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FOR LONDON

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30<sup>th</sup> June 2009

Dear Mr Johnson,

**A New Plan for London: Proposals for the Mayor's London Plan**

I welcome the opportunity to comment on the proposals for a new London Plan, published for consultation with the London Assembly and Functional Bodies. Government Office for London is responding on behalf of Government.

The proposals document, *A New Plan for London*, provides a broad overview of proposals for a new Spatial Development Strategy (SDS), which has also become known as the London Plan. As such it is not our intention to give comprehensive comments on all of the proposals outlined in the document as the detail of policy content is yet to emerge. However, we will be interested to see how the proposals outlined in this document are taken forward into draft policies.

We have focussed our comments on a number of key issues. We would welcome the opportunity to continue to explore the detail of policy with the GLA as it develops. For ease of reference we make some general comments on the proposals below and then on a number of key issues. We also include an appendix with some more detailed points for consideration and information which may be of use as you develop your policies.

**General Comments**

**1. Reviewing the Strategy** - We welcome the approach to fully revise the Strategy at this time and recognise that this will address the requirement that it be kept under review. It also helps in addressing the concerns raised by the Panel at the Examination into the draft Further Alterations that a full review,

allowing the underlying principles of the SDS to be debated, is preferable to another round of Alterations.

**2. Legislative requirements** - You have outlined some of the legislative requirements for the Strategy in the proposals document, in particular the general duties of the Mayor (economic, social and environmental), the principle that there should be equality of opportunity for all people and a number of other issues to which the Mayor should have regard (namely reducing health inequality, climate change, achieving sustainable development, promoting use of the Thames and international treaty obligations as notified by government). Paragraph 2.7 of GOL Circular 1/2008 outlines that the Mayor should also have regard to:

- the need to ensure consistency with national policies [and with such international obligations as notified by the Secretary of State<sup>1</sup>];
- the need to ensure consistency between the strategies prepared by the Mayor; and
- the resources available to implement the strategy.

**3. Consistency with government policies** – It will be important to ensure that the Strategy has regard to the need to ensure consistency with national policies. Further detail is provided in GOL Circular 1/2008. These are defined as policies available in written form that have been laid, presented or announced in Parliament or published by a Government minister. This would include, in particular, Planning Policy Guidance notes (PPGs) and Planning Policy Statements (PPSs), relevant circulars and other qualifying statements of planning policy.

**4. Spatial approach** - The intention to provide a strong spatial emphasis is welcomed, particularly through a new primary chapter on London's Places. GOL Circular 1/2008 emphasises that "the SDS must continue to include the Mayor's general policies for the development and use of land in London, but it should also incorporate the spatial - that is, geographical and locational (though not site specific) - elements of transport, economic development, environmental and other strategic policies for London, bringing them together in a single, comprehensive framework". How are you proposing to take forward the spatial approach throughout the other chapters of the strategy?

**5. Employment and population projections** - The document sets out some key projections for population and employment growth as context and a basis for the proposals which follow. We understand that you are working closely with neighbouring regions in confirming these projections and would be particularly interested to understand the outcomes of this exercise (including how this relates to the Interregional Forum research on Approaches to Growth).

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<sup>1</sup> This would include all such international obligations which apply to London and the Mayor

6. We also welcome the approach being taken to considering the Spatial Development, Economic Development and Transport Strategies together and look forward to seeing how the relationship between them is brought forward in the consultation drafts.

7. Regarding Employment Projections, you have outlined the projected growth up to 2031. These projections are substantially lower (650,000 jobs 2011-2031) than those set out in the previous London Plan (900,000 jobs 2007-2026). You indicate that this is work in progress; however we would like to understand better the reasons for such a significant reduction in projected employment growth, and the increased mismatch between overall population growth and employment growth (with population growth increasing from 0.69-1.14 million (2006-26) to 0.99-1.2 million (2011-31) whilst employment growth projections reduce). What are the implications of the lower projected employment growth on population growth, transport and housing requirements (including the need for affordable housing), the distribution of this across London, as well as other economic, social and environmental impacts?

8. Regarding population projections, your current projections are based on the 2004-based household projections, applied to the 2006-based population projections. What difference would the use of more up-to-date 2006-based household projections make?

