

January 2008



**Friends of  
the Earth**

# Briefing

# The Mayor's London Plan

The London Plan is the Mayor's masterplan for the capital. It covers every aspect of London life from the way land and natural resources are used as well as transport, housing and other key issues for London's future and quality of life. As such the London Plan is probably the most important of all of the Mayor's strategies.

This briefing highlights key points from the independent inspectors' hearings into revisions to the Plan held during 2007.

The Mayor held a public consultation in autumn 2006 on the changes he wanted to see in the London Plan known as the Further Alterations to the London Plan (FALP). A public hearing known as an Examination in Public (EIP) was held in summer 2007 with an independent panel of inspectors selecting key topics for consideration.

The panel reported in October 2007 and recommended some changes to the Mayor's proposed revisions to the Plan, which the Mayor must take into account. After final approval from the Government, we expect the revised London Plan to be published in early 2008.

This briefing is available on our web site [www.foe.co.uk/england/london/](http://www.foe.co.uk/england/london/). For more information contact Jenny Bates, Friends of the Earth London's Campaigns Co-ordinator.

---

**Friends of the Earth inspires solutions to environmental problems, which make life better for people.**

**Friends of the Earth is:**

- the UK's most influential national environmental campaigning organisation**
- the most extensive environmental network in the world, with almost one million supporters across five continents and over 60 national organisations worldwide**
- a unique network of campaigning local groups, working in over 200 communities throughout England, Wales and Northern Ireland**
- dependent on individuals for over 90 per cent of its income.**

**To join or make a donation call us on 0800 581 051**

**Friends of the Earth, 26-28 Underwood Street, London N1 7JQ**

**Tel: 020 7490 1555 Fax: 020 7490 0881 Email: [info@foe.co.uk](mailto:info@foe.co.uk) Website: [www.foe.co.uk](http://www.foe.co.uk)**

Friends of the Earth Limited company number 1012357

♻️ Printed on paper made from 100 per cent post-consumer waste

## The Mayor's London Plan

### Highlights from the Panel Report

The Mayor highlighted climate change as the key priority for what were very focused and limited revisions to the London Plan, the FALP. We criticised the scope of the FALP but welcomed the emphasis on climate change. Below are key points from the Panel Report.

Other areas of particular interest are on reducing the need to travel and on aviation, on waste and changes to London's sub regions. We also highlight some issues raised in the Panel Report on the scope of this review of the London Plan and implications for future alterations.

We give further information with links to relevant pages on the Mayor's website, including to our statements of evidence. Key passages from the Panel Report are in **bold type**.

### 1. Climate Change

#### a. Carbon Dioxide (CO<sub>2</sub>) reduction targets

The targets for CO<sub>2</sub> reduction set out in the existing London Plan referred to those in the Mayor's Energy Strategy. These were for 20% cuts from 1990 levels by 2010, 60% from 2000 levels by 2050 and aiming to achieve 23% from 1990 levels by 2016.

In a new policy (4A.2ii on page 198) the Mayor proposed minimum targets to cut London's CO<sub>2</sub> emissions:

- 15% by 2010
- 20% by 2015
- 25% by 2020
- 30% by 2025

The Mayor said these would work towards a long-term goal of 60% cuts by 2050. Notably, the 2010 target is lower than both the current London Plan and Energy Strategy. The Mayor said that this reflects the Government's own reduced expectations of what can be achieved, and the expected growth of population and businesses in London.

Our submission to the consultation called for these targets to be strengthened in line with the cuts identified as being needed by the research by the world renowned Tyndall Centre in *The Future Starts Here: The Route to a Low Carbon Economy*  
[http://www.foe.co.uk/resource/reports/low\\_carbon\\_economy.pdf](http://www.foe.co.uk/resource/reports/low_carbon_economy.pdf).

We said this because urgent action is needed to avoid the world warming by the 2 degrees centigrade that is considered essential to avoid the worst impacts of climate change. We also called for annual cuts to be included in line with annual cuts of at least 3% being called for nationally.

