

**Executive Meeting On 19 December 2006**

**Report Title:** Further Alterations to the London Plan

**Forward Plan Reference Number:**

**Report of:** Andrew Travers, Interim Director of Environmental Services

**Wards(s) affected:** All

**Report for:** Key Decision

**1. Purpose**

- 1.1 To consider and agree the Council's response to the draft Further Alterations to the London Plan.

**2. Introduction by Executive Member**

2.1

**3. Recommendation**

- 3.1 That the responses to the draft Further Alterations to the London Plan as set out in Appendix 1 be agreed and submitted to the Mayor of London.

**Report Authorised by:** Andrew Travers, Interim Director of Environmental Services

**Contact Officer:** Malcolm Souch, Team Leader Planning Policy (extension 5590)

**4. Executive Summary**

- 4.1 The draft Further Alterations to the London Plan constitute a first review of the Mayor's London Plan, which was adopted in February 2004. They include previously published Early Alterations which relate to housing supply, waste and minerals. The aims and objectives of the original London Plan remain largely unchanged and the further alterations focus on themes identified in a Statement of Intent published in December 2005.
- 4.2 The draft Further Alterations extend the timeframe of the original Plan from 2016 to

2025/6 and focus on strengthening some of the key policy areas which have developed since the publication of the original London Plan, including climate change, London's geography and its suburbs.

- 4.3 The draft further alterations are accompanied by a sustainability appraisal report, a scenario testing report and an equalities impact assessment. The draft Further Alterations have been published for public consultation and the closing date for comments is 22 December 2006.
- 4.4 The London Plan now forms part of Haringey's statutory development plan and its spatial strategy, growth assumptions and targets will shape Haringey's Local Development Framework, which is required to be in general conformity with the London Plan. Therefore, it is important that the Council comments on the alterations and scrutinises the evidence and growth assumptions. The further alterations and supporting evidence will be debated at a Examination in Public and the Council will have the opportunity to provide further representations to support its submitted comments.
- 4.5 The draft Further Alterations are generally welcomed, particularly the focus on climate change and London's suburbs. However, there are some key concerns regarding the sustainability of the plan to 2026 and the interrelationship between housing and employment growth and transport, community and utility infrastructure, the deliverability of affordable, energy efficient homes, particularly family housing and whether alterations give sufficient attention to outer London boroughs like Haringey. There are also sub-regional issues, particularly waste apportionment and a new sub-regional structure which will require further discussion with sub-regional borough partnerships and a coordinated response for the Examination in Public.

## **5. Reasons for any change in policy or for new policy development**

- 5.1 The draft Further Alterations to the London Plan have been prepared by the Mayor of London for public consultation under the provisions of s341 of the Greater London Authority Act 1999.

## **6. Local Government (Access to Information) Act 1985**

- 6.1 The following documents were used in the preparation of this report:-
- Draft Further Alterations to the London Plan (Spatial Development Strategy for Greater London) and accompanying Sustainability Appraisal – September 2006
  - Draft Early Alterations to the London Plan Examination in Public Panel Report – September 2006

## **7. Background**

- 7.1 The London Plan was adopted in February 2004. It sets the strategic spatial development priorities and policies for London until 2016 and underpins much of the work of the Greater London Authority.
- 7.2 The Mayor has a legal duty to keep the London Plan under review and up-to-date

as well as ensure that the Mayor's strategies are consistent with each other. In December 2005, the Mayor published a Statement of Intent which set out the scope of the further alterations to the Plan. A public consultation version of the draft alterations was produced in September 2006, which is accompanied by a sustainability appraisal report. The public consultation period runs until 22 December 2006. The Examination in Public and the Panel's report is timetabled for Summer 2007 and it is intended that the altered London Plan will be published in early 2008.

