA family on all issues, not only planning. It is essential that the Mayor, the boroughs and all parts of the GLA family work together to deliver the policies, direction and services that London needs and boroughs must be treated as an equal partner in this process. One key concern that London Councils has is regarding the use of the Mayor's planning powers, and we seek reassurances that the Mayor will limit use of his ability to call in applications to situations where there are critical strategic issues that are not being addressed. The recent Mayoral intervention in planning applications seeking additional contributions for Crossrail has caused boroughs some concern as it appears to conflict with the overall commitment to greater partnership working and recognition of the role and responsibilities of boroughs as planning authorities in their own right.

## **Chapter Two – London's Places**

## **General Comments**

### **Looking Beyond London**

London Councils welcomes the recognition of the need to ensure greater joined up working with the organisations responsible for strategic planning in the Greater South East. However, we believe that the London Plan needs to be a little less 'inward looking' and give greater consideration to the role of London as part of the Greater South East.

There is a real need to ensure greater joined up working with the South East and East of England regions, building on the Mayor's statutory requirement to engage beyond London, as identified in the GLA Act section 348 and Government Office for London Circular 1/2008. There needs to be greater emphasis on inter-regional issues, in particular:

- Accommodating pressures for housing growth
- Commuter movement through outer London to places of employment
- Competition of employment and commercial areas with outer London locations
- Town centre development
- Pressure on green spaces and urban fringe/green belt matters
- Future transport needs, including encouraging travel across inter-regional boundaries by sustainable means.

The need to plan for appropriate transport linkages to support the planned expansion of Stansted airport is an important part of this exercise. The Outer London economy is very closely linked with the regions beyond London and this issue needs to be given greater consideration. Several outer London boroughs have raised concern about the competition for growth that their town centres face from employment and retail development outside of the Greater South East, and these concerns must be explored.

London Councils is unconvinced that the existing arrangements for discussion of inter-regional issues, through the Inter-Regional Forum, is as effective as it should be in facilitating joined up discussions on issues of key inter-regional importance and would welcome the opportunity to discuss with the Mayor ways in which this could be addressed.

### **Sub Regions**

London Councils and the boroughs welcome the revisions to the sub-regional boundaries and proposed more flexible approach to different sub-regional groupings for particular purposes. It is wholly appropriate that boroughs have had and will have a greater opportunity to determine which sub-regional groupings are most suitable for specific issues and the Mayor and the GLA family should both acknowledge and work in co-operation with these groupings.

### **Outer, Inner and Central London**

The proposals listed in 'A New Plan for London' include a stronger emphasis on recognising different parts of the city, particularly outer and inner London (outside the CAZ). This is a welcome development in the revised plan, especially the proposal to give full consideration to the recommendations of the Outer London Commission. However, it is important that the need to look at London as a whole is considered and there should be clear statements regarding how Central, Inner and Outer London operate as a whole as well as on their different roles and functions.

In particular, a greater understanding of the role and vision for Outer London is needed. London Councils appreciates that the work of the Outer London Commission is still ongoing and the public consultation version of the London Plan will be informed by its findings. However, the indications from the Outer London Commission are that there will be a focus on development in a small number of strategic Outer London development centres and London Councils is unclear how these will relate to the rest of London as a whole. Without this it is difficult to gain an understanding of how the Mayor views the future of the suburbs and their role and function and their wider relationship with London as a whole.

London Councils supports proposals to offer greater appreciation of the social, environmental, transport and other quality of life issues affecting Outer London but would appreciate greater detail about how this will be achieved. As outlined in our recent 'Successful Suburbs' report we would like to see proposals made for a policy of investment in town and district centre improvement programmes, by better combining the work of local authorities, developers and London-wide strategic bodies, particularly TfL, (which may result from the findings of the Outer London Commission).

London Councils also requests that policies guiding the development of the Central Activities Zone also reflect and respect the residential nature of the CAZ and ensure that the needs of the residents in these areas are also taken into account when working on policies and planning frameworks for these areas.

### **Town Centres**

London Councils believes that the London Plan should give greater recognition to the role and function of London's town centres as areas of growth. There is a need both to recognise and to support the key role that London's town centres perform and to seek to address the decline that some town centres have been suffering. It is particularly important that any proposals to develop a small number of strategic outer London development centres complement and do not conflict with plans for town centre enhancement, and that these proposals are developed in partnership with London boroughs. Achieving a balance of growth should be a key objective of the London Plan.

Many town centres have the potential to accommodate greater levels of growth than is currently the case. The Mayor should work in partnership with boroughs to identify the infrastructure that will be needed to support growth in town centres and assist in creating a vibrant, successful and modern network of suburbs surrounding these town centres. Adopting a 'town/neighbourhood centre first' policy for provision of services is an important part of creating these areas. In addition, a key factor will be identifying the transport requirements that will be necessary to support this growth and the development of orbital linkages connecting town centres is critical. London Councils is aware that both the Mayor and TfL have expressed reservations about a proposed orbital rail network for Outer London. However, improved orbital linkages could be achieved through small scale improvements to the rail network, supported by improved bus network planning and the introduction of fast and semi fast services which could provide necessary links, fill in existing gaps and help to create an orbital route network. London Councils would like TfL to engage in further discussions with boroughs regarding how aspirations for an orbital transport network can be achieved.

