

London Assembly Plenary – 06.02.15
Amendment to Chair’s Procedural Motion (Agenda item 3, Part B)

Mover: Nicky Gavron AM

Seconded: Jenny Jones AM and Stephen Knight AM

Following “That the Assembly notes the answers to the questions asked”, insert:

“This Assembly has serious concerns about a number of the new and altered policies in the Further Alterations to the London Plan, including those addressed below.

“Housing Supply

“This Assembly notes with disappointment that the Further Alterations to the London Plan’s (FALP) annual housing target fails to meet the need identified by the Mayor’s own evidence base. The annual housing target of 42,000 falls short of the annual need of 49,000-62,000 identified by the evidence, thereby failing to satisfy the National Planning Policy Framework (NPPF) requirement to fully meet objectively assessed local housing need¹. Moreover, the FALP fails to give strategic direction to the boroughs on how to make up this gap.

“The FALP tenure split target – which gives a numerical target of 17,000 affordable homes per year² – falls significantly below London’s needs and threatens to undermine the prospect of socially and economically mixed communities. The Mayor’s evidence base, the London Strategic Housing Market Assessment (SHMA), is clear that 52% of all new dwellings must be affordable housing in order to meet demand in the capital³.

“Opportunity Areas

“This Assembly welcomes the 35,000 homes and 60,000 jobs that the capital’s new Opportunity Areas have the potential to create. However, we are concerned by the lack of progress that has been achieved on a significant number of the existing Opportunity Areas⁴. Designation as an Opportunity Area should not automatically mean tall buildings are allowed, and we note that the independent planning inspector indicates that high densities can be achieved without high rise. This Assembly is also concerned that prioritising housing over employment, as suggested in FALP paragraph 2.62⁵, undermines the concept of Opportunity Areas as becoming sustainable communities providing not just places to live but local jobs, retail, and services for residents.

“Town Centres

“This Assembly welcomes the changes to the town centres policy proposed in the FALP – specifically the potential for increased housing density and the benefits that this will bring to the business community and social life of the capital’s struggling high streets. However, this Assembly is concerned that major and district centres will be undermined if the policy is not implemented along with complementary measures to revitalise the town centres.

¹ National Planning Policy Framework, paragraph 47.

² FALP Policy 3.11.

³ SHMA Table 19.

⁴ GLA website, [Location of London's Opportunity and Intensification Areas](#).

⁵ FALP paragraph 2.62 directs that “employment allocations should not fossilise housing potential.”

“Industrial Land Use

“This Assembly is concerned that the release of industrial land poses a serious threat to London’s future economic growth. Forfeiting too much of our industrial land will lock London into a post-industrial state too dependent on shock-susceptible financial and business services. If London is to develop an industrial base, such as in the secondary materials economy or clean-tech and increasingly logistics, it must provide the land for these types of firms to emerge.

“Open Space

“This Assembly notes with concern that Policy 2.18 Green Infrastructure: The Multifunctional Network of Green Spaces has been weakened so that there is no longer a requirement to meet deficiency in open space. This is particularly worrying as open spaces are coming under huge development pressure.

“Exposure to Air Pollution

“This Assembly notes that Policy 7.14 Improving Air Quality provides the basis for the Mayor to address air pollution in development applications through seeking to “minimise increased exposure to existing poor air quality”.⁶

“However, the alterations proposed do not put sufficiently strong barriers in place to protect the most vulnerable. For example, it may still be possible for a new school to open on a very highly polluted road, when a less polluting site is available. The same could apply to the elderly and unwell.

“Waste

“This Assembly welcomes bringing forward the target date for managing all of London’s waste within London. However, we are concerned that the waste management policies will make this nearly impossible without relying on new and replacement incineration facilities, which would crowd out recycling and the development of the secondary materials economy. We note with concern that the threshold set for the new carbon intensity floor would allow such facilities to be given planning permission.

“Lifetime Homes

“This Assembly notes the alterations relating to Londoners who require accessible or adapted housing, and celebrates the commitment in the London Plan under successive Mayors in ensuring that London is a beacon of best practice across the UK in building new homes to Lifetime Home Standards or to be wheelchair accessible or adaptable.

“This Assembly is concerned that the Deregulation Bill may strip the Mayor and boroughs of the power to include lifetime home requirements without additional evidence of need, and may remove the power of the Mayor and boroughs to require private developers to include wheelchair accessible properties.

⁶ FALP Policy 7.14.

“Changes Required

In light of the concerns raised above, this Assembly calls on the Mayor, under Section 60 (1) of the Greater London Authority Act 1999 (as amended), to:

- **Housing Supply:**

1. Revise the FALP’s annual housing target upwards – from 42,000 to 49,000 – in accordance with the minimum level of demand determined by the SHMA and in order to ensure that the revised London Plan is compliant with the NPPF.
2. Uprate the tenure split on new developments from a numerical target of 17,000 to a percentage target of 52% of all new dwellings, in order to meet the level of demand determined by the SHMA.

- **Opportunity Areas:**

1. Introduce a Key Performance Indicator to ensure Opportunity Areas are provided with timely planning frameworks developed with genuine community consultation.
2. Revise FALP paragraph 2.62, to reflect the fact that Opportunity Areas should help form sustainable communities. They should provide higher than existing levels of affordable housing and more employment opportunities for local people, as well as retail and services for residents.

- **Town Centres:**

1. Revise the FALP to make it explicit that opportunities for high-density residential development should only be pursued where these will contribute to the revitalisation of town centres.

- **Industrial Land Use:**

1. Define “surplus” in FALP paragraph 2.85 to make clear that industrial land should not be considered surplus so long as there remains the potential for that site to be used for industrial purpose and only where effort has been made to make the land viable for a wide range of industrial uses.

- **Open Space**

1. Changes to Policy 2.18 should be reversed so that deficiencies in open space must be met.

- **Exposure to Air Pollution:**

1. Strengthen the air quality provisions currently included in the London Plan, strongly discouraging the provision of new schools, care homes or health clinics near existing air pollution hotspots when a less polluted site is available, as recommended by the House of Commons Environmental Audit Committee in its recent report 'Action on Air Quality'

- **Waste**

1. The recycling targets must be increased in order to realistically achieve the target of managing all of London's waste within London. London has too much incineration capacity for its future waste arising and therefore incineration capacity should be reduced as older facilities go offline. The carbon intensity floor threshold must be decreased now to rule out all new and/or replacement incineration facilities under this London Plan. There is already too much incineration capacity in the capital; for example, Defra figures show that 42% of municipal waste was incinerated in 2013-14, while para 5.70 of the FALP states that 85 per cent of household waste is recyclable."

- **Lifetime Homes:**

1. Lobby the Government to remove from the Deregulation Bill provisions that may strip the Mayor and boroughs of the power to include lifetime home requirements without additional evidence of need, and/or remove the power of the Mayor and boroughs to require private developers to include wheelchair accessible properties."