In his Climate Change Action Plan launched in February 2007 the Mayor included targets of 60% cuts by 2025, which meant annual cuts of 4%. We welcomed this Action Plan, and our evidence to the EIP called again for the targets in it to be strengthened.

<http://www.london.gov.uk/mayor/environment/climate-change/ccap/index.jsp>

The Panel Report made some general points:

“At various points **the Mayor indicated that he was seeking to take a lead, nationally and indeed internationally.** It was the intention of the FALP to change behavior.” (from paragraph 1.7) “We accept in general the need for stretching targets as a means of encouraging new ways of thinking and promoting change...” (from paragraph 1.13)

However the Panel stated that:

“1.52 Policy 4A.2ii of the FALP sets out targets for carbon dioxide emission reductions – 15% by 2010, 20% by 2015, 25% by 2020 and 30% by 2025. A different set of targets had been set out in the Mayor’s CCAP, which post-dated the FALP, and a number of parties in their statements suggested that this was confusing. However the Mayor clearly indicated that it was not his intention to seek to alter the FALP figures at this stage. The CCAP had not been through a suitable consultation process, the achievement of the targets in it required National policy changes, and he would seek to feed revised figures into a future review. We were content to base the discussion at the EiP on the FALP figures, though it was suggested (and we agree) that a reference to the CCAP and its status might usefully be added to the Plan. The Mayor put forward additions to Chapter 6 (in BN16D point 14) with which we agree.

1.53 A number of Participants (RSPB, the Assembly, LSx, FoE (*Friends of the Earth*) in different ways, expressed the view that **the targets were not sufficiently ambitious.** A good deal of evidence was put to us to suggest that the situation was serious, that much faster progress needed to be made (by the Government and the Mayor) and that the dangers posed by Climate Change were severe. We do not repeat this here; the first paragraph on page 2 of the Environment Agency (EA) evidence, for example, summarises it very succinctly. But we do not underestimate the point; we accept the desirability of higher targets and more rapid progress than heretofore. The question, however, is whether the adoption of higher targets would assist. As one participant said, it is pointless having pointless targets.”

**The Panel concluded that:**

“Recommendation 1.9

We recommend that the targets set out in Policy 4A.2ii should be retained. We recommend that a reference to the Mayor’s Climate Change Action Plan, and its relationship to the London Plan, should be incorporated into Chapter 6 as proposed in BN16D ...”

**b. Renewable energy from on-site renewables in developments**

**Our view:** We supported the Mayor’s FALP proposal that he would, and the Boroughs should, require developments to achieve a reduction in CO<sub>2</sub> emissions of 20% (which is a strengthened target) from onsite renewable energy generation, as set out in Policy 4A.7 Renewable Energy.

The Panel Report stated:

“...we feel that it is by the setting of stretching targets that progress will be achieved. We come later to the detail of some of the targets and technologies but as an example it does appear to the Panel on the evidence that the setting of targets for on-site generation is leading to improved performance in this area.”

## The Mayor's London Plan

“...we feel that **there are potential benefits for London in embracing change, and we note that its competitors are doing so too; ‘green’ credentials are likely to be an increasing factor in the choice of location for international companies, and add credibility to London’s burgeoning role as a dominant centre for carbon emissions trading.**”

“...costs are reducing and likely to reduce further as measures are adopted on a larger scale. The Mayor argued that **mitigation measures must now be regarded as an essential component of development rather than an added cost**, and we agree that this mind-set will increasingly be necessary.” (All from paragraph 1.29)

“...doubts were cast on the potential efficacy of most kinds of renewable energy generation in London. It was argued for example that certain types of high density development do not lend themselves to particular forms of technology, that micro-climatic issues affect the efficiency of certain measures, and so on. We do not intend to report on all this detail but we have noted it. As an exercise in finding reasons for taking no action this was an effective line of argument, but in a situation where we have accepted the need for change as advocated in the FALP **we felt unable to accept this counsel of despair. It reflects an approach that attempts to add renewable energy measures to developments after their form has been decided rather than as an essential component of the initial design.**” (From paragraph 1.31)