- 7.3 In October 2005, the Mayor published for public consultation early draft alterations to the London Plan on housing supply, waste and minerals. These matters have been subject to an Examination in Public and the Panel Report was published in September 2006. The early alterations will come into effect from April 2007 and are included in the further alterations version of the Plan.
- 7.4 The Mayor's responses to the Panel's report have been included in the Further Alterations. However, they remain subject to final approval and the receipt of no direction from the Secretary of State. In many cases, the Panel's recommendations have resulted in further alterations.
- 7.5 In December 2005, the Mayor of London published a Statement of Intent on the review of the London Plan. The Statement set out the scope of the alterations to the London Plan.

## **8. Introduction**

- 8.1 Most alterations to the London Plan are amendments to clarify points or to take account of new information. Much of the London Plan remains unchanged. Most of the proposed significant policy changes reflect issues highlighted in the Mayor's Statement of Intent. There are 65 new or significantly altered policies and the alterations would increase the number of policies in the London Plan from 184 to 205.
- 8.2 The alterations address most policy areas of the Plan. The most substantive alterations proposed for the London Plan are a group of new policies associated with climate change, renewable energy and sustainable design and construction. Chapter 5 of the Plan has been re-written to conform to new sub regional boundaries. However, most of the policies relating to the sub-regions are not new and are largely the existing policies applied to the new sub regional geography.

## **9. Summary of Further Alterations and Responses**

- 9.1 Appendix 1 sets out the detailed responses on the draft Further Alterations. Set out below is a summary of key issues and responses.

### Process and scope of the review

- 9.2 The draft Further Alterations to the London Plan constitutes a first review of the Mayor's London Plan, which was adopted in February 2004. The review has focused on selective alterations to the Plan and many areas have been left largely

unchanged.

- 9.3 The draft further alterations increase the number of policies and level of detail in the London Plan and require boroughs in their Development Plan Documents to undertake additional work. Haringey's Local Development Framework will need to address these policy areas to conform to the altered London Plan.

*Response*

- 9.4 The further alterations are generally supported, particularly the emphasis given to key policy issues on climate change and London's suburbs. Although detailed guidance is welcomed, it should be recognised that many new and altered policies place additional requirements on Development Plan Documents, for example policies on areas deficient in access to nature and areas of relative tranquillity in relation to noise impact. The Mayor should acknowledge that new policy requirements will require additional resources and new skills at a borough level.

- 9.5 It is noted that important policy areas have not yet been reviewed, for example Strategic Employment Locations, the town centre network and policies, the Blue Ribbon Network and London-wide gypsy and traveller accommodation needs. In addition, there has been little policy assessment to determine the effectiveness of existing policies, prior to proposing changes. With the exception of the Sub Regional Development Frameworks the evidence base for the new and altered policies has not been published.

- 9.6 Whilst the early alterations on housing supply, waste and minerals have been included in the further alterations, separating these alterations has confused the review process. It is not clear whether the Examination in Public Panel's recommendations on the early alterations have been addressed fully in the further alterations. This should be clarified. It would also be helpful if the further alterations referred specifically to the proposed changes to the powers and responsibilities of the Mayor and Assembly.

A Spatial Strategy for London

- 9.7 The draft further alterations include a new policy which sets out a spatial strategy for London. It brings together many policies of the plan, such as new policies on growth areas and the relationship with the wider metropolitan region and London's suburbs. The Mayor considers that together the new policy constitutes a 'polycentric development strategy' which addresses the role of each part of London. The further alterations extend the Plan timescale from 2016 to 2025/26, but in many areas the existing policies and targets remain unchanged.

*Response*

- 9.8 The new policy setting out a more comprehensive spatial strategy is welcomed. However, in responding to the draft North London Sub-Regional Development Framework (SRDF), the Council requested that the final SRDF should provide more detail on proposals for essential social, transport and utility infrastructure and the relationship between housing growth and that infrastructure requirements

should be fully addressed in the London Plan review. The new spatial strategy policy does not fully address the impact of growth on infrastructure and the relationship between the level and pace of development and infrastructure needs and capacity. The altered Plan states that, as a broad rule, there is sufficient land to accommodate projected growth. However, there is no analysis to support this assumption.