London Councils also notes that, in addition to town centres this Chapter also refers to opportunity areas, intensification areas, regeneration areas, strategic Outer London

development centres and strategic and other industrial locations. London Councils does not propose to comment on these issues in detail but the London Plan must make it clear how these various areas and locations inter-relate and how they contribute to London as a whole.

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## Chapter Three – London’s People

### General comments

#### Housing Supply

London Councils recognises the role of the Mayor in providing strategic guidance for the provision of pitches for Gypsies and Travellers. We have welcomed the consultative approach taken on this issue by the GLA to date and believe it lays the ground work for success. We would ask that this open and inclusive approach continues throughout the process of discussing and agreeing individual borough targets.

Boroughs have expressed concern that the method of monitoring vacant properties returning to use will change from assessing numbers of privately owned vacant properties to vacant properties of all tenure types. Aside from this duplication of monitoring that is undertaken elsewhere by the Audit Commission, it is felt that monitoring this separately would place an impractical burden on borough officers.

In addition, large numbers of units of social housing are at times (quite rightly for good management reasons) purposely left vacant (due to health and safety and work sequencing issues) during estate renewal programmes which is vitally important in the regeneration of deprived neighbourhoods, and therefore it would not be appropriate to include these units in the vacant property returning to use monitoring as it would present an unfairly distorted performance picture and would penalise those boroughs with extensive estate renewal programmes and potentially build in additional costs.

London Councils broadly welcomes the revised plan’s proposals to enhance the quality of new homes in London, and to provide more family-sized housing. Our recent report ‘Successful Suburbs’ called for the reintroduction of the Parker Morris internal space standards for housing<sup>2</sup>. We anticipate that the proposal in ‘A New Plan for London’ to place greater emphasis on internal space will result in the adoption of similar specific space standards. In addition to this we recognise the importance of promoting lifetime homes and wheelchair accessible homes to meet the needs of London’s changing and growing population and in particularly a projected numerical increase in older and disabled people in London.

We also welcome the move from an emphasis on maximising housing density to optimising housing densities. Local authorities in their role as place-shapers are best placed to understand the diversity of character in their neighbourhoods and ensure that proposed developments enhance their surrounding and provide the types of accommodation needed by residents.

Furthermore, although the Mayor’s policy to protect back gardens from development is generally supported, it must be acknowledged that this will have an impact on the ability of boroughs to meet future housing need, particularly those who have, in the past, delivered a significant proportion of housing through this method. Such development proposals will

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<sup>2</sup> The Parker Morris space standards were drawn up as part of the 1961 report *Homes for Today and Tomorrow*. The report recommended a series of minimum space standards which later became compulsory for all housing in New Towns (from 1967) and council housing (from 1969). Our Successful Suburbs report calls for the reintroduction of these standards.

need to be assessed on their individual local circumstances and as such it is appropriate that boroughs will still retain discretion on these planning decisions.

### **Affordable Housing**

The proposal in 'A New Plan for London' to remove the 50 per cent target for affordable homes in new developments is broadly supported by boroughs, although there still exist a range of practical delivery concerns among some local authorities. The aspiration of the Mayor to reach replacement (individual borough) numerical targets through a process of discussion and negotiation with London's boroughs is also broadly welcomed. However, borough planning officers have expressed the view that the very solid and certain nature of the previous 50 per cent target presented an advantage for local authorities when initiating section 106 negotiations with developers. It has been noted that the proposed numerical targets do not offer the same certainty at the start of the negotiation process.

Some boroughs have also expressed concern that they have not been able to fully engage in discussions with the Mayor over their targets due to delays at City Hall, which has delayed the overall target setting process. In future we ask that adequate time and resources are made available at the GLA to support timely, appropriate and effective negotiations.

London Councils accepts that the proposal to use the SHLAA and SHMA to reach indicative targets for affordable housing represents a helpful methodology for calculating target figures, but stresses that this should only be used as a starting point for discussions with boroughs. In addition, we would like the Mayor to offer greater clarity about how the GLA's numerical affordable housing targets will work in conjunction with the LAA regime in the future where boroughs have selected NI 155 (number of affordable homes delivered). For this LAA round some boroughs find themselves in the unusual situation of having two different targets. It would be appropriate for boroughs, the GLA and GoL to discuss how this situation can be avoided in the future.

### **Responses to Specific Questions**

#### **Is there an area of social infrastructure not covered here that needs to be?**

'A New Plan for London' does make an important link between the provision of housing and of social infrastructure, but it is unclear how this infrastructure will be funded and delivered. The Mayor's recent proposal to seek developer contributions for Crossrail from certain categories of development in the Central Activities Zone and the Isle of Dogs will impact on the ability of these boroughs to collect planning obligations for other priorities, including social and community infrastructure.

In addition, there is a need to ensure that housing growth is supported by the provision of adequate transport infrastructure and clear links to the Mayor's Transport Strategy and TfL Business Plan are vital. This should also consider the need for public realm improvements and infrastructure needed to support an increase in more sustainable modes of transport, such as walking and cycling. It is also important to remember that there are parts of London where access to public transport connections remains poor and where it is important to identify and promote transport solutions to address this in order that the potential of these areas can be unlocked.

