

30 August 2018 by Bryan Johnston

A schedule of 'early suggested changes' to the new London Plan was issued by the Greater London Authority (GLA) earlier this month, ahead of a formal public examination expected to start in January. Here are four of the key changes proposed, with reaction from commentators.



City Hall: emerging London Plan changes published by GLA

1. Major development proposals will need to show how carbon emissions can be curbed over their entire lifetimes. The suggested changes include a requirement that developments referable to the mayor should be accompanied by a "whole-life cycle carbon assessment" and proposed actions to reduce emissions through a "nationally recognised" process. The modified plan says that this approach should capture unregulated emissions not covered by the Building Regulations, "embodied" emissions from raw materials extraction, manufacture and transport of construction materials, and emissions associated with maintenance and waste disposal. Referable schemes include proposals for 150 homes or more, higher than 30 metres outside the City of London and on green belt or metropolitan open land. The revisions say developers of major schemes

below these thresholds should still "calculate unregulated emissions and are encouraged to undertake whole life-cycle assessments".

Bidwells planning associate Jonathan Bainbridge said: "It's very difficult to predict how technology will change and buildings will evolve, so this requirement could add to the cost and risk of development." Sherleen Pang, an associate at sustainable design consultancy XCO2, said: "It would need a clear framework from the GLA, because there are different methods. A standard method, perhaps set out in supplementary planning guidance, and a database of information for developers would streamline the process."

2. Design review requirements would be strengthened under the suggested changes. A modified section on design scrutiny says that design "should be thoroughly scrutinised by borough planning, urban design, and conservation officers". It goes on to include further detail on the recommended design review process, including referring applicants to the referring applicants to the mayor's design principles document, the London Quality Review Charter.

Place Alliance chair Professor Matthew Carmona said the changes echo the stronger emphasis on the design in the revised National Planning Policy Framework. "But we should be under no illusion that delivery of place quality will be dependent on having the right design skills available in-house within local authorities. On this front, London, in common with the rest of the country, has a long way to go." Sara Parkinson, London planning lead at regeneration specialists Galliford Try Partnerships, said: "It is really helpful that the mayor has clarified the situation on design review and is seeking to make sure this concentrates on principles and doesn't become a lengthy debate on details."

3. The draft plan's call for boroughs to apply a presumption in favour of small housing developments of up to 25 homes has been elaborated. A new footnote clarifies that the presumption would apply in areas up to 800 metres "from the edge of" town centre boundaries. The changes indicate that the presumption in favour of new-build homes would not apply in conservation areas, although it would still apply to conversions. Instead, they urge boroughs to "explore opportunities" for small housing developments in conservation areas or heritage settings "where these will complement and enhance the area". They also confirm that the presumption would not apply to areas including designated industrial or employment sites, green belt and metropolitan open land, to buildings over 30 metres high or to projects that "demonstrably fail to optimise housing delivery" on a site.

London Forum of Civic and Amenity Societies spokesman Michael Bach said that extending the small sites policy to areas up to 800 metres from town centre boundaries is too generous. "Many of London's centres are long and straggling. It would be more appropriate to relate the distance to the core of the centre where most of the facilities are concentrated." Bainbridge said: "Everyone wants to see small sites come forward, but they are incredibly challenging to deliver because so many existing residents are affected."

4. Affordable housing requirements from residential schemes on industrial land could be relaxed if replacement industrial space is provided. The changes set out the mayor's expectation that residential proposals on industrial land should deliver at least 50 per cent affordable housing, but only "where the scheme would result in a net loss of industrial capacity".

Parkinson said this amendment could encourage developers to look for ways of incorporating employment space into mixed-use projects. "But it will be a challenge because this is largely untested in the London market."

Six other significant changes

1. The document revises London's population growth to 2041 upwards, from 10.5 million to 10.8 million residents in 2014, but the estimated annual requirement for new homes remains pegged at 66,000 up to 2029.
2. The modifications acknowledge publication of the government's standard method for calculating housing need, set out in July's revised National Planning Policy Framework, but assert that it appeared too late to be incorporated into the evidence base for the new plan, which relies on a strategic housing market assessment produced last year.
3. The changes state that all major development proposals "must be at least air quality neutral and be submitted with an air quality assessment". The December draft said developers could avoid this requirement by showing that emissions will be "less than the previous or existing use".
4. The changes give more recognition of the role of neighbourhood planning. They refer to a "three-tier" planning system working at the regional, local and neighbourhood levels across London, include support for neighbourhood planning among the London Plan's purposes, and add neighbourhood forums to the list of bodies that may be included in partnership approaches to town centre improvements.
5. Site-specific infrastructure assessments will be required for developments with capacities exceeding those allocated in development plans. Proposed changes say assessments should establish what additional impact the scheme will have on current and planned infrastructure and how this can be appropriately mitigated either on-site or off-site, having regard to the Community Infrastructure Levy proceeds generated.
6. The changes place increased emphasis on the need for a diversity of housing providers and approaches to delivery, including Build to Rent, community-led housing and self and custom-build housing.

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