- 9.9 The further alterations extend the Plan timescale from 2016 to 2026. However, insufficient evidence and policy review has taken place to address the impact of this growth. The further alterations include an updated table showing indicative phasing of growth in jobs and homes by sub-region up to 2026 and a new table showing indicative phasing of public transport capacity increases by sub-region up to and beyond 2022. Unfortunately there is little analysis of the relationship between the two tables, particularly below a sub-regional level. The preparation of the further alterations has been informed by a parallel scenario development and policy testing exercise. The scenario testing exercise has not fully addressed the impacts of growth on social, transport or utility infrastructure.

#### Climate Change, Renewable Energy and Sustainable Design and Construction

- 9.10 The further alterations focus on ensuring that new development, transport provision and waste management arrangements and investments are designed to help mitigate climate change and to be adaptable to its effects. Other initiatives such as changing behaviour and lifestyles and developing cost efficient ways of 'retro-fitting' existing buildings and transport investment will be addressed more specifically in the Mayor's other strategies, notably a forthcoming Climate Change strategy. Nevertheless, a new policy supports programmes to refurbish buildings which will reduce carbon emissions, increase thermal efficiency, reduce waste and noise impacts, conserve water materials and other resources.
- 9.11 The draft alterations propose to set carbon dioxide reduction targets with a long-term target of a 60% reduction by 2050. The Mayor has set the following minimum targets for London (against a 1990 base):
- 15 per cent by 2010
  - 20 per cent by 2015
  - 25 per cent by 2020
  - 30 per cent by 2025
- 9.12 The draft further alterations set out a series of complementary policies to achieve carbon dioxide reductions, including doubling the carbon emission reductions that developments should achieve through onsite renewable energy from 10% to 20%. Opportunity Areas are seen as having particular potential for adaptation and mitigation measures concerning climate change.

#### *Response*

- 9.13 The emphasis given to climate change in the further alterations is welcomed and supported. Haringey's Unitary Development Plan already contains policies on sustainable design and construction, a requirement for 10% on-site renewable

energy and policies on energy efficiency in buildings. The Mayor is encouraged to provide design guidance on how the 20% on site renewable energy target is to be achieved.

- 9.14 It should be fully recognised that these targets are also dependent on measures other than planning policy such as changing behaviour and lifestyles and 'retro-fitting' existing buildings. The Council is currently exploring local targets and carbon reduction scenarios and through this process will identify levels of intervention necessary to achieve these targets at a borough level. The staggered long term carbon reduction targets are welcomed as is the commitment to monitor and review these targets. Further research on the contribution of new development in reducing overall carbon dioxide emissions would be helpful.

#### Water and Waste Management

- 9.15 A number of alterations are proposed for policies on flood protection and management and waste planning. Greater emphasis is given to flood risk and sustainable drainage. The further alterations set a maximum water use target for residential development which should be achievable through using water efficient fixtures and fittings.
- 9.16 In addition to recycling or composting targets for municipal waste proposed in the early alterations, the further alterations propose recycling or composting targets for commercial and industrial waste. The further alterations incorporate early alterations to safeguard all existing waste sites and identify new sites for new facilities and identify broad locations suitable for recycling and waste treatment facilities. Borough waste apportionment figures for municipal and commercial / industrial waste has been published as a separate minor alteration on 22 November.

#### *Response*

- 9.17 The attention given to flood risk and sustainable drainage is supported. The alteration on sustainable drainage, to include recognition of the contribution of landscaping in front gardens is welcomed. With regard to the water use target, the Mayor should identify measures to support boroughs to ensure that design features identified in sustainability statements are actually implemented during the construction stage.
- 9.18 The final report detailing the waste apportionment methodology will be made available in early December. Until this time it is not possible to comment on the borough apportionment figures. One of the key inputs into the model is borough level assessments of employment land. There is a concern regarding the reliability of the desk-top assessments of employment land, particularly as the figures have been produced in advance of a review of Strategic Employment Locations.
- 9.19 The North London Joint Waste Development Plan Document will consider options for managing waste that will be generated across the seven boroughs and will identify and safeguard sites for managing and recycling that waste using a mix of different technologies. In advance of this document, it is considered that the

identification of Strategic Employment Locations and Local Employment Areas as broad locations for waste facilities is not appropriate.

