

November 2006



**Friends of  
the Earth**

# Briefing

# The Mayor's London Plan

The Mayor is revising the London Plan – the blueprint for London's future. Public consultation on the proposed changes runs until 22 December. As the Mayor's overarching strategic plan for Greater London the London plan is probably the most important of all Mayoral strategies as it brings together economic development, social and environment issues, and plans how London will look over the next 15-20 years.

We expect the Mayor to make further announcements during the public consultation phase mainly because issues around climate change are moving very fast at the moment - the science, publication of reports and the politics

This briefing and our web site [www.foe.co.uk/london](http://www.foe.co.uk/london) are intended to help you understand the main changes and respond to the consultation. For more help and information contact Jenny Bates, Friends of the Earth London's Campaigns Co-ordinator, [jennyb@foe.co.uk](mailto:jennyb@foe.co.uk), 020 7566 1633 (direct) or 07884 003107 (mobile).

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## YOUR CHANCE TO COMMENT

The current London Plan, the first since London gained its own regional government, was adopted in February 2004. This first version is being revised and the Mayor's draft "Further Alterations" are out for public consultation until 22 December 2006.

A public hearing known as an Examination in Public (EIP) will then be held during 2007 to consider the draft revisions. This is expected to start in June 2007. What is decided in the next few months and into 2007 will affect development in London from 2008 to 2025/6.

## WHY THE LONDON PLAN IS IMPORTANT

Whatever is in the London Plan will influence most aspects of life in London. For instance it will affect where you live and work, such as the amount and type of built development. The London Plan has divided the boroughs into 5 sub-regions (see page 8). The draft revisions to set out key issues and policies for each sub-region affecting each borough.

Local councils' planning decisions have to comply with the London Plan. Once this round of revisions has been finalised councils will update their Local Development Frameworks (LDF) to conform with the new London Plan. So the work of community groups and individuals on local development proposals is affected by the London Plan.

## FRIENDS OF THE EARTH LONDON'S VIEWS

The Mayor has highlighted climate change as a key priority for the London Plan revisions, which we welcome. Following analysis of the draft Further Alterations to the London Plan, we highlight the following key points focused on the overall sustainability framework for London and the all important issue of climate change and related transport issues.

### 1. The Mayor's Vision and sustainable development

The draft Plan cites the Mayor's vision as "to develop London as an exemplary, sustainable world city, based on the three balanced and interwoven themes of strong, long-term and diverse economic growth, social inclusivity and fundamental improvements in the environment and use of resources".

The emphasis on economic growth, as opposed to economic progress, is at odds with the Government's Sustainable Development Strategy (SDS):

<http://www.sustainable-development.gov.uk/publications/uk-strategy/index.htm>

The SDS lists 5 Guiding principles which include "Living Within Environmental Limits" and "Ensuring a Strong, Healthy and Just Society" (Page 16, Chapter 1). It says "We want to achieve our goals of living within environmental limits and a just society, and we will do it by means of a **sustainable economy** good governance, and sound science."

The principle on the economy states "Achieving a Sustainable Economy. Building a strong, stable and sustainable economy which provides prosperity and opportunities for all, and in which environmental and social costs fall on those who impose them (polluter pays), and efficient resource use is incentivised."

The London Plan is the key strategy to embed sustainable development into the way London functions and is developed. The Government's Planning Policy Statement 1 (PPS1) states that "Sustainable Development is the core principle underpinning planning" (page 2, objectives for the planning system, No 3).

PPS1 empowers the contents of the SDS: "The following key principles should be applied to ensure that development plans and decisions taken on planning applications contribute to the delivery of sustainable development: (i) Development plans should ensure that sustainable development is pursued in an integrated manner, in line with the principles for sustainable development set out in the UK Strategy. Regional planning bodies and local planning authorities should ensure that development plans promote outcomes in which environmental, economic and social objectives are achieved together over time."(PPS1, para 13 header and key principle (i)) <http://www.communities.gov.uk/index.asp?id=1143805>

**Recommendation:** The pursuit of economic growth per se should be dropped in favour of economic progress such that we live within environmental limits and build a just society.