**Is the proposed approach to social infrastructure right? Is there a better approach?**

The London Plan review process offers an opportunity to develop a London-wide approach to dealing with strategic social infrastructure. In order to gain a better understanding of the consequences of the London Plan proposals for growth and change, the GLA should liaise with strategic social infrastructure providers and London boroughs to ensure that a partnership approach is used to identify the need for and locations of new facilities. Linking social infrastructure and public sector investment programmes with private investment and provision also needs to take place.

London Councils strongly supports the principle that the development of housing should be matched by increased provision of public services and social infrastructure, and fully accepts the importance of this provision for delivering a high quality of life for London's residents. However we question how the Mayor will be able to deliver and ensure this principle is maintained. The GLA does not have the authority to direct London's health or education bodies, and so any increased provision in these key services can only be achieved through close collaborative relationships with the boroughs and other London's service providers. As many of London's public services are already overstretched, discussions needs to take place to identify ways of tackling areas of severe shortage, such as primary school places, and to identify sustainable funding solutions that will mean that London is equipped to meet the challenges of accommodating increasing levels of growth.

Section 106 contributions have in the past been a significant source of funding for affordable housing and social infrastructure provision. Several boroughs have already reported a reduction in the levels of developer contribution as a result of the economic downturn, although the overall impact remains unclear. In addition to this, the details of how the Community Infrastructure Levy (CIL) will operate have yet to be announced, so the effect that CIL will have on borough's abilities to negotiate Section 106 contributions are not yet known. In this environment it will be challenging for local authorities and other stakeholders to ensure improved provision of public services without financial support from other sources.

**Chapter Four – London's Economy**

**General Comments**

## **Developing London's Economy**

As stated in our response to Chapter One, London Councils believes that the review of the London Plan must be forward looking and take the opportunity to identify future economic growth sectors. There needs to be a recognition that economies go through cycles and periods of structural change, which need to be acknowledged and planned for and the Mayor must be wary of basing assumptions on previous models and predictions. The longer term implications of the international economic slowdown must be recognised through ensuring that the future approach to economic and employment growth is flexible. While the financial and business services sector will continue to be an important employer in London, it is also extremely important to ensure a diversity of employment opportunities that are accessible to people of different skills levels.

London Councils believes that there needs to be more emphasis on the continued development of a diverse economy across London. 'A New Plan for London' suggests that this will only take place through providing suitable workspaces for all types of enterprises, but it should be wider than that and give greater consideration to the range of issues that need to be addressed as part of supporting the development of a more diverse economy.

The identification of the need to give greater consideration to the spatial balance of growth and the potential for Outer London to accommodate more of London's economic growth is welcomed. In addition to strengthening local economies and providing greater access to employment opportunities for local communities, polycentric patterns of development would also release pressures on radial transport routes in to central London. However, it is important that such an approach also recognises the economic inter-relationship between central, inner and outer London so that they complement each other to provide economic growth and opportunities that benefit London as a whole. Growth in central London provides accessible opportunities for all Londoners and will continue to benefit London overall and this should continue to be supported. Outer London can perform better economically by exploiting its strengths and locational offer, and by doing so this should ensure that it is not placed in direct competition for growth with inner and central London. In addition, the revised London Plan needs to recognise that neither 'central London' nor 'outer London' are homogeneous. For example, central London includes the Central Activities Zone and areas that fall outside of this; Outer London is extremely diverse and the plan needs to be flexible enough to allow for this diversity.

## **Offices**

London Councils welcomes the recognition that different approaches to office markets need to be taken in different parts of London. However, the reference to Outer London suggests one approach for the whole of outer London and one for central London. London Councils believes that the London Plan again needs to be more sophisticated than this and recognise that office markets vary across London.

## **Arts, Culture and Entertainment**

London Councils believes that the links between the London Plan and the Mayor's emerging Cultural Strategy need to be more clearly made. The cultural sector is central to all of the six professed goals of the London Plan and has links across all areas. Culture is a hugely important factor in creating places – and is often cited as a reason why people want to live, work, study in or visit localities. It is important to ensure that a supportive

policy framework is in place to underpin London's arts, culture and entertainment sectors. A world class city requires world-class culture.

The cultural and creative industries are the third largest employer in London. Culture is also the motivation for many visitors coming to London driving tourism and the visitor economy. Particularly in a time of economic downturn, local cultural services play a key role in providing affordable local services for those who are experiencing economic hardship. Local parks, open spaces, leisure centres and arts facilities can do much to improve quality of life and wellbeing. Libraries deliver locally based learning, training and ICT opportunities.

In addition, the work of the London Living Places Partnership (LLPP) of which London Councils is a member also needs to be recognised. Living Places as a national project brings together the Departments of Culture, Media and Sport (DCMS) and Communities and Local Government with the aim of building stronger communities through culture. Within London, the LLPP brings together key stakeholders to ensure culture is embedded in the development of communities alongside other areas of key provision such as health care and transport, with a primary focus on the London Thames Gateway area. LLPP has recently produced a document on best practice case studies, 'Shaping Places in London through Culture'.

### **Supporting Retail, Town Centres and Town Centre Development**

As mentioned in the response to Chapter Two, London Councils believes that the London Plan should place greater emphasis on the need both to recognise and to support the key role that London's town centres perform and to seek to address the decline that some town centres have been suffering. It is particularly important to ensure that any proposals to develop a small number of strategic outer London development centres complement and do not conflict with plans for town centre enhancement, which should be developed in partnership with London boroughs.

The review of the London Plan must also look beyond the London boundary and consider the competition that Outer London and some Inner London town centres face from retail development outside of the Greater London boundary.