### London's Economy

- 9.20 The further alterations seek to develop London's economy and predict a net overall growth of 847,000 jobs in London between 2006 and 2026. However, outside central London the further alterations seek to consolidate office locations, release commercial sites to housing, waste and transport facilities and encourage mixed use development. The further alterations do recognise that new economic sectors will emerge, including environmental industries. There is a new policy on improving employment opportunities for Londoners with an emphasis on access to affordable and accessible childcare and on improving skills.
- 9.21 The further alterations include new borough employment forecasts to support the overall growth figure for London and an altered table showing phasing of growth in jobs and homes to 2026. These forecasts are based on a different methodology from previous forecasts.

### *Response*

- 9.22 The further alterations raise important issues for the future of Haringey's local economy which will require further research and discussion. The alterations refer to strategically specified office locations outside central London, without defining where they are. In particular, it is unclear whether Opportunity Areas or Wood Green Metropolitan Centre would fit into this category.
- 9.23 It is disappointing that the Strategic Employment Locations were not reviewed as part of the alterations to the London Plan. This is needed in response to early alterations on housing supply and waste planning which refer to surplus employment land as a source of additional housing and for waste management facilities. Also, the designation of Strategic Employment Locations is inconsistent with the designation of Tottenham Hale as an Opportunity Area and Haringey Heartlands as an Area for Intensification as it does not reflect residential led mixed use regeneration in these areas. Also other locally significant industrial sites may benefit from strategic protection.
- 9.24 The new employment forecasts improve Haringey's employment prospects. The forecasts estimate that jobs in Haringey will increase by 13,000 between 2006 and 2026 (a 17.1% net growth). This represents a significant increase from the previous employment forecast for 2006-2016. The difference is attributed to a change in methodology. The employment future of Haringey is a key policy issue. The employment forecasts and implications will require further scrutiny and discussion, particularly with sub-regional partners. Further work is underway to address the interrelationships between employment growth, housing growth and transport infrastructure and the implications for employment areas, town centres and Opportunity Areas.

### Housing

9.25 The early alterations and some of the Panel's recommendations addressing housing supply and borough targets have been incorporated into the further alterations document. Further alterations are also proposed to refine the housing density matrix and site character definitions and new policies are proposed on quality of new housing provision and affordable housing thresholds. A new table rolls forward indicative borough housing capacity to 2026/27.

*Response*

9.26 The further alteration to refine the housing density matrix and the new policy on affordable housing thresholds are supported. The refinements to the density matrix should encourage a better mix of dwelling sizes including larger units and recognise that large areas of the borough are suburban in character.

9.27 The Plan is rolled forward to 2026/27. The new annual housing capacity range for Haringey up to 890 dwellings per annum exceeds the current annual target of 680 additional homes. Although these figures do not constitute targets, they should not be contained with the London Plan as part of the development plan for Haringey in advance of a 2011 London Housing Capacity or any borough housing capacity assessment. The further alterations do recognise that traditional sources of housing supply are drying up and new options will have to be explored. As such the new borough figures are premature. Future housing capacity studies should address transport, social and utility infrastructure provision.

Transport

9.28 The Mayor's Transport Strategy will be revised in conjunction with the London Plan review. The key further alterations relating to transport include a greater emphasis on walking and cycling, closer integration of transport investment with public realm improvements, rolling forward a target for a 50% increase in public transport to 2026 (to match growth requirements), measures to make more effective use of existing and already planned transport capacity, for example Victoria and Piccadilly Line upgrades by 2013/2014. A updated table showing indicative phasing and status of major transport schemes is provided and includes improvements to Tottenham Hale interchange and gyratory (by 2017), longer term enhancements to the West Anglia Railway (post 2022) and North London Railway enhancements (by 2012) which includes creation of an orbital railway by linking and enhancing the East, West and North London lines, including electrification of the Gospel Oak to Barking line (Orbirail).