**The Panel concluded that the 20% target should be supported, but with a qualification:**

“Recommendation 1.11

We recommend that the opening part of Policy 4A.7 should read as follows:

“The Mayor will and the Boroughs should in their DPDs adopt a presumption that developments will achieve a reduction in carbon dioxide emissions of 20% from on-site renewable generation unless it can be demonstrated that such provision is not feasible.” ...”  
(DPDs = Development Plan Documents)

## 2. Transport - Reducing the need to travel and aviation

Although about 70% of the capital’s CO2 comes from buildings (domestic, commercial and public), transport is also an important sector, with road transport responsible for about 20% of emissions. Further, aviation is the fastest growing source of CO2 emissions in the UK, and if left unchecked the emissions from air travel growth would mean that all other sectors would have to have zero emissions.

The main transport sections of the London Plan were not subject to revision in the FALP, and the issue of reducing the need to travel was considered under the climate change topic. A transport section dealt with aviation (see below) and freight only.

### a. Reducing the need to travel

The FALP included a proposed change from the London Plan’s current objective to “Minimise the need to travel and the growth of journey lengths” to “Reduce the need to travel by car and the growth of journey lengths.”

**Our view:** We did not support this change, saying that **rather than revise the objective,**

**the revised London Plan must show how it will actually reduce the need to travel, not just by car**, and cited walking and cycling as the most sustainable forms of travel.

The Panel Report stated:

“1.90 The fifth bullet point of Objective 5 in the 2004 Plan reads: “Minimise the need to travel and the growth of journey lengths”. The Mayor proposed in the FALP to change this to “*Reduce* the need to travel *by car* and the growth of journey lengths”. This raised a good deal of comment and objection in representations and we decided for convenience to deal with it while we were discussing Climate Change.

1.91 The Mayor’s argument in favour of this change was summarised in his statement. In the particular circumstances of London the key “...is to shift the mode rather than the length of journey – away from cars towards public transport”. To remain competitive London needed to draw on an extensive labour market – but they had achieved an unprecedented shift of 4% from cars to public transport. The proposed change to the objective reflected this.”

**The Panel concluded:**

“Recommendation 1.13

We recommend that the fifth bullet point of Objective 5 is worded:

**“Reduce the need to travel, especially by car, and the growth of journey lengths”**. We recommend that the Mayor considers the need for any consequential changes elsewhere in the Plan.”

**b. Aviation**

Decisions on aviation policy and airport expansion are made by the Government, but the FALP set out the Mayor’s views on airport expansion in London and the wider South East (Policy 3C.6). The Mayor opposed further runway capacity at Heathrow - on the basis that it does not seem possible for there to be the adequate mitigation of the adverse air quality and noise impacts that he would require to support it.

In the FALP stated that the Mayor supported the runway expansion outside London that the Government proposes at Stansted (and potentially later Gatwick), with provisos, to meet London’s economic needs. However the Mayor stated at his press conference on 31 October 2006, after the FALP had been published, that he was currently reviewing his position on runway expansion in the wider South East, and he subsequently suggested the removal of the relevant reference from FALP.

**Our view:** We supported the Mayor’s stance against further runway capacity in London and the wider South East because the environmental, economic and social case has not been made. Expansion cannot take place without significant environmental damage, and growth in aviation would continue to significantly favour the better off. In London only a third of passenger traffic is important to London’s economy, according to original research by the London Sustainable Development Commission: [http://www.london.gov.uk/mayor/sustainable-development/docs/lcdc\\_airtransportimpacts.pdf](http://www.london.gov.uk/mayor/sustainable-development/docs/lcdc_airtransportimpacts.pdf)

The Panel Report stated:

“Consistency of the FALP with Government Policy

### 7.13 Against this background we look first at Policy 3C.6.

#### Policy 3C.6 Airport development and operation

The Mayor supports the development of a sustainable and balanced London area airport system, and recognises that further runway capacity in the South East will be required to meet London's needs. The strategic framework for the development of air travel in the UK over the next 30 years was published by government in 2003. Adequate airport capacity serving a wide range of destinations is critical to the competitive position of London in the global economy. The Mayor recognises that airport capacity must be sufficient to sustain London's competitive position, although providing a level of capacity sufficient to meet unconstrained demand is untenable. The Mayor believes that the aviation industry should meet its full environmental and external costs but accepts there will still be a need for extra capacity to meet London's economic needs.