## 2. Growth of jobs and population

The draft Plan, refers to "...the projected rapid growth of people and jobs, driven by powerful market and demographic forces" and states "The London Plan cannot realistically reverse these strong, deep-rooted factors driving change, nor does the Mayor wish it to do so. This plan sets out policies to accommodate that growth in a sustainable way, within London's own boundaries and without encroaching on London's own precious green spaces." (page xxvii, paragraph xi)

However, the plan goes on to effectively say that we must facilitate this growth: "this level of growth will be inhibited unless a range of supply side issues is dealt with to match the demand. These include the supply of commercial floorspace, housing, relevant skills, adequate transport and a high quality environment." (paragraph xv)

Current strategies to spread the benefits of London's economic wealth appear not to be working. According to the Mayor's London Development Agency "The employment rates of most disadvantaged groups do not appear to have improved relative to London's overall employment rate over the economic cycle to date" and "The employment rate in disadvantaged areas does not appear to have improved relative to the employment rate for London as a whole".

London Economic Development Snapshot issue 3, July 2006 (Objective 5 and 6 )  
[http://www.lda.gov.uk/upload/pdf/London\\_Economic\\_Development\\_Snapshot\\_July\\_2006.pdf](http://www.lda.gov.uk/upload/pdf/London_Economic_Development_Snapshot_July_2006.pdf)

**Recommendation:** The revised London Plan must show that its policies will actually address and reverse these unacceptable trends.

The current plans that see a further concentration in business and financial services jobs in London, particularly located in central London and areas of East London and Docklands, are unlikely help London develop sustainably. We want to see the London Plan pursue a more diverse and more evenly spread economy for London. This should particularly benefit the disadvantaged groups and areas, and achieve a better balance between the suburbs and outer London town centres compared to inner London - where employment growth is due to be considerably higher than outer London.

High wages and city bonuses are likely to lead to higher costs of living for all Londoners and impact on housing affordability as well as availability. To help those Londoners most in need of housing, direct investment in social housing is considered a better approach than increasing overall supply. Current plans for London are also likely to increase longer distance commuting.

Crucially, the Plan cites the “scale of London’s future population and business growth” as one reason why the Mayor has set new carbon emission reduction targets which are below those in the Mayor’s existing Energy Strategy, explaining that this growth “will generate more demand”.

**Recommendation:** The revised London Plan must show how London will develop and grow sustainably - delivering a just society and respecting environmental limits – including setting and meeting adequate reduction targets for carbon dioxide, the main climate change gas.

### 3. Climate Change targets

We welcome the recognition by the Mayor that climate change is of fundamental importance, and his stated commitment for London to lead the way in achieving very substantial reductions in emissions of the main climate change gas, carbon dioxide (CO<sub>2</sub>).

In a new policy (4A.2ii on page 198) the Mayor proposes 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 says 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 says that this reflects the Government’s own reduced expectations of what can be achieved, and the expected growth of population and businesses in London.

**Recommendation:** Instead of this weak position, we want to see targets set for annual cuts in CO<sub>2</sub> emissions for London, as we are calling for at least 3% annual cuts nationally to be included in the Climate Change Bill that the Government has recently announced - see [www.thebigask.com](http://www.thebigask.com) .

This would help London and the UK play its part in averting the worst climate change effects. Recent research by the UK’s leading climate researchers at the Tyndall Centre shows that cuts of 70% by 2030, and 90% by 2050 are needed to avoid the world warming by the 2 degrees centigrade that is considered essential to avoid the worst impacts of climate change.

*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)

In short, the current draft revisions of the London Plan are not proposing to take the action needed on climate change to ensure London can prosper without worsening climate change.

Tougher targets to cut emissions are needed based on the best scientific advice.

The Stern Review on the economics of climate change came out on 30<sup>th</sup> October. This showed that the cost of taking action on climate change was much less than the cost of not taking action. Following the publication of the Stern Review, the Mayor has said that “clearly arising from the Stern report we will be re-evaluating all City Hall policies to look at how more radically and dramatically we can advance the carbon emissions reduction targets”. He has also said he is “developing a climate change action plan which will set targets and sector by sector measures aimed at cutting the capital’s emissions every year”, which we look forward to.