*Response*

9.29 The identified transport schemes in Haringey are supported. Enhancements to the capacity of the West Anglia rail corridor is a key requirement to unlock the growth potential in the Upper Lee Valley and the London-Stansted-Cambridge-Peterborough growth area, in particular the development at Tottenham Hale. However, completion of longer term enhancements to the West Anglia Railway are phased post 2022 and this presents a risk to the regeneration of the Opportunity Area, the growth area and Tottenham Hale. In addition, the further alterations should fully recognise the importance of direct rail linkage along the Lee Valley line



between Tottenham Hale and Stratford and direct services from Seven Sisters to Stratford to support sustainable access to Stratford and the Olympics site and for the Olympics legacy.

#### London's sub regions

- 9.30 The draft further alterations propose a new sub regional structure. This will have implications for many of the London Plan policies and the growth assumptions and targets in the altered Plan. In turn the new structure will influence the spatial strategy of borough Local Development Frameworks. The options for a new sub regional structure were considered in a Review of Sub-Regional Boundaries by Addison and Associates for the Greater London Authority in June 2006. The review considers five options:
- A. existing London Plan sub-regions
  - B. centre and four outer London sector sub regions
  - C. five radial sector sub regions
  - D. four radial sector sub regions with East sub region split at the Thames
  - E. four radial sector sub region with East unchanged.
- 9.31 The further alterations propose the adoption of 'Option C' which would include five sub-regions with no central sub-region. The new structure is based on a radial rather than a concentric structure and seeks to integrate the outer, inner and central parts of London and improve arrangements for spatial planning in London. A radial structure is considered more appropriate for coordinating and implementing strategic policy and delivery of key services. The new North sub-region would include the boroughs of Barnet, Camden, Enfield, Haringey, Hackney, Islington and Westminster.
- Response*
- 9.32 The Addison and Associates report notes that altering the sub regional structure would involve considerable upheaval, change of practice and discontinuity of action, and that there needs to be a strong justification for making such changes. It is considered that a strong justification for the proposed change has not been made.
- 9.33 It is recognised that the other options have advantages and disadvantages. Option B would place Haringey (along with Enfield) in a North East sub region which would align with the Central Activities Zones, London-Stansted-Cambridge-Peterborough Growth Area, but would split rail corridors and some existing sub regional partnerships, such as the north London housing sub region and the North London Waste Authority.
- 9.34 The report identifies that the main advantage of a radial structure (Options C, D and E) is that it links central boroughs, with limited development opportunities with greater opportunities in outer London, particularly in relation to housing and waste disposal. Option C, with a north London sub region, broadly aligns with the north London housing sub region and the North London Waste Authority, but splits the London-Stansted-Cambridge-Peterborough Growth Areas, the Central Activities

Zone and main line rail corridors.

- 9.35 Options D and E propose four radial sectors and raise similar issues to Option C. Option D includes Haringey within a North East sub region and aligns with the London-Stansted-Cambridge-Peterborough Growth Area and most main line rail corridors. However it does not align with existing sub regional partnerships. Option E is similar to Option C, the only difference being in North London where Waltham Forest is included at the expense of Hackney.
- 9.36 It is considered that the Mayor should provide further justification for a new sub regional structure having regard to the need for a manageable sub region whose boroughs share common issues and solutions to spatial planning and to ensure that boundaries offer a 'best fit' with the growth areas, the Central Activities Zone and existing partnerships, such as the waste authority areas and the housing sub-regions.

#### London's suburbs

- 9.37 A key spatial priority for the altered London Plan is the focus on London's suburbs and their varied communities. A new policy is proposed which promotes local economies, focuses development in town centres at higher densities, improves local services and facilities, maintains and improves the features of London's suburbs, such as open space and encourages a low carbon emission approach across London's suburbs.