In addition, in order to support town centres it will be necessary to review the current and anticipated transport requirements which will be necessary to support their growth and attract new commercial development. Ensuring that sustainable travel options are considered and provided for will be of particular importance and should be considered as part of a wider public realm strategy for town centres.

## **Chapter Five – London's Response to Climate Change**

### **General Comments**

## **Climate Change Mitigation**

London Councils supports the emphasis on challenging CO<sub>2</sub> reduction targets, the retention of 'energy hierarchy' and the requirement for energy assessments with all planning applications. However, concerns regarding the air quality impacts of the use of biomass to meet expectations around renewables must also be addressed. This should be through either explicit cross-references to the forthcoming revision of the Mayor's Air Quality Strategy, or through explicit policy or guidance within the London Plan regarding its unsuitability in most urban situations, particularly as London is already failing to meet its statutory targets for particulate matter (PM10) pollution.

London Councils also supports the idea of exploring the feasibility of introducing a 'cooling hierarchy' to illustrate preferences for meeting the cooling needs of new developments. There is concern in some boroughs that buildings built even very recently are not adequately being designed for hotter summer temperatures, which will inevitably lead to retrofitting energy intensive air-conditioning to buildings. Getting heating and cooling to consider both emissions and to incorporate passive solar gain (and avoidance) into future building design is critical. London Councils also supports the attempt to reach the highest code levels feasible under the national Code for Sustainable Homes.

## **Climate Change Adaptation**

London Councils fully supports the comprehensive attention and importance given to considering climate change adaptation, in particular the recognition of the (UK Climate Projections) UKCP09 data due to be released and that it will be taken into account when drafting the new London Plan.

London Councils requests further details regarding how the Mayor intends to use the London Plan to "offset the contribution of development to the 'urban heat island effect'". Some more detail on how he intends to use the Plan to achieve this would be welcome. It may be intended that this will be set out in Supplementary Planning Guidance, but how this will be done in practice still needs to be outlined.

London Councils supports the intention to strengthen policies to "minimise and manage flood risk in London and its risk to development and infrastructure and provide the basis for a coordinated approach by the Mayor, boroughs and other organisations to managing strategic flood risks". London has risks from flooding that go well beyond the River Thames, so a strong approach to minimising these risks is necessary, especially as the frequency and severity are likely to increase as a result of climate change.

London Councils also supports the promotion of "sustainable drainage across London through the use of the established 'drainage hierarchy' and investigate solutions to address existing areas through the Drain London project". The recognition of retention of front gardens is important in helping with urban drainage; however a stronger emphasis on either provision of onsite drainage solutions or contributions to offsite drainage solutions needs to be made within the revised Plan.

## **Waste**

London Councils believes that one of the key issues that the review of the London Plan must address is how we move London further towards de-coupling waste growth from economic growth. Tackling waste effectively in London requires a much stronger strategic emphasis on waste minimisation. Any policies will need to be developed in collaboration

with waste authorities and London Councils would be keen to work with the Mayor on a more challenging regional approach to the 'polluter pays' principle so that producers and consumers who choose 'high waste generating products' or 'difficult to recycle plastics' are made to pay the true cost of these products.

London Councils also believes that the review of the London Plan must consider strategies to reduce disposal of waste in landfill. London has significantly reduced the volume of its waste going to landfill from 73% in 2002 to 53% in 2008 and is one of the best performing regions in the country. However, London needs to do more and to underline this, London Councils has set out its vision to move London towards a 'zero waste to landfill' goal over the next 20 years and recognise that success will depend on productive and effective collaboration between the GLA and London waste authorities. We are therefore keen to work with the Mayor through the London Plan towards this shared 'aspiration'.

London Councils is pleased to see a commitment in the consultation paper to review projections of London's waste arisings, but we would like to encourage the Mayor to go further. Many of the waste related policies in the current London Plan derive from waste data and projections. These have proved to be vastly overestimated with significant real and potential consequences for land use and targeting of investments. Projections are based on baseline data that cannot now stand up to scrutiny. Reviewing projections without looking at the base will only deal with part of the problem. In reviewing London Plan waste policies, London Councils would like to see a complete revision of both baseline data and growth projections to ensure London waste authorities have confidence in the outcome of this review.

London Councils agrees with the aspiration to manage as much of London's waste within London as practicable. However a focus on process has led to arbitrary targets being set for the region. London Councils welcomes the commitment in the consultation to review the definition of waste to be managed in London and to adopt a more flexible approach to self sufficiency with an emphasis on outcomes rather than process. Targets should be set in the Plan only where absolutely necessary. These are more suited to the relevant Mayoral strategies. Further, waste targets should reinforce national targets. If they are to change, they should reflect more closely, the characteristics of the region, past and current performance and realistic assessments of the potential for improvement. London Councils would like to see a 'pragmatic' approach to these issues. We recognise the constraints on the London Plan to set regional targets; boroughs are prepared to work with the Mayor to ensure we end up with workable, deliverable targets.

London Councils welcomes the commitment to focus on environmental outcomes for London as opposed to particular waste treatment technologies in London Plan. There is no real place for 'specification' of waste management technologies in the London Plan. If carried through, the new emphasis on outcomes should mean that agreed environmental outcomes alongside fiscal incentives (or penalties) at national level will drive investments in the desired technologies.