Stern Review: *The Economics of Climate Change*

[http://www.hm-treasury.gov.uk/independent\\_reviews/stern\\_review\\_economics\\_climate\\_change/stern\\_review\\_report.cfm](http://www.hm-treasury.gov.uk/independent_reviews/stern_review_economics_climate_change/stern_review_report.cfm)

David Miliband statement on the Stern Review

<http://www.defra.gov.uk/corporate/ministers/statements/dm061030.htm>

## Mayor's statement on climate change

<http://www.london.gov.uk/webcasts.jsp>

Media release as Mayor signs up to Friends of the Earth Big Ask climate campaign

[http://www.foe.co.uk/resource/press\\_releases/mayor\\_joins\\_friends\\_of\\_the\\_31102006.html](http://www.foe.co.uk/resource/press_releases/mayor_joins_friends_of_the_31102006.html)

**Recommendation:** We welcome the step the Mayor has taken with his proposal that he will, and the Boroughs should, require developments to achieve a reduction in CO<sub>2</sub> emissions of 20% from onsite renewable energy generation, as set out in Policy 4A.7 Renewable Energy, on page 204.

## 4. Transport

Although about 70% of the capital's CO<sub>2</sub> 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 CO<sub>2</sub> 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.

### a. Aviation

Decisions on airport expansion are made by the Government, but the draft revisions for the London Plan set out the Mayor's current views on airport expansion in London and the wider South East (Policy 3C.6 Airport development and operation, on page 131).

The Mayor opposes 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 current draft Plan, the Mayor supports the runway expansion outside London that the Government proposes at Stansted (and potentially later Gatwick) - to meet London's economic needs. However the Mayor stated at his press conference on 31 October 2006

that he is currently reviewing his position on runway expansion in the wider South East.

We do not support 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 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)

**Recommendation:** We welcome a revised position from the Mayor not to support runway expansion at Stansted or Gatwick.

## **b. Reducing the need to Travel and Accessibility**

To improve transport accessibility in London the draft Plan includes a proposal to "Reduce the need to travel by car and the growth of journey lengths." The current London Plan states "Minimise the need to travel and the growth of journey lengths." (page xxiii)

**Recommendation:** The revised London Plan must show how it will actually reduce the need to travel, not just by car. Walking and cycling are the most sustainable forms of travel.

In 2003 the Social Exclusion Unit (SEU) reported that accessibility means people can "get to key services at reasonable cost, in reasonable time and with reasonable ease" and that "Accessibility depends on several things: does transport exist between the people and the service? Do people know about the transport, trust its reliability and feel safe using it? Are people physically and financially able to access transport? Are the services and activities within a reasonable distance?"

The SEU adds: "Solving accessibility problems may be about transport but also about locating and delivering key activities in ways that help people reach them." For access to work the SEU report states "Two out of five jobseekers say lack of transport is a barrier to getting a job." *Making the Connections: Final Report on Transport and Social Exclusion*

**Recommendation:** Based on the SEU report 3 out of 5 jobseekers' lack of transport is not the issue. Therefore improvement in accessibility that is not based on transport infrastructure needs to be supported, accessibility planning should identify where and how this should take place. Any transport infrastructure should be sustainable and suited to the needs of the key target communities intended to be the beneficiaries.

"A Thames Gateway bridge" is referred to in policy 3C.14 on page 143. This is currently proposed as a 6-lane bridge with 2 lanes currently designated for public transport use. The scheme is overwhelmingly of benefit to car drivers (94% of the benefits to road vehicles and 6% to public transport according to the Environmental Statement).

Yet in the wards closest to the scheme only a quarter to a third are car owners, according to the 2001 census. Transport for London admits the scheme would generate huge amounts of extra traffic and add to breaches of European air quality limits, and to climate changing emissions. Whether the scheme would actually have the claimed regenerating effect in the area is not even certain - Transport for London admitted at the end of the public inquiry into the scheme, yet the draft London Plan asserts the scheme would.

The scheme would also lock the area into high-carbon, car-dependent patterns of commuting and development. This would make the compact city – which the Mayor says London must become - more difficult to achieve. High quality public transport is needed to support high density development. The Stern Review (see above) says that investments which lock in high emissions “will make emissions cuts later on much more expensive and difficult”.

**Recommendation:** Alternative ways of helping the area must be properly considered so that local people can have improved accessibility to jobs and services but without the adverse impacts of this scheme, and so that regeneration of the Thames Gateway can be developed more sustainably.

