

DRAFT REPLACEMENT LONDON PLAN

EXAMINATION IN PUBLIC

TARGETS IN THE LONDON PLAN

STATEMENT TO THE EXAMINATION ON BEHALF OF THE MAYOR OF LONDON

The Government has indicated that, following the removal of references to regional strategies in Government statements of planning policy (many of which also applied to the London Plan), it considers that these requirements, including requirements to set targets no longer apply. It has stated that “if the Mayor chooses to propose targets on particular matters this will be a matter for him and London partners to consider”.

In preparing the Plan, the Mayor has sought to apply the principles he set out in “Planning for a Better London” (July 2008):

“Overall outcomes will matter more than processes or structures. There will therefore be less emphasis on targets and the machinery that goes with them, which can all too easily become ends in themselves, and a distraction from the bigger picture. There will, however, be rigorous monitoring of policy implementation and assertive management of obstacles that put agreed planning objectives at risk”.

The need to include targets was examined rigorously as the draft replacement Plan was prepared and brought forward. In general, the Mayor retained those that added value in delivering Londonwide planning objectives, and which clearly supported his wider strategic functions. There were a few cases, however, in which targets were brought forward solely to meet requirements set out in Government policy statements or circulars.

Following the Government’s announcement at this examination, there has been a further review of the targets in the Plan. For the most part, the Mayor will support continued inclusion of the targets, benchmarks or standards he has put forward in the DRLP. There are a few areas in which he was required to take a particular direction by Government guidance which now no longer applies to him, and where he is now proposing to take a different course. Taking each chapter in turn, in the order they are being considered at the EiP:

Chapter Two

- **Policy 2.13 and Annex 1: Opportunity/Intensification areas:** The Mayor considers that the indicative jobs and homes targets for Opportunity and Intensification areas are valuable indications of the order of growth envisaged in each case. He intends to retain them.

Chapter Four

- **Policy 4.2: Offices:** The Mayor supports continued inclusion of office supply benchmarks
- **Policy 4.4: Managing industrial land:** The Mayor supports continued inclusion of the benchmark figure for release of industrial land.
- **Policy 4.5: Visitor Infrastructure:** The Mayor supports continued inclusion of targets for additional hotel bedrooms and for wheelchair accessibility.
- **Policy 4.7: Retail and town centre development:** The Mayor supports continued inclusion of benchmarks for additional comparison (paragraph 4.38) and convenience (paragraph 4.40) retail.

Chapter Five

- **Policy 5.1: Climate change mitigation:** The Mayor supports continued inclusion of his overall 60 per cent emissions reduction target.
- **Policy 5.2: Minimising carbon dioxide emissions:** The Mayor supports continued inclusion of targets for carbon dioxide emission reductions for residential and non-residential buildings.
- **Policy 5.5: Decentralised energy networks:** The Mayor supports continued inclusion of the target for 25 per cent of heat and power being generated through the use of localised decentralised energy systems by 2025.
- **Policy 5.7: Renewable energy:** The targets for installed energy capacity generated from renewables (table 5.1 on page 125 of the DRLP) were brought forward in accordance with the requirements set out in PPS22. The Mayor had in any case made clear his intention to update the data in the table. Given that he is no longer required to publish the targets in their current form in the DRLP, he proposes to remove table 5.1, and to publish an updated table of targets as supplementary guidance. This will give him greater flexibility about the format of the targets and he intends to provide borough-level detail to help inform LDF preparation. It will also provide greater flexibility to keep the targets up to date. The Mayor will consider if there is a case for reincorporating the targets in the London Plan through a future alteration in the light of comments made during the EiP discussion of this policy, and in consultation responses to the draft SPG.
- **Policy 5.10: Urban greening:** The Mayor supports continued inclusion of the target for increasing the amount of surface area greened in the CAZ.
- **Policy 5.15: Water use and supplies:** The Mayor supports continued inclusion of water consumption targets for residential development.