The proposed move towards fewer, larger waste sites needs careful consideration, particularly given the desire to manage as much of London's waste either in or as close to the areas that it is generated. Larger sites may be easier to deliver in planning terms. However, they are by nature removed from potential energy/heat loads which means environmental efficiencies may be compromised. Small scale combined heat and power (CHP) plants firing waste derived fuel would be desirable and would be a pragmatic option for London. London Councils would be keen to discuss with the Mayor how boroughs that

are required to have large waste development within their administrative areas should be compensated for this and also work with him on joint campaigns to mitigate residents' objections to the siting of these facilities in their localities.

### Response to Specific Questions

**The Mayor is committed to achieving significant reductions in energy demand and CO<sub>2</sub> emissions from new development in London; however, do you find the existing policies related to sustainable energy in the London Plan easy to understand? Are there any areas that require clarification or improvement?**

In the past there has been confusion in the development sector as well as in local authorities regarding how the hierarchy calculates the end result in terms of required renewables, as well as what constitutes 'on site' provision of renewable energy. If for example, a neighbouring site has a low carbon CHP to plug into or a supply of excess heat or electricity being generated, then it clearly makes no sense to require a specific site to also produce its own to meet the hierarchy. Whilst recognizing this is a technical subject, it would still be helpful if the hierarchy could be better explained and, more critically, the definition of 'on-site' more clearly defined.

**What do you see are the biggest challenges to the use of renewable energy in new development in London? How can the London Plan help overcome these challenges?**

Many of the bigger challenges relate to issues such as cost, infrastructure provision, feed-in tariffs etc., yet many of these are issues that go beyond the scope of the London Plan. However, the continued emphasis on issues such as renewables, micro-generation, decentralised energy and support for these through London Plan policies would help. It is also important to emphasise the need to provide guidance to developers on where things such as biomass, biofuels are/aren't appropriate, due to aforementioned air quality concerns.

**Should the London Plan outline a preference for onsite over offsite renewable energy in new development? Or should no preference be shown at all?**

No, the London Plan should attempt to define something that is reasonable, economic, and meets renewable/CO<sub>2</sub> reduction goals. As with the suggested more flexible approach proposed in this document to waste self-sufficiency for London, if for renewable energy proposals a solution is available on a neighbouring property, on the same industrial estate, same localized combined cooling, heat and power (CCHP) scheme etc., then it seems unreasonable to require something on-site for the sake of it. Another concern from such a specific on-site requirement is that developers often look to biomass as the only feasible option, which is wholly inappropriate across much of London, using even the cleanest technologies, as they are still 'dirtier' than gas, and therefore add to London's particulates, which is unacceptable when most of Greater London has now been categorised within 'Air Quality Management Areas' under local authority air quality requirements.

**In situations where new developments falls short of meeting policy requirements for the use of sustainable energy, do you support the use of financial contributions as an alternative? All contributions would be pooled and used to support other sustainable energy initiatives to benefit London.**

Yes, but boroughs must maintain control of these contributions. If the money is appropriately used, ring-fenced locally, and is well defined regarding how it can be spent, then such an approach will help to develop a more integrated and sustainable approach. The reduction of emissions is not a necessity at the local area level (in terms of carbon savings), unlike for example open space provision, so it is reasonable to have a contributions scheme that can bring medium scale renewable developments forward that might help also avoid the

problems foreseen with small scale biomass plant. Such a scheme must however have requirements that any development providing contributions must build necessary associated infrastructure to 'plug in' to such a wider scheme (such as CCHP; pyrolysis plant etc.) and also have a requirement that the development must USE a certain percentage of renewables from such a scheme (as opposed to PROVIDE that same percentage themselves).

**Do you have any suggestions for how new development could better deal with overheating given London's changing climate?**

The requirement to follow guidelines and rules on design would help. The Three Regions Climate Change Group report "Your Home in a Changing Climate" has several case studies and guidance around passive solar gain/shading, appropriate tree planting, insulation, green roofs, cool roofs, glazing, ground-sourced cooling, etc. These are the sorts of measures that need to become compulsory, as there is anecdotal evidence already that many new buildings are barely able to cope with existing weather peaks, and will need to rely on mechanical CO<sub>2</sub> emitting air conditioning, which itself emits large amounts of heat, which will only add to the 'heat island effect'.

**Some towns and cities have minimum targets for increasing urban greening, including green space, living roofs and vegetation in their central areas as a way of offsetting rising temperatures due to climate change (Manchester, for example, has identified the need for a 10 per cent increase in green space cover). Would such an approach be appropriate for central London?**

London Councils agrees that this approach would be appropriate. During the heatwave of 2003, London was up to 9<sup>o</sup>C warmer than the surrounding countryside, due to the city's inability to shed heat at night caused by the 'urban heat island'. Cool/green roofs and green spaces will be critical for London to combat hotter drier summers. These are also critical to provide respite and recreation for Londoners coming from things like an increasing population, denser housing development etc.

**What can the London Plan do to better promote the uptake of living roofs and walls in new development across London?**

The London Plan can require these in new developments except where the developer can prove it is impractical/infeasible to do otherwise (just like other planning requirements around open space, drainage, waste collection areas etc). Where it is infeasible, due to e.g., provision of wind turbines on the same roof, or through design reasons (no flat roof), then green walls or contributions to providing green roofs/walls on other buildings could be required (as is done with open space and other planning requirements).