The Mayor strongly supports the Aviation White Paper's conclusion that, based on current evidence, any proposal for additional runway capacity at Heathrow should not be progressed unless the adverse impacts on air quality and noise can be sufficiently mitigated, and public transport access improved. On current evidence, adequate mitigation of these issues and of climate change impacts is not possible, and additional runway capacity at Heathrow is therefore opposed."

On Heathrow airport the Panel stated:

"7.18 ...Further development at Heathrow is supported in principle, contingent on stringent environmental limits being met. The Project to assess whether or how those limits might be achieved has yet to report. Until it does, the conclusion to the end of the second paragraph to Policy 3C.6 is premature and directly contrary to Government policy.

7.19 As an elected politician, democratically accountable to one of the world's major cities, the Mayor must of course be able to hold and express views independent of Government. However, the Spatial Development Strategy for London – the London Plan – is a statutory document with legal authority. Within its confines is a statutorily determined constraint in Section 41 of the GLA Act to ensure consistency with Government policy. We do not see GOL Circular 1/2000 paragraph 2.9 as creating sufficient leeway for a fundamental inconsistency with a policy specific to Heathrow, but rather as foreseeing potential variations from nationally applicable topic based policies, say on retailing, that might be justified by the particular uniqueness of London. We reach an unequivocal conclusion that the final sentence of the second paragraph of Policy 3C.6 needs to be deleted."

#### The Panel concluded:

##### Recommendation 7.1

We recommend that Policy 3C.6 be changed by the **deletion of the words "On current evidence, adequate mitigation of these issues and of climate change impacts is not possible, and additional runway capacity at Heathrow is therefore opposed."**

On other airports in the wider south east of England the Panel stated:

"7.23 In his written statement in advance of the EiP session the Mayor said that he wished to modify this paragraph by deleting the sentence beginning "The proposed expansion of Stansted (and potentially later at Gatwick) ...."

7.24 This was supported by some and opposed by others. We have no doubt that the Mayor was right to seek the modification, and we would in any event have recommended it. In itself the sentence is not inconsistent with the White Paper and Progress Report, but **we think it wrong for the London Plan to express different degrees of opposition or support for airport expansion within and outside the London boundary.** As published, the FALP opposed expansion at Heathrow, subject to future review, while conditionally supporting it at Stansted and potentially at Gatwick. **Subject to our recommendation above, the London Plan would, at least for now, drop express opposition to expansion at Heathrow and we consider that it should similarly drop even conditional express support for expansion at the other two airports.”**

The Panel concluded:

“Recommendation 7.3

We recommend that paragraph 3.175 be modified by **deleting the sentence: “The proposed expansion at Stansted (and potentially later at Gatwick) is therefore supported, provided that the environmental effects are satisfactorily mitigated and that sufficient additional transport capacity, particularly by public transport is provided.”**”

### **3. Waste**

The FALP set out revised targets to exceed recycling or composting levels in municipal waste of 35% by 2010 and 45% by 2025. These however had not been highlighted in the consultation document as being issues where changes were being proposed. We pointed this out and also recommended even stronger targets for recycling and composting. The Panel Report confirmed the targets as set out in the FALP, with conditions in Recommendation 8.6.

### **4. London's Sub Regions**

The FALP proposed a change in how London would be divided up into sub regions. It proposed 5 sub regions comprising the boroughs as set out below. These were confirmed by the Panel subject to various conditions.

**North London:** Barnet, Camden Enfield, Hackney, Haringey, Islington and Westminster.

**North East London:** The City, Tower Hamlets, Newham, Waltham Forest, Redbridge, Havering and Barking & Dagenham.

**South East London:** Southwark, Lewisham, Greenwich, Bexley and Bromley.

**South West London:** Croydon, Lambeth, Merton, Sutton, Kingston, Richmond and Wandsworth.

**West London:** Hammersmith & Fulham, Brent, Ealing, Harrow, Hillingdon, Hounslow and Kensington & Chelsea.

## Scope of the review and future revisions

The Panel Report made observations about the limitations of the scope of the revisions in the FALP and made recommendations about future review of the London Plan.

