

<b>Item No.</b>	<b>Classification:</b> Open	<b>Date:</b> Jul 21 2009	<b>Meeting Name:</b> Executive
<b>Report title:</b>		Response to 'A new plan for London. Proposals for the Mayor's London Plan.'	
<b>Ward(s) or groups affected:</b>		All	
<b>From:</b>		Strategic Director of Regeneration and Neighbourhoods	

## RECOMMENDATIONS

1. That members agree the council's formal response to "A new plan for London. Proposals for the Mayor's London Plan" as set out in appendix A.

## BACKGROUND INFORMATION

2. The Mayor of London is consulting on a new London Plan. This will form part of the development plan for Southwark.
3. First stage of the public consultation on the document took place last year and Southwark Council gave a response on November 20 to the Greater London Authority.
4. The Mayor is now at the second stage of consultation before holding a public examination of the new London Plan in summer / autumn 2010.

## KEY ISSUES

5. We generally welcome the more strategic approach to planning guidance at a London level rather than providing detailed prescription that would be more appropriate in borough plans. There were a number of issues that the Mayor set out for comment. These include:
6. London's places, the main issues are concerning:
  - detail of policy to be included in the London plan and Southwark plan,
  - a new inner London policy area
  - revisions to the town centres network and strategic industrial locations.
7. London's people, the main issues are concerning:
  - affordable housing targets and policy requirements,
  - intermediate housing mechanisms for provision,
  - family housing,
  - density,
  - provision for Gypsies and travellers,
  - space standards,
  - provision of social infrastructure
8. London's economy, the main issues are concerning:
  - giving Londoner's the skills they need to gain employment,
  - innovation and green technology.
9. Climate change, the main issues are concerning:

- whether existing policies for sustainable energy could be improved,
- challenges for renewable energy,
- preference for onsite over offsite renewable energy in new development,
- financial contributions for sustainable energy,
- over heating, cooling, green space and living roofs,
- waste management.

10. London's transport, the main issues are concerning:

- boosting public transport within financial constraints,
- an approach for cycling and walking,
- a new approach to road schemes.

11. London's quality of life, the main issues are concerning:

- where tall buildings should be built,
- how to protect open spaces,
- reuse of burial spaces,
- lifetime neighbourhoods

12. Implementation, monitoring and review:

- an infrastructure implementation plan for London,
- prioritising section 106.

13. Consultation with planning committee took place on June 9 2009. The comments are provided for consideration by executive in the table below:

WHOSE COMMENT	CHANGE SUGGESTED BY PLANNING COMMITTEE, MEMBERS OR OFFICERS	COMMENT	EXECUTIVE YES OR NO TO CHANGE
Planning Committee	<p><b>Chapter 3</b> <b>London's people</b></p> <p>Our response should include the following comments: "While we welcome the approach of agreeing numeric targets for provision of affordable housing rather than a blanket percentage requirement of 50%, we are concerned that the targets should be agreed fairly across London so that the objective of developing sustainable balanced neighbourhoods can be achieved. To this end, the target for boroughs such as Southwark should take into account the over-dominance of social housing in certain areas and should require provision of new affordable housing in areas which</p>	This would support the approach in the core strategy.	

WHOSE COMMENT	CHANGE SUGGESTED BY PLANNING COMMITTEE, MEMBERS OR OFFICERS	COMMENT	EXECUTIVE YES OR NO TO CHANGE
	currently have low levels such as in many of the outer London boroughs.'		
	<p><b>Chapter 3 London's people</b></p> <p>'The London Plan should make it clear that, while the boroughs may be set numeric targets for social housing, their policies contained in their local development frameworks should include requirements for a certain proportion of affordable housing which may vary as appropriate between different areas. This would avoid a situation that could arise where a developer claims that it is not necessary to provide affordable housing on their site because the borough's target will easily be reached if other sites provide the necessary affordable housing in the future.'</p>	This would support the approach in the core strategy.	
	<p><b>Chapter 3 London's people</b></p> <p>The reference to rooms sizes should refer to student accommodation and <u>hostels</u> (not hotels).</p>	It should include hostels as well as hotels as room sizes are an issue for all of these housing types.	
Planning Committee	<p><b>Chapter 5 London's response to climate change</b></p> <p>The Mayor should be urged to develop London-wide policies on energy efficiency and promotion of microgeneration in the existing building stock.</p>	This would be supported to improve energy infrastructure in Southwark.	