## Chapter Six – London’s Transport

### General Comments

#### Transport and Spatial Development Integration

London Councils welcomes the reference to the importance of close co-ordination of the provision of transport infrastructure and services with land use development. However, it is also important to remember that there are parts of London where access to public transport connections remains poor. The potential of these areas should not be ignored because of poor connectivity, and it is important to identify and promote transport solutions that could address this. The Mayor should commit to addressing transport deficiencies in areas of deprivation in order that they can benefit from growth plans, acknowledging that it is not just parts of Outer London where transport deficiencies exist; parts of Central and Inner London are also affected by poor public transport connectivity.

London Councils believes that there is potential for greater use of land use policy as a travel demand management tool, and the Mayor should as far as possible aim to minimise the additional travel demand that new homes and jobs will generate. Polycentric patterns of development would offer more opportunities for much shorter trips that could be made on foot or by bicycle, and there are already opportunities to create new smaller areas for development around existing public transport hubs. Improvements to the existing public realm could help to create environments that welcome walking and cycling, and the importance of planning to support more sustainable modes of transport should be given greater weight in the revised London Plan. Priority should be given to land use policies that enable transport to play a central role in creating sustainable communities by ensuring that non-car based transport is provided from the outset in all new developments, while recognising that car use will still be necessary for some journeys.

London Councils awaits with interest the recommendations of the Outer London Commission and the proposals regarding the transport infrastructure that will be needed to support plans for Outer London. London Councils has in the past made representations to the GLA setting out concerns that the London Plan, whilst catering for the transport needs of central London, does not look sufficiently to the areas beyond. In the past, too much emphasis has been placed on providing greater capacity on radial routes serving Central London and little consideration has been given to the need to improve orbital transport routes and river crossings to exploit the growth potential of east London. These will not only improve connectivity but could potentially reduce the need for people to travel into Zone One to access their destinations. In our response to Chapter Two, London Councils has set out our aspirations for the development of an orbital transport network for Outer London which links key town centres, but there is also a need to look at necessary transport improvements beyond major town centres to district centres, hospitals, schools and industrial areas.

However, development and growth proposals need to be supported by adequate investment and linkages with the TfL Business Plan are key. The increase in housing, population and employment that the Mayor is seeking to plan for will all create significant transport challenges for a system that is already at or nearing capacity in some areas, particularly during the peak periods. The Mayor has taken the decision to remove major transport proposals from the TfL Business Plan due to lack of funding, many of which have been identified as essential to support planned growth, particularly in the Thames Gateway area. In order to ensure that transport and development are joined up, it is important to

start work on identifying the major schemes and other investment that will be necessary to support this growth and to secure the necessary funding to ensure that the improvements can actually be delivered.

The London Plan should set out longer term major transport schemes that are necessary to accommodate growth, even if these are not currently funded (such as the Chelsea-Hackney Line) and provide assurances that these schemes will be safeguarded in order that they can be delivered as soon as funding can be made available. While funding for new transport schemes is limited, the commitment to existing infrastructure improvements, in particular Crossrail is strongly welcomed.

### **Connecting London**

London Councils notes the Mayor's proposal to support strategic rail services, including inter-regional, domestic and high speed rail hubs. While recognition of the importance of strategic rail is important, London Councils believes that priority should be given to local transport services and the Mayor must ensure that services which provide for long distance commuting also meet the needs of London's residents and businesses.

### **Public Transport**

London Councils welcomes the commitment in 'A New Plan for London' to improving public transport capacity. However, more information is needed on how this commitment will actually be achieved, particularly at a time when funding is limited.

London Councils would like the London Plan to be forward looking and identify the major transport schemes that will be necessary to support London's growth, such as the Chelsea-Hackney Line, which will improve access to public transport in London in areas of the north east and south west that are currently poorly served, both within inner and outer London and east London river crossings, which have the potential to exploit the economic and housing growth potential of many largely redundant industrial areas.

'A New Plan for London' mentions that cross references will be made with the draft alteration to the London Plan and Supplementary Planning Guidance on the use of planning obligations to fund Crossrail. The proposed mechanism for funding Crossrail through a levy on development acts as a potential barrier to achieving developer contributions for other public transport improvements and funding contributions for infrastructure projects needed to address other transport deficiencies may be lost as a result.

London Councils also believes that the role of the bus network needs to be given greater significance. There remain areas of London, many of them economically disadvantaged, which are comparatively underserved by public transport and buses may offer the most cost-effective form of provision in these areas. This should be underpinned by a complete review of the bus network planning process which can identify where improvements to the current network can be made, in order to meet the needs and expectations of the twenty first century public transport user. In particular this should consider the role that the bus network can play in providing orbital linkages, including the provision of fast and semi-fast services.

### **Reducing Congestion and Making Better Use of London's Streets**

London Councils notes the proposal to investigate road user charging and would request that boroughs and London Councils are kept informed of the development of any such

work. This exercise should involve a full investigation of the social impacts of the introduction of road user charging. In addition, consideration should be given as to how to improve the existing congestion charging scheme, including the potential for using new technology to enable differential charging and other initiatives to make the existing scheme more effective.

London Councils agrees with the proposal in a New Plan for London to “allocate street space in line with priorities set out in the Mayor’s Transport Strategy”, but these priorities must be clear and unambiguous. However, we have concerns about main roads in London which are multifunctional (e.g. Brixton Road, Kennington Lane), where they are at once residential and commercial, as well as trunk roads as we would not want to see the needs of through traffic given undue priority.