The Panel Report stated:

### *“Review*

0.26 The Mayor indicated his intention to produce a further set of Alterations soon (he was not specific about the date). This was, in particular, to deal with the need to roll forward the housing figures, which he is committed to completing by 2011 (and we discuss this in Chapter 6). But it was clear that **there were aspects of the Climate Change policies which would need to be altered** (we mention a number of them in Chapter 1). There are no doubt other issues where change will be necessary.

0.27 We welcome this, and are confident given the Mayor's track record of making two sets of Alterations since 2004 that such a process will be forthcoming.

0.28 This issue did however lead to some debate at the EiP, with **several parties arguing that a complete review of the Plan as a whole would be necessary**. We agree that as more sets of Alterations are produced the coherence of the Plan as a whole will be threatened. **We think that a single focussed set of Alterations in about 2009, dealing with the housing figures and a limited number of other matters, would be acceptable**. But we do not think it possible for the Mayor to produce more than one such set of partial Alterations before it will be essential for him to produce a complete review of the Plan, giving an opportunity for the underlying principles to be debated. There are arguments for proceeding to this stage straight away, and we urge the Mayor to consider it, but it can be argued that the need to roll forward the housing figures from 2016, without the delay that a complete review might entail, would make that problematic.”

Appendix F states:

“F. 1 Issues raised by the Panel Chair (5/7/07)

### Scope of Reviews and Alterations

The purpose of this question is not to debate or criticise the FALP but to see whether there are lessons which can be learned not just for London but for other Regions when Alterations or Partial Reviews will be taking place. The Panel, and some of the parties, have had some difficulty in defining the scope of the EiP. We think we have done this successfully and are content with the process. But, the difficulties are these.

First, the FALP contain some major changes (ie the Climate Change or the Sub regions) but also a whole range of other changes throughout the Plan. Most of these are minor but some are significant and we have felt the need to include them in the EiP - leading at times to a somewhat fragmented debate. As an example, the Transport and Housing chapters have not been substantially changed but there are issues we needed to pick up; similarly the changes to

## **The Mayor's London Plan**

the BRN – though the Mayor saw them as minor – were controversial and led to substantial debate.

Second, parties have found it hard to confine themselves to the Alterations. This is understandable because in some cases the FALP could be seen to have implications for parts of the Plan which remain unchanged and which are beyond our remit. Some quite profound points have been made by participants which the Panel will be unable to advise upon because they are beyond the scope of the EIP.”

### **Further Information:**

The Mayor's index page on the London Plan: <http://www.london.gov.uk/mayor/planning/strategy.jsp>

The EIP website is: <http://www.london.gov.uk/london-plan-eip/index.jsp>

Friends of the Earth submitted statements to the EIP on the following matters, on which we also gave oral evidence (except on Housing) - our participant number is 187:

Matter 1.1 - Climate Change – Mitigation

Matter 1.2 - Climate Change – Adaptation and Related Issues

Matter 5.1 - Town Centres/CAZ and Matter 5.2 – Opportunity Areas/Areas for Intensification/Areas for Regeneration (accessed through submissions on “multiple matters”)

Matter 5.4 - The Suburbs

Matter 6 - Housing

Matter 7 - Transport

Matter 8 - Waste Management

The statements are here: <http://www.london.gov.uk/london-plan-eip/2007statements/index.jsp>

The Panel report is here: <http://www.london.gov.uk/mayor/strategies/sds/eip-report07/index.jsp>

Friends of the Earth's response to the public consultation on the FALP in 2006, on a wider range of issues than those Matters selected for the EIP, is available from Jenny Bates, Friends of the Earth London Campaigns Co-ordinator at [www.foe.co.uk/england/london](http://www.foe.co.uk/england/london) .