#### *Response*

- 9.38 The detailed policy on London's suburbs is supported. However, crucial to its implementation is the interrelationship between housing and population growth and employment growth in outer London. The main conclusion from the housing targets and employment forecasts is that Haringey is likely to develop as a 'residential dormitory' and will not be able provide sufficient employment opportunities for its growing population and will have to increasingly rely on other parts of London and beyond to provide job opportunities for its residents. This is likely to increase levels of commuting on a transport network which is already overcrowded and congested.
- 9.39 The role of outer London town and local centres is crucial to the future sustainability of London's suburbs. The emphasis on enhancing town and local centres is welcomed. The Mayor is urged to undertake further work on London's strategic town centre network, the role of local shopping centres in outer London and the benefits of diversifying 'out of centre' locations and improving their public transport accessibility.

### **10. Sustainability Appraisal**

- 10.1 The draft Further Alterations are accompanied by a sustainability appraisal report. The purpose of the sustainability appraisal is to assess the potential effects of the further alterations to the Plan, to identify recommendations for mitigation measures that would address any potentially adverse effects, and ultimately to improve the

sustainability of the Plan. The aim was to increase consistency of implementation of policies and adequately address a number of key issues, rather than to propose radical revisions.

10.2 A set of 20 objectives were selected to assess the potential effects of the Plan. As the London Plan is to be altered rather than replaced two main options were considered:- do nothing and continue applying the London Plan as it stands or make alterations, which strengthen policy in several areas in the pursuit of sustainable development.

10.3 The sustainability appraisal accepts that growth will occur in London and concludes that the alterations will improve the sustainability of the Plan. It is recognised that the review of the London Plan has resulted in selective alterations and that inevitably there will be outstanding issues regarding the provision of social, utility and transport infrastructure which will require further discussions with stakeholders and addressed through complementary strategies, for example a revision to the Mayor's Transport Strategy and a forthcoming draft Water Action Framework.

## **11. Consultation**

11.1 The Mayor of London is responsible for consultation on the draft Further Alterations to the London Plan. Public consultation of the draft alterations will close on 22 December 2006. An Examination in Public on the alterations is scheduled for Summer 2007 and it is intended that the altered London Plan will be published in early 2008.

## **12. Summary and Conclusion**

12.1 The London Plan forms part of Haringey's statutory development plan. Haringey's Unitary Development Plan is required to be in general conformity with the London Plan. The UDP and the subsequent Local Development Framework will need to reflect the new and altered policies of the London Plan. It is therefore important that the Council responds to the draft Further Alterations to the London Plan.

## **13. Recommendations**

13.1 That the responses to the draft Further Alterations to the London Plan as set out in Appendix 1 be agreed and submitted to the Mayor of London

## **14. Comments of the Director of Finance**

14.1 The financial implications of the impact of the London Plan on the Council will need to be assessed as part of formulating and implementing any specific elements of the Plan. Generally any additional unbudgeted cost pressures will need to be considered as part of the Council's relevant financial planning cycle.

## **15. Comments of the Head of Legal Services**

15.1 The Head of Legal Services has been consulted on the report and the responses to

the Draft Further Alterations to the London Plan, and her comments have been incorporated and there is nothing to add.

## **16. Equalities Implications**

16.1 The London Plan is the responsibility of the Mayor of London. The further alterations to the London Plan are accompanied by an Equalities Impact Assessment (September 2006). The draft further alterations strengthen the social inclusion objectives of the London Plan and note the importance of improving the quality of life of the poorest Londoners by improving their economic base and reducing barriers to employment opportunities. The objectives have also been strengthened to include the provision of health and childcare facilities as well as play space within key social infrastructure requirements, and to directly address health inequalities. The action plan produced as a result of the initial Equalities Impact Assessment will be reviewed after the consultation process has been carried out on the draft Further Alterations.

## **17. Appendices**

17.1 Appendix 1 – Responses on the Draft Further Alterations to the London Plan