- **Policy 5.16: Waste self-sufficiency:** The Mayor supports the target of working towards managing 100 per cent of London's waste within London by 2031 and the various recycling/composting targets set out in Policy 5.16B.
- **Policy 5.17: Waste capacity:** The Mayor supports continued inclusion of the waste apportionments set out in table 5.3.
- **Policy 5.20: Aggregates:** This policy requires six boroughs (Havering, Redbridge, Ealing, Hillingdon, Hounslow and Richmond) to provide 1 million tonnes in total of aggregates until 2020. This requirement derives from Annex A of Minerals Policy Statement 1, which required regional planning bodies to apportion the regional guideline figure to boroughs, and then to monitor and review.

The Mayor considers that continued inclusion of a target for aggregates continues to fulfil a useful strategic purpose, but the removal of national requirements allows him to set this at a more realistic and achievable level. He intends to bring forward suggested a revised target of 500,000 tonnes per annum.

Chapter Six

- **Policy 6.9: Cycling:** The Mayor supports retention of his target for cycling to account for at least 5 per cent of modal share by 2026.
- **Policy 6.13: Parking:** The Mayor supports continued inclusion of the parking standards set out in the addendum to Chapter Six.

Chapter Seven

- **Policy 7.18: Local natural space and local deficiency:** The Mayor supports retention of benchmarks for public open space provision.
- **Policy 7.19: Biodiversity and access to nature:** The Mayor supports retention of the Biodiversity Action Plan targets set out in table 7.3.

Chapter Three

- **Policy 3.3: Housing supply:** The Mayor has considered the need to retain Londonwide housing provision monitoring targets particularly carefully. He has come to the conclusion that because of the Mayor's particular strategic responsibilities and priorities for managing and coordinating housing growth sustainably in London, and the importance of housing supply to London as a whole and to the delivery of the whole range of economic, social and environmental priorities, he supports their continued retention. London is generally accepted to be a single housing market area, with borough boundaries having little relevance to housing market issues. Planning for housing in London is therefore more than a local issue, and the Mayor considers that this supports a strategic, citywide approach – particularly given his statutory strategic housing responsibilities.

He is strengthened in this view by the fact that the current targets have been prepared in close partnership with the boroughs and other stakeholders through the preparation of both the Strategic Housing Market Assessment and the Strategic Housing Land Availability Assessment.

Having said all this, the Mayor is convinced that now the Government has removed the highly prescriptive requirements about how targets should be drawn up and tested, there are better and more inclusive ways of preparing the next round of targets that better reflect the particular needs and circumstances of London. Over the next two years or so, he will work with boroughs and other stakeholders to develop and implement an approach that meets these objectives, builds in a more bottom-up, participative and consensual approach and reflects the “resource for localism” principle he set out in his opening speech to the EiP. This approach will be used over this period to prepare an early alteration to the Plan.

- **Policy 3.5: Quality and design of housing:** The Mayor strongly supports the inclusion of the space standards for new development in table 3.3.
- **Policy 3.9: Gypsies and travellers (including travelling showpeople):** The Mayor has been clear that setting detailed targets is not the most effective or fair way to deliver real improvements in the provision of pitches for gypsies, travellers or travelling show people. He has also expressed detailed concerns about the extremely prescriptive process that was mandated for the drawing up of these targets.

Accordingly, he intends to replace the current policy 3.9 and table 3.4 with a different policy approach that will enable boroughs and stakeholders to meet required needs in the light of local circumstances.

The Mayor agrees that the changes he intends to propose to policies 3.9 and 5.20 go beyond what is appropriate to deal with as “suggested early changes”, and that they should be subject to public consultation. He therefore proposes to bring forward a further set of what have been termed “minor alterations” (as he has before to deal with policies on waste and gypsy and traveller provision). He intends to publish these in mid-September.

This means that consideration of the relevant policies at this examination will have to be postponed to allow for this consultation to take place, for the results to be considered and assimilated, and for preparations to be made for examination. The Mayor’s representatives are in discussion with the Panel secretariat about the dates for these further sessions. They are likely to take place in early December; a further announcement will be made shortly.

This is a particularly difficult time to be examining a Plan of this kind, and the Mayor is grateful for the understanding of the Panel and other EiP participants.