WHOSE COMMENT	CHANGE SUGGESTED BY PLANNING COMMITTEE, MEMBERS OR OFFICERS	COMMENT	EXECUTIVE YES OR NO TO CHANGE
Planning Committee	<p>Our response should include the following comments:</p> <p>'Southwark has demonstrated its support for the policy of moving towards fewer, larger waste sites by proposing the integrated waste management facility on Old Kent Road which will enable the borough to make a substantial contribution London's waste needs. The London Plan needs to acknowledge this and take full account of the need to remove smaller, inefficient waste sites where they are causing serious environmental hazards and impeding regeneration of areas in need of regeneration such as opportunity areas as is the case with the Manor Place waste site at Elephant and Castle.'</p>	<p>This would be supported to improve waste infrastructure whilst enabling regeneration of areas.</p>	
Planning Committee	<p><b>Chapter 6 London's transport</b></p> <p>The comments regarding the Cross River Tram should not refer to the prospect of removing the proposal from our local development framework but should urge the Mayor to support the proposal or replace it with another suitable proposal to improve accessibility in poorly served areas such as Walworth and Peckham. In doing so, the Mayor should promote the extension of the Bakerloo Line into these areas.</p>	<p>We can not put proposals in the core strategy that can not be implemented. The tram does not have an implementation plan by TfL so can not be in the core strategy. We can put in the Bakerloo line as an aspiration.</p>	

<b>WHOSE COMMENT</b>	<b>CHANGE SUGGESTED BY PLANNING COMMITTEE, MEMBERS OR OFFICERS</b>	<b>COMMENT</b>	<b>EXECUTIVE YES OR NO TO CHANGE</b>
Officer	<p><b>Chapter 6 London's transport</b></p> <p>A number of detailed studies have already shown that an area based approach to providing low carbon energy supplies is more effective (both financially and technically) than taking an individual building or site approach. The London First report on delivering decentralised energy across London also highlighted that larger scale CHP/district heating (and cooling) is going to be more cost effective than individual site based schemes.</p>	<p>A number of detailed studies have already shown that an area based approach to providing low carbon energy supplies is more effective (both financially and technically) than taking an individual building or site approach, particularly when combined with local electricity generation. Such an approach has been instrumental in delivering the aspirations for a carbon neutral regeneration of Elephant and Castle. The London First report on delivering decentralised energy across London also highlighted that larger scale CHP/district heating (and cooling) is going to be more cost effective than individual site based schemes.</p>	
	<p><b>Chapter 6 London's transport</b></p> <p>The opportunity should be taken to restate our position on the Crossrail tariff - that it should not apply in areas that are in need of regeneration, that aspire to become part of central London, where there will be little benefit from the project and where other transport investment is seriously needed as is the case with Elephant and Castle.</p>	<p>We could add this into the response.</p>	
	<p><b>Chapter 6 London's transport</b></p> <p>We would strongly recommend that the Mayor takes up many of the recommendations of the</p>	<p>We would strongly recommend that the Mayor takes up many of the recommendations of the</p>	

WHOSE COMMENT	CHANGE SUGGESTED BY PLANNING COMMITTEE, MEMBERS OR OFFICERS	COMMENT	EXECUTIVE YES OR NO TO CHANGE
	<p>London First study, particularly the need for a strategic approach to planning heat networks across London. There is a strong case for designating specific areas across London as recommended for district heating (dense, mixed use) and adopting a different approach for the renewables requirement.</p>	<p>London First study, particularly the need for a strategic approach to planning heat networks across London. There is a strong case for designating specific areas across London as recommended for district heating (dense, mixed use) and adopting a different approach for the renewables requirement. This also links with the PPS1 requirement for identifying locations suitable for sustainable energy generation.</p>	
	<p><b>Chapter 6 London's transport</b></p> <p>Where district heating is prioritised developers should be discouraged from meeting renewables requirements with onsite heat producing renewable energy systems. However, it is also clear that for such dense mixed use areas meeting onsite renewables targets via electricity producing renewables would be challenging - both technically and financially (roof area for PV and wind resources both being limited). In this case there is a good case for introducing financial contribution for energy infrastructure investment. In non-district heating designated areas, where renewables targets cannot be met, financial contribution could be ring-fenced for onsite renewable energy investment.</p>	<p>Where district heating is prioritised developers should be discouraged from meeting renewables requirements by using onsite heat producing renewable energy systems. However, it is also clear that while we should be challenging developers to deliver on targets for renewable energy provision, in such a dense mixed use area like Southwark there will be cases where meeting renewables targets via on-site electricity producing renewables would be challenging - both technically and financially (suitable roof area for PV and wind resources both being limited). In this case there is a good case for introducing financial contribution for energy infrastructure investment. In non-district heating designated areas, where renewables targets cannot be met, financial contribution could be ring-fenced for other</p>	

