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## DEPARTMENT OF GEOGRAPHY & ENVIRONMENT

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### RE: Comments on the Draft London Plan

#### The flight from strategic responsibility

The new draft of the London plan claims to be a new animal, distinctive from the last, being shorter, easier to navigate and, importantly, more strategic in nature (p. 10). It is undoubtedly shorter having shed around 140 pages from its last incarnation. Some may find its structure to be more intelligible though that was not our experience, for example we found it very difficult to identifying specific policy sets on sustainable development. We also searched for a clear statement on the major strategic approach. Although 'strategy' is included in the title of Chapter 1 (Context and Strategy) this turned out to be more context than strategy with a short statement of strategic objectives at the end. The first section of Chapter 2 is entitled 'spatial strategy' however this was only a vague statement along the lines of 'all parts of London have a contribution to play'. We found the previous plan with its logical sequence from broad strategy through to details a much clearer presentation. However most worryingly, is the claim that the plan is more strategic.

There are a number of ways that the plan falls short of this more strategic goal. The first is in the manner in which it deals with the concept of sustainability, which is a statutory consideration for the Greater London Authority. In the current plan, sustainability is set out under the broad development strategy and is further developed by policy 2A.1 through a set of criteria that the Mayor is to use for developing sub-regional policy, and when considering local planning policy and planning applications that are referred to him.

The current plan goes on to stress in paragraph 2.7 and I quote "that sustainable development runs throughout the London Plan and all its policies, starting from the Mayor's vision and objectives". Here again the Plan is stating up front, early on and firmly that sustainability needs to be considered and it is giving us a set of criteria by which to judge its performance. The new draft plan does nothing like this; there is no coherent structuring element to bind together policies that balance society, economy and the environment. By not addressing and defining sustainability in some fashion early on the draft Plan arguably lacks strength where sustainability is concerned.

As already said we found it difficult to identify the location in the Plan where the key strategic policies are set out. After a search we have reached the conclusion that they may not exist. A question is raised here about the nature of the Plan and its statutory requirement as a strategic document. This draft is heavy on pragmatism, localism and decentralisation to Boroughs. What is left of a strategic nature and does this fulfil its statutory duty? The emphasis on the Outer Boroughs might have provided a new strategic approach but this policy is mainly rhetoric and does not add up to much in concrete policy terms. Key strategic decisions such as Cross Rail and the Olympics have been continued from the past. However these are programmed for the early years of the plan. There are no strategic policies or investment priorities set out for the rest of the period to 2031 (although a few possibilities for investigation are mentioned e.g. new bridge). The watering down of the affordable housing requirements with more Borough control is another example of the withdrawal from a strategic responsibility.

Finally, there is an issue regarding the new relationship the Mayor pledges to build with the Boroughs. This is best illustrated in paragraph 1.43 of the new plan which states that "The Mayor intends to take a new, more consensual approach to planning for London..." and then it continues that "This will focus more on delivery of agreed and shared objectives, less on process or structure." This shift has been conceptualised as a move towards a more decentralised metropolitan style of government or a more local and pragmatic approach. To some this may prove a welcome shift of power to local Boroughs, however it in no way represents a more strategic approach to planning and could easily lead to piecemeal planning and lack of a common approach for London as a whole. In our view the Mayor of London was established in order to provide leadership for London and make the bold decisions needed on strategic matters.

Yours sincerely,

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