London Councils remains concerned that, in both the London Plan and the Statement of Intent for the review of the Mayor’s Transport Strategy, the Mayor has elected not to define a modal hierarchy. This will be important in ensuring that the sufficient priority can be given to transport modes that have been neglected in the past, particularly walking and cycling and supporting modal shift to more sustainable forms of transport. London Councils is particularly disappointed that there is little information provided within ‘A New Plan for London’ regarding how the Mayor intends to use the London Plan to support more walking and cycling.

However, London Councils does welcome the identification of the need to substantially strengthen the policy on walking in the London Plan. London Councils has made representations to the Mayor and Transport for London that, in the past, walking has not been given sufficient priority and work needs to be done to identify and implement measures aimed specifically at improving the walking environment. Public realm improvements which create an environment that welcomes and supports more sustainable transport choices will be an important factor in achieving this and it is important that sufficient funding is made available to support boroughs in delivering these improvements. London Councils has carried out joint work with walking and cycling organisations to identify the barriers to cycling and walking in London and encourages the Mayor to take account of the recommendations of these reports when developing policies to support walking and cycling<sup>3</sup>.

London Councils notes the proposal to develop new cycle parking standards, and guidance on this issue within the London Plan will be welcomed by many boroughs. However, London Councils requests that these standards are developed in full consultation with London boroughs as many already have cycle parking standards that could be co-ordinated across London and it would make sense to build on this existing work.

## **Parking**

London Councils acknowledges the proposals to review London Plan parking policy with the intention to balance “the environmental desirability of reducing car use with the need to provide attractive viable development in town centres, while recognising that many people will continue to travel by car, particularly in outer London”. While London Councils agrees

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<sup>3</sup> ‘Breaking Down Barriers to Cycling’, A Joint Report by London Councils and the London Cycling Campaign, November 2008  
‘Breaking Down Barriers to Walking’, A Joint Report by London Councils, Living Streets and Walk London. November 2008

with the need to improve town centre accessibility, this should be by all modes of transport, not just cars and the starting point should be identifying measures to encourage less car use. The modal mix is up to the borough concerned, and a prescriptive, one-size-fits-all approach is not acceptable. In particular, the Mayor should appreciate that different approaches are going to be necessary for central, inner and outer London to reflect the different levels of provision of public transport and pressures on road space. In particular, the London Plan must acknowledge that Outer London is in direct competition with the South East regions for growth, and a review of the application of London-wide parking standards is necessary to see if changes may be needed to enable Outer London to compete more effectively with areas immediately beyond the Greater London boundary. However, any review of parking standards needs to be carried out in partnership with London boroughs to ensure that all relevant issues and concerns can be taken into account.

London Councils notes the commitment to promote electric vehicle use through securing charging points in car parks through parking standards. However, the effectiveness of this proposal is questionable as few new car parks are built and the London Plan cannot require retro-fitting of charging points to existing facilities.

## **Response to Specific Questions**

### **Is the suggested approach to airport policy reasonable?**

In principle, London Councils agrees that the suggested approach to airport policy is reasonable, although we would like to take the opportunity to raise some concerns regarding the Mayor's approach. London Councils strongly opposes any further expansion of Heathrow Airport as we believe it will have significant negative impacts, especially on air quality and noise pollution, for the capital's residents and welcomes the Mayor's commitment to resisting the provision of further capacity at Heathrow.

London Councils also accepts that there may be a need to provide further runway capacity in the South East, but opposes the use of a 'predict and provide' policy to airport development. In no other form of transport is it accepted that we should pay for and provide for all forecast growth and it is not clear why air transport should be treated differently. London Councils would like to see the adoption of a 'time phased' approach to development through a "plan, monitor and manage" approach, which, supported by continuous monitoring of the industry, would reveal what further provision was needed. This should be carried out before decisions are made regarding what level of additional airport capacity is required. In addition, London Councils would also support looking at alternative ways of managing or even reducing the demand for air travel by innovations in high speed rail links, the level of aviation fuel tax, as well as at other alternatives to expansion at Heathrow, including better use of London's other airports and the rest of the UK's regional airports.

While London Councils awaits with interest the outcomes of the work commissioned by the Mayor to consider alternatives to Heathrow, we would have reservations in supporting the development of a large new airport in the Thames Estuary at this stage as this would have significant noise and air quality implications for boroughs to the South and East of London as well as significant feasibility, logistical and infrastructure implications.

### **Given financial constraints, what else can the Mayor do to boost public transport?**

As set out above, London Councils believes that there are significant gains to be made from a comprehensive review of the bus network planning process and would encourage TfL to undertake such a review, with the full involvement of London's boroughs, at the earliest possible opportunity.

Taking into account financial pressures, the Mayor should be seeking to relieve pressure on existing public transport services through land use policies that reduce the need to travel and also encouraging the use of more sustainable modes of transport. Ensuring that boroughs receive sufficient funding to enable them to implement public realm and other local transport improvements will play an important part in achieving this objective.

In addition, there is considerable scope for small scale, low cost improvements to public transport to encourage its usage, particularly off-peak when there is still some spare capacity. This can be done by cheaper and more flexible off-peak ticketing. There is also scope for better integration between modes, especially bus-rail; enhancements to frequency, bus priority and reliability, waiting facilities and information.