WHOSE COMMENT	CHANGE SUGGESTED BY PLANNING COMMITTEE, MEMBERS OR OFFICERS	COMMENT	EXECUTIVE YES OR NO TO CHANGE
		renewable energy investment in the local area.	
	<p><b>Chapter 6</b> <b>London's transport</b></p> <p>The route map to zero carbon homes in 2016 progressively eliminates heat demand from buildings (via increasing levels of insulation). However, the growing demand following occupation of buildings is for electricity for appliance use. The step from Code for Sustainable Homes level 5 to 6 requires that all electricity use is provided by zero carbon sources. This is a challenge for urban areas where the electricity producing renewables are limited (roofspace for PV, low wind resources). In urban areas, the most cost efficiency technology for producing zero carbon electricity is biomass CHP. However, electrical output from CHP will be limited by the low demand for heat the development - in many cases it would be necessary to export heat to neighbouring existing buildings. Establishing such heat exports will be complex for developers to arrange. While this is not a subject for planning, the Mayor should develop mechanisms etc. to make it simpler for developers to establish heat export arrangements to existing buildings.</p>	<p>The route map to zero carbon homes in 2016 progressively eliminates heat demand from buildings (via increasing levels of insulation). However, the growing demand following occupation of buildings is for electricity for appliance use. The step from Code for Sustainable Homes level 5 to 6 requires that all electricity use is provided by zero carbon sources. This is a challenge for urban areas where the electricity producing renewables are limited (roofspace for PV, low wind resources). In urban areas, the most cost efficiency technology for producing zero carbon electricity is biomass CHP. However, electrical output from CHP will be limited by the low demand for heat from the development - in many cases it would be necessary to export heat to neighbouring existing buildings. Establishing such heat exports will be complex for developers to arrange. While this is not a subject for planning, the Mayor should develop mechanisms etc. to make it simpler for developers to establish heat export arrangements to existing buildings.</p>	

## Resource/Financial Implications

14. None at this stage.

## Community Impact Statement

15. There are no implications arising from the response at this time.

## SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

### Strategic Director of Communities Law and Governance

16. Members are requested to consider and comment upon the council's proposed response to "A new plan for London. Proposals for the Mayor's London Plan" as set out in appendix A of the report.
17. Under paragraph 10, Part 3F of the Southwark Constitution headed 'Planning Committee', it is the function of the planning committee on national and regional consultation documents proposing significant changes to strategic planning policies (e.g. London Plan) and make recommendations on the council's response to the executive, as appropriate.
18. The approval of responses to consultation documents from the Greater London Authority and other bodies relating to significant changes affecting a particular portfolio area which would not require changes to the budget and policy framework is ordinarily delegated to the Individual Executive Member (IDM) for the relevant area, in the instant case, Cllr Noblet (executive member for regeneration and neighbourhoods) (paragraph 13, Part 3D). However, where such consultation departments have the prospect of affecting more one portfolio, the matter is referred to a meeting of the executive (Introduction to Part 3D). In this instance it is deemed that the consultation in respect of "A new plan for London. Proposals for the Mayor's London Plan" is likely to raise cross-cutting issues for different portfolio areas, for instance for the regeneration and neighbourhoods, environment and housing portfolios.
19. In the circumstances, it is deemed appropriate to refer the council's response to the consultation documents for comment and approval by full executive following comments by members of the planning committee.

## BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
London Plan	Planning Policy Team 5 <sup>th</sup> Floor, Tooley Street	Tim Cutts 020 7525 5380
Southwark Statement of Community Involvement	Planning Policy Team 5 <sup>th</sup> Floor, Tooley Street	Tim Cutts 020 7525 5380
Southwark Local Development Scheme	Planning Policy Team 5 <sup>th</sup> Floor, Tooley Street	Tim Cutts 020 7525 5380
Southwark Plan 2007	Planning Policy Team 5 <sup>th</sup> Floor, Tooley Street	Tim Cutts 020 7525 5380

## APPENDICES

No.	Title
Appendix A	Response to the London Plan

## AUDIT TRAIL

<b>Lead Officer</b>	Anne Lippitt, Strategic Director of Regeneration and Neighbourhoods	
<b>Report Author</b>	Julie Seymour, Head of Planning Policy	
<b>Version</b>	Final	
<b>Dated</b>	Jul 10 2009	
<b>Key Decision?</b>	No	
<b>CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / EXECUTIVE MEMBER</b>		
<b>Officer Title</b>	<b>Comments Sought</b>	<b>Comments included</b>
Strategic Director of Communities, Law & Governance	Yes	Yes
Executive Member	Yes	No
<b>Date final report sent to Constitutional Support Services</b>	July 10 2009	