The London Plan should only support a Thames Gateway bridge that better meets these aims, and certainly not the specific proposal currently being pursued. Recent revisions to the Government's webtag guidance (see link below) will require schemes to be assessed for their carbon emissions, and for this to be given a monetary value. The Thames Gateway bridge as currently proposed must be re-evaluated on this basis.

[http://www.webtag.org.uk/webdocuments/3\\_Expert/3\\_Environment\\_Objective/3.3.5.htm](http://www.webtag.org.uk/webdocuments/3_Expert/3_Environment_Objective/3.3.5.htm)

### c. Air quality

The air quality section (5, chapter 4A) refers to achieving reductions in pollutant emissions and public exposure to pollution by various means including reducing the need to travel especially by car. Recent provisional data from the London Air Quality Network (LAQN) however, shows that London's air quality has deteriorated. The LAQN's research shows increases for both annual mean Nitrogen Dioxide (NO<sub>2</sub>) levels and for concentrations of small particles (PM<sub>10</sub>s) – for the year ended June 2006 when compared with 2005. Further LAQN says that it is “likely that the additional primary PM<sub>10</sub> arose from road traffic”.

<http://www.londonair.org.uk/london/asp/news.asp?NewsId=News10>

<http://www.londonair.org.uk/london/asp/news.asp?NewsId=News9>

**Recommendation:** The Mayor' Low Emission Zone (LEZ) for London will only reduce the area of London that would exceed European legal limits. We want the London Plan to bring forward whatever measures and policies are needed to ensure that the whole of London would not experience poor air quality breaching European legal limits.

Tackling air quality relates to the design and planning of transport. Current plans for the Thames Gateway Bridge, mentioned above, is a prime example of the way development will worsen air quality. Further, locations and standards of development are key - parking provision must be used as a method of controlling traffic, with car-free development being pursued especially near existing or planned transport hubs.

**Friends of the Earth will be submitting a comprehensive response to the consultation on the draft Further Alterations to the London Plan. This will include further material including on waste.**

## LONDON'S 5 SUB-REGIONS

The draft Plan proposes 5 sub regions comprising the following boroughs:

North London - Chapter 5, page 293

Barnet, Camden Enfield, Hackney, Haringey, Islington and Westminster

North East London - Chapter 5, page 304

The City, Tower Hamlets, Newham, Waltham Forest, Redbridge, Havering and Barking & Dagenham

South East London - Chapter 5, page 318

Southwark, Lewisham, Greenwich, Bexley and Bromley

South West London - Chapter 5, page 329

Croydon, Lambeth, Merton, Sutton, Kingston, Richmond and Wandsworth

West London - Chapter 5, page 337

Hammersmith & Fulham, Brent, Ealing, Harrow, Hillingdon, Hounslow and Kensington & Chelsea

## RESPONDING TO THE CONSULTATION AND TIMETABLE

The Mayor's website has the following page on the London Plan:

<http://www.london.gov.uk/mayor/planning/strategy.jsp>

The page linked below has the draft further alterations to the London Plan, as well as information on responding to the consultation (and from which the text below is extracted).

<http://www.london.gov.uk/mayor/strategies/sds/further-alt/ docs.jsp>

## Consultation arrangements

*These draft alterations to the London Plan are published for consultation and your comments are invited. Please reference your comments to the relevant policy or paragraph of the document. **All comments must be received by 5pm on Friday 22 December 2006.** They should be sent to:*

*Ken Livingstone  
Mayor of London (London Plan Further Alterations)  
Greater London Authority  
FREEPOST 15799  
London SE1 2BR*

*Or by email to [Londonplan@london.gov.uk](mailto:Londonplan@london.gov.uk), with "London Plan Further Alterations" as the title. **Please note, if you send in a response by email it is not necessary for you to also send in a hard copy.***

*Any representations made in relation to the proposed alterations to the London Plan will be made available for public inspection.*

## Timetable

*Below is the current timetable leading up to the adoption of the Further Alterations to the London Plan:*

1. **30 May - 21 July 2006**  
Consultation with the London Assembly and Functional Bodies
2. **28 September - 22 December 2006**  
Formal public consultation on the Further Alterations
3. **June 2007**  
Further Alterations Examination in Public (City Hall Chamber)
4. **Early 2008**  
Adoption and publication of the Further Alterations to the London Plan