The London Plan Review and the future of London

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The article is available on the publisher's website at http://www.planninginlondon.com/assets/pil93%20UPLOADS/BOWIE%20LONPLAN%20REVIEW%20PP.pdf

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The London Plan Review and the future of London

Duncan Bowie sets out the challenge to the compact city approach

The new London Plan was published by the Mayor on 10th March. The Plan sets a new housing target for London of 42,000 homes a year, up from the previous target of 32,210 homes a year. This however falls short of all the estimates of London’s housing requirements. The Mayor’s own Strategic Housing Market Assessment gave a figure of 62,000 homes a year for 10 years, the plan period, if the existing backlog was to be met within that timescale (the assumption in the previous plan). London Councils, representing the London boroughs, have put the 10 year requirement at 80,000 a year. The London Plan uses a lower figure of 49,000 a year, but this assumes that the housing need backlog would only be met over 20 years.

Much of the discussion at the London Plan Examination in Public last September revolved around the relationship of the Mayor, as strategic planning authority for the Greater London authority area, with the local planning authorities in the Greater South East, with the debate focusing on whether any of London’s housing deficit could or should be met by authorities in the wider metropolitan region. In the months leading up to the Examination in Public there had been considerable controversy over whether or not the Mayor was putting pressure on Home Counties districts to make provision within their own plans for additional housing to take the pressure off London. In this context it is not surprising that the Mayor in responding to consultation by Home Counties districts on their plans, initially in the case of Bedford and Ermbridge, requested those districts to acknowledge the projected London supply deficit. This led to a group of 51 Home Counties planning authorities, known as the Bedford 51, writing a joint letter to the Mayor to argue that London should meet its housing requirements within the existing GLA boundary. At the EiP, the group argued that the Mayor should increase the London Plan target to at least 49,000 homes a year—some suggested that the target should be increased to 62,000. It was put forward that the Mayor should identify development sites within the Green Belt within the London boundary.

Much of the debate at the EiP centred on whether or not the London Plan target should be increased. The Mayor’s team brought forward new evidence that a further 7,000 homes a year could be delivered through intensification of suburban town centres, using capacity released by underused retail premises in suburban high streets. The GLA planners considered such locations as suitable for flats for elderly persons, students and young professionals. The deputy Mayor, Sir Eddie Lister, sought in his opening speech to reassure the Home Counties districts that that 49,000 was deliverable and that they did not need to be concerned about overspill from London.

The EiP inspector commented that “the impact of increasing densities on townscapes, existing communities and on social and physical infrastructure also needs to be considered” and that “it cannot be assumed, in my view, that it will be appropriate to increase densities over the existing Density Matrix guidelines in all cases.” The inspector went on to say that “I am concerned that the strategy of accommodating the development necessary for London’s growth within its existing built confines will place unacceptable pressures on the city’s communities and environment.... In my view, the Mayor needs to explore options beyond the existing philosophy of the London Plan. That may, in the absence of a wider regional strategy to assess the options for growth and to plan and coordinate that growth, include engaging local planning authorities beyond the GLA’s boundaries in discussions regarding the evolution of our capital city.”

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The Mayor has already initiated the process for reviewing longer term development options, including options for meeting London’s housing deficit through planned development beyond the London boundary. The form this has taken is a draft infrastructure plan to 2050. This was in fact published by the Mayor in August 2014 before the EiP commenced. The Plan was supported by a number of research documents including a costing report by Arup and a transport paper by Transport for London, together with population and employment projections, a paper on improving infrastructure delivery, a report on broadband connectivity and a report on green, energy, water and waste infrastructure.

Both the main report and the transport paper examine alternative options for meeting the challenges of London’s population growth. The main report includes a section on ‘Spatial patterns of growth’, which focuses on the case for the intensification of suburban town centres and for increasing densities in areas with good transport links, commenting that ‘the impact on London’s overall major infrastructure requirements of further densification would be minimal’, which rather discounts the requirements of an increased population for social infrastructure such as schools, health and leisure facilities. The report suggests the redevelopment of 10 per cent of existing suburban housing at double the existing low density could provide some 400,000 more homes while keeping density within existing planning policy ranges. There is no proposal for how this could be achieved — compulsory acquisition of suburban homes for clearance and redevelopment would be expensive as well as highly controversial.

The report then considers the role of the Greater South East beyond the GLA administrative boundary, focusing on the potential for ‘increased densities in urban areas in the South East where current residential densities are low, even near public transport or established town centres’, before stating that the GLA have also considered ‘the role that new towns and urban extensions can play in areas beyond the Green Belt, particularly in areas where there is scope to increase rail commuting.’

It is suggested that with densities of 100 dwellings per hectare, homes for around one million people could be provided, with better rail connections increasing the potential for longer distance commuting.

The transport supporting paper takes the spatial analysis of development options a stage further by mapping the locations in the Rest of the South East (ROSE) for potential new homes based on the assumption of developing at 100 dwellings per hectare in existing urban areas with low density and good commuting access to London. In order to concentrate economic and regeneration benefits on areas with relatively high levels of deprivation, only areas within the 25 per cent most deprived areas in ROSE were considered the Rest of the South East. But this is perhaps not the best approach to ensuring the most sustainable development, in economic, social or environmental terms.

There needs to be a mechanism for assigning the future needs of the projected population of the Greater South East as a whole, and as the TCPA suggested at the EiP, a mechanism for a consistent Strategic Housing Market assessment and assessment of development capacity through a Strategic Housing Land Availability Assessment across the metropolitan region as a whole. While the focus has been largely on meeting London’s projected housing deficit, the population of ROSE is also growing and the requirements of this population growth cannot be disregarded. Moreover, the issues of employment generation, transport connectivity, waste, energy, power and water supply, sewerage and green infrastructure are all matters that need to be considered at a metropolitan regional level.

The current mechanisms for strategic planning at a metropolitan level are grossly inadequate. The Mayor is seeking to formalise his pre-existing informal liaison arrangements, but these will not be adequate to resolve a range of issues where there is no agreement between the Mayor and the ROSE local planning authorities. It is for national government not just to take a view on appropriate development options but to establish governance arrangements to ensure that the challenges of the growth of our capital city are met in a way which is sustainable in the long term in environmental, economic and social terms. We need a statutory strategic planning system for the London metropolitan region and the sooner we have the debate about the most appropriate strategic planning and governance arrangements the better. The Minister, Brandon Lewis, in approving the revised London Plan for publication, stated that he did think that a formal arrangement for planning the London metropolitan region was necessary. He is wrong. This is a matter of urgency and cannot be delayed in favour of continued adhocery and political opportunism.

Future generations deserve better than that.

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1. The Bedford 51 EiP submission [https://www.london.gov.uk/sites/default/files/151_HertfordshireCCon_behalf_o f_Bedford51_Session2.pdf]
4. Inspector’s report. Paras 54 and 57.