Finally, even though there are financial constraints, it is important for the London Plan to set out longer term strategic transport improvements, such as proposed Tramlink extensions, DLR extensions, east London river crossings and the Chelsea-Hackney line to give some degree of certainty and allow boroughs to make provision for them in their Local Development Frameworks and the development management process.

#### **Is the approach to walking and cycling feasible/workable?**

London Councils does not believe that sufficient information has been provided in 'A New Plan for London' on the Mayor's approach to walking and cycling to enable us to take a view regarding whether it is feasible or achievable. However, the recent decision to reduce the amount of LIP funding available to boroughs and the cuts in funding for local cycling schemes will have a negative impact on the ability of boroughs to deliver the local improvements necessary to support proposals to increase cycling and walking, and this may prevent the Mayor's overall objectives from being achieved. London Councils would also draw the Mayor's attention again to the recommendations of the joint London Councils reports on breaking down barriers to walking and cycling which should be used to inform the Mayor's approach.

#### **Do you support the new approach to road schemes?**

London Councils has reservations regarding the proposal to: "Develop a new, criteria based, approach to road schemes which would allow them to go ahead if overall congestion reduces, there is local economic benefit, and conditions for pedestrians, cyclists and public transport improve". Any proposed road schemes should take into account the current saturation levels of the existing network. Economic development evidence suggests that new links are not a universal benefit; where congestion is already high, traffic can simply be redistributed along the new road space. In addition, building new roads can have unpredictable effects on labour / wealth distribution. As far as possible, new roads should be limited to those serving new developments, allowing for environmental improvements, reducing congestion bottlenecks and facilitating road safety and sustainable transport improvements, providing adequate space allocation for pedestrians and cyclists. The London Plan should also refer to the reports produced by the Standing Advisory Committee on Trunk Road Assessment (SACTRA) on new road building in developed cities.

## **Chapter Seven – London’s Quality of Life**

### **General Comments**

## **Building London's Neighbourhoods and Communities**

The commitment to siting tall buildings where they are suitable in the existing context of an area and in locations where boroughs can support them is welcomed. While tall buildings have significant potential to cause detrimental impact to the amenity and character of an area when sited in the wrong location, where the buildings are of the highest quality of design and appearance, where their inclusion has a strong urban design justification and local infrastructure is in place to support them their effect can be to enhance a place and create a distinctive, landmark feature.

## **Protecting London's Open and Natural Environment**

London Councils supports planning for allotments or areas of land where people can grow their own food – such as the project to create 2012 plots of land by the 2012 London Games to grow food which is already underway with the 'Capital Growth' project. This meets the London Plan objective of ensuring that Londoners have access to good quality and healthy food.

## **Air Quality and Noise**

London Councils supports the commitment as part of the process of the review of the London Plan to “set out the key air quality issues to be considered in assessing planning applications; reflect the new statutory requirement to reduce human exposure to air pollution; consider developing minimum standards for large emitters of pollution, such as biomass plants and large combined heat and power (CHP) plants; and refer to the best practice guidance on control of dust and emissions from construction and demolition and to new initiatives such as accreditation of emissions abatement equipment”.

Provision of minimum standards in relation to biomass plant and large CHP would be welcome. London is the most polluted city in Europe and is failing on its nitrogen oxides (NO<sub>x</sub>) and particulate matter (PM10) targets; the EU have launched infraction proceedings against the UK for failing to meet its obligations under the EU Air Quality Directive.

London Councils also believes that the proposals in the London Plan regarding air quality and noise also need to be clearly linked to the related proposals in the Transport Strategy. Improvements in air quality can be achieved not only by the development of cleaner, greener, quieter vehicles, but through supporting a shift to more sustainable modes of transport, such as walking and cycling.

## **Chapter Eight – Implementation, Monitoring and Review**

### **General Comments**

### **Collaborative Working**

London Councils welcomes the Mayor's commitment to collaborative working and the recognition of the role of London boroughs as planning authorities for the majority of developments in London. However, the Mayor needs to reinforce this through the London Plan by ensuring that the London Plan concentrates on areas where strategic guidance is needed and does not stray into areas which are better determined at a local level. The London Plan should be guided by the principle that boroughs are responsible for taking the decisions regarding developments in their areas and, excepting the occasions where there is a strategic concern, should be able to take these decisions without interference from the GLA.

In addition, there are opportunities for the Mayor to work with boroughs and other partners to identify the infrastructure needs to support the delivery of the London Plan proposals and to work to ensure that sustainable funding solutions can be identified to ensure that necessary supporting infrastructure can be delivered.

### **Priorities in Planning Obligations**

London Councils questions why the Mayor is proposing to include priorities for planning obligations in the revised London Plan. Planning obligations should reflect a borough's local priorities and mitigate the direct impacts of a development, rather than Mayoral priorities. London Councils also believes that, in cases where the Mayor takes over a planning application, Section 106 contributions should continue to be negotiated by the borough.

London Councils would also like to take the opportunity to highlight the need for proper and early engagement with London Councils and the boroughs regarding the management of the regional element of the Community Infrastructure Levy (CIL). If not properly managed and set at an appropriate level, the application of the regional CIL could severely limit the ability of boroughs to secure planning obligations for local improvements that are necessary to mitigate the impacts of a development.