



London Sustainability Exchange Response to the public consultation on *Planning for a Better London*

November 2008

Introduction

London Sustainability Exchange welcomes the opportunity to contribute to the ongoing development of the London Plan and to participate in the continued flourishing of London as a truly sustainable city.

Here we set out our response, which draws on the findings of policy seminars held by LSx during November 2008.

Scope of our response

We broadly agree with the analysis of the challenges facing London, set out in part two of the report. We would however argue that the seriousness of the current economic and environmental crises, and the possible impacts on Londoners, is underplayed.

Our comments are therefore focused on part three of the document – *Key policy responses*.

We will comment on the approach the document has made on:

1. Sustainable Development and living within environmental limits
2. Scope of the London Plan and ensuring it is delivered
3. Moving towards a low carbon economy
4. The London Planning Convention
5. Quality jobs for London
6. Reducing environmental impacts of existing buildings

1. Sustainable Development & living within environmental limits

London Sustainability Exchange would support the integration of sustainability into all policies. If this were to be achieved, policies would be more successful in improving the quality of life of Londoners year on year.

The report does not make clear the wider implications of development outcomes and particularly how the next iteration of the London Plan will quickly move London in the direction of “living within our environmental limits” as set out by the UK Sustainable Development Strategy *Securing the Future*¹.

¹ <http://www.defra.gov.uk/sustainable/government/publications/uk-strategy/index.htm>

Recommendation 1

A strengthened definition of sustainability should be included early on in the London Plan. We endorse the "Vision for London", set out in the London Sustainable Development Framework (which should be referenced). There should be clear emphasis on the need to reduce the London's environmental footprint.

"...working to develop a coherent approach to sustainable development throughout London, not only to improve the quality of life for people living, working and visiting London today and for generations to come, but also to reduce London's footprint on the rest of the UK and the world."

London Sustainable Development Commission

2 Scope of the London Plan, and ensuring it is delivered

We support the Mayor's intention to take a more consensual approach to working with other public sector bodies and the private sector.

We are concerned about the apparent intention desire to **slim down the London Plan**, and relocate some of its contents to planning guidance documents. Whilst the Mayor's Spatial Development Strategy (i.e. the London Plan) should not get bogged down in minutiae, it is also critical that it remains sufficiently comprehensive that its strategic weight is not lost.

While moving the expression of certain policies and actions into Supplementary Planning Guidance could be sensible in some instances, **we would be cautious of any large scale movement of climate change policy (for instance) from the Plan to Guidance**, due to the lesser statutory weight carried by SPG.

Further to this, we are concerned that the current sentiments expressed in the document indicate that the Mayor will sometimes refrain from using the powers given to him. We accept the need to keep the focus of the Plan at a strategic level, but there is still the need for the Mayor to use his powers so that his own targets in both the Plan and his other statutory and non-statutory strategies can be met.

Experience of working with the boroughs would indicate that **major infrastructure requirements**, such as new waste processing capacity, **might need specific support from the London Plan**. Otherwise there is a risk that large projects would take too long to get up and running. The LWaRB would find its work in providing waste infrastructure compromised by extremely costly exercises to put forward each planning application on a case-by-case, borough by borough basis without the support of a strategic document which identifies the need for such infrastructure.

Finally, whilst we understand the sentiment behind the intention to move away from relationships marked by *"too much emphasis on direction, targets and attempts to exert control"*, **we are keen to see alternative mechanisms to ensure that the desired outcomes are delivered**. We therefore recommend that the Mayor identify which indicators will be regularly measured and reported on.

Recommendation 2

The next iteration of the London Plan should clearly identify the Mayor's aspirations in terms of the use of such as open spaces, renewable energy requirements and affordable housing.

The Mayor should also identify which indicators will be regularly measured and reported upon.

3 Moving towards a low carbon economy

We question the validity of the basic assumptions that both this report and the current London Plan make about **economic and population growth**, given the current economic difficulties.

Furthermore, the next iteration of the London Plan needs be underpinned by a clearer understanding of what levels of **economic growth in London are consistent with delivering sustainable consumption and production and a low carbon economy**. The current economic correction provides a moment to challenge the widely held view that economic progress is dependent on continued increases consumer spending. There is a considerable groundswell of opinion that if we want to avoid catastrophic climate change, and at the same time endlessly continue with previous levels of economic growth and consumption, we would need to reduce the carbon intensity of our spending to a fraction of what it is now. We have a limited understanding of how such a radical transformation could be possible.²

Recommendation 3

The next iteration of the London Plan needs be underpinned by a clearer understanding of what levels of economic growth in London are consistent with delivering sustainable consumption and production and a low carbon economy.

4 London Planning Convention

The intention to provide information and specialist advice on planning across London to support policy-making, monitoring implementation, evaluation and review is welcomed. The latter is important considering the changing context within which planning decisions are being made. We agree with the report that there is a role for the Mayor to help address problems that face neighbouring London regions.

The London Planning Convention could be a good opportunity to consider the relationship between economic growth, consumption, carbon emissions and quality of life (see point 3).

Recommendation 4

We support the London Planning Convention as an opportunity to consider elements pertinent to delivering effective quality of life in London, providing appropriate quality of life indicators are considered, and that the findings of the Convention can influence Mayoral policies and targets.

² See <http://www.newscientist.com/channel/opinion/mg20026786.100-special-report-why-politicians-dare-not-limit-economic-growth.html>

5 Quality Jobs for London

Despite a clear commitment to improving the quality of life of Londoners, the current London Plan is weak on delivering aspects of well-being and equality. Job numbers are recorded and prioritised but the *quality* of jobs is given little or no attention. It would be short-sighted to merely monitor the number of jobs created without establishing if these jobs existed 6 months later or that the individuals initially employed are still employed.

Recommendation 5

We recommend that the next London Plan takes into account evidence on the longevity, type and quality of jobs to ensure that employment is sustainable, not disposable.

The Skills Observatory could have a role in finding out more about employment and skills options Londoners don't like or won't consider, in order to match local labour to the opportunities available.

6. Reducing environmental impacts of existing buildings

The fact that current building stock contributes 73% of total CO₂ emissions is a clear indication that **this needs to be tackled with a strong and clear policy**. Guidance to the boroughs will be of great importance, and it is in an area where the Mayor will be most effective in working in partnership.

New developments could potentially provide a catalyst for investment in energy infrastructure such as Combined Heat and Power Stations that would benefit existing as well as new housing stock.

Recommendation 6

A distinct policy is required to directly address the retrofitting needs of existing buildings separate to new build policies, including a set of tailored regulations.

About London Sustainability Exchange

London Sustainability Exchange (LSx) aims to accelerate the transition to a sustainable London by connecting and motivating people.

As a charity we work in partnership with business, government and the voluntary sector to:

- Reduce London's environmental footprint
- Improve the lives of London's disadvantaged communities
- Improve the health of Londoners
- Improve the knowledge and skills of our communities to achieve these goals

To achieve these goals we run learning networks and innovative exemplar schemes. We also seek to influence policy and practice throughout London.

We were founded in 2001 by the City of London and a group of influential partners, who continue to shape our development. In April 2008 we became an independent charity, having

initially operated as a programme of Forum for the Future. We encouraged over 75,000 people in 2006 to take up sustainable lifestyles through tailored pilot projects. We are sharing the learning on how to motivate behaviour change in diverse communities with hundreds of professionals across the capital.

Building on these foundations, we are now working to green London's food and drink sector, and actively supporting the delivery of a sustainable legacy for the London 2012 Olympic Games.

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