9. More broadly, how are you proposing to consider the relationships between the models you are using? What, for example, would be the implications of changes in economic projections on your models for population, transport and environment or the implications of changes to population projections on housing needs and employment? Would there be implications for the distribution of growth?

#### Issues related to housing

8. Your proposals set out that the Strategy will “seek to maximise the output of housing supply across the region, to increase the numbers of affordable homes built, and to promote quality outcomes so that the homes that are built meet the needs and aspirations of Londoners”. These general aims are welcomed. However, it will be necessary to carefully consider how the detail of policy, as it emerges, addresses these and meet government policy (set out in PPS3: Housing), in particular a wide choice of high quality homes, widening opportunities for home ownership, improving affordability by increasing supply, and creating sustainable, inclusive, mixed communities.

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9. **Housing supply** – We welcome the work being undertaken on a new Strategic Housing Land Availability Assessment and will continue to engage closely with you as this progresses. We support the collaborative approach to taking forward assessment of land availability for housing and stress the importance of continued engagement with key stakeholders, including home builders. PPS3: Housing (in particular paragraphs 33-34) sets out in detail matters which should be taken into account in determining the level of housing provision for the region.

10. In your proposals document you refer, at paragraph 104, to addressing the growing shortage of affordable housing. You will be aware that PPS3 sets out that

government policy is also to address the affordability of housing more generally, by increasing supply, not only increasing affordable housing. At paragraph 105, you refer to the NHPAU advice on housing supply ranges. We welcome the reference to testing the supply ranges.

**11. Affordable housing targets** – You have outlined your proposals on targets for affordable housing, in particular removal of the 50% target currently referred to in Policy 3A.9 of the London Plan. PPS3 sets out the requirements for the Strategy, including setting out the affordable housing target for the region. While this need not necessarily be a percentage target, it should cover the plan period. You will want to consider the best way for the Strategy to make clear how the target will be implemented.

**12. Relationship between SDS targets, Housing Strategy targets and borough LDF targets** - We are not clear, from the proposals as currently worded, how it is envisaged the long-term numerical target in the SDS will relate to any short-term targets in the emerging Housing Strategy, or how the SDS target will be taken forward by boroughs in their Local Development Frameworks. In particular, the proposal that this target *“will be delivered through local targets that will be derived collaboratively with boroughs outside the planning system reflecting their local circumstances”*, as currently proposed, could be seen as contrary to PPS3<sup>2</sup>, which makes clear that the LDF process is the appropriate mechanism for setting borough-level targets.

**13.** How will any targets set outside the planning system assist in borough plan making and how will they relate to the new 20-year target in the SDS? How will they relate to broader Plan priorities on, for example, mixed and balanced communities or viability? We would like to explore with you in more detail, at the earliest opportunity, how this would work.

**14.** How will the proposed numerical target inform negotiations on individual sites (where a percentage target will no longer be available as a benchmark against which to assess relative contribution to an overall target)?

**15. Types of affordable housing** - You refer to different types of housing and affordable housing in the proposals, including reference to “more intermediate options”. We are not clear what this means in practice or how it relates to the delivery of more intermediate housing (in light of the findings of the Strategic Housing Market Assessment) or proposals in the Mayor’s Housing Strategy which are currently being discussed with government and not yet finalised. This may not be an issue which is for the Spatial Development Strategy to deal with, and may be more appropriately left to the Housing Strategy. PPS3 and accompanying guidance set out the definition of affordable housing, including social and intermediate housing.

**16. Housing quality** – Achieving high quality housing is an important government aim and we welcome the emphasis on promoting high quality urban environments in your proposals. We note that you are proposing to extend the

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<sup>2</sup> As set out in PPS 3, in particular paragraph 29 which makes clear that the planning system is the appropriate mechanism for setting affordable housing targets by borough, and sets out the factors to be taken into account.

expectations in the developing Housing Design Guide, as a general principle, to all sectors. We also note that this may include space standards for private sector stock. This could potentially raise issues for national policy which we will need to consider as the detail of any proposed policy emerges. Nevertheless, it will be important for any developing Strategy approach to be fully justified through a robust evidence base in terms of both the need for, and details of, any requirements proposed. The implications of introducing any such standards will also need to be considered in detail, in particular the impact on housing output and viability, and the implications for other policy proposals, such as affordable housing provision.

**17.** You may want to consider whether other regulatory regimes provide a more appropriate basis for introducing any requirements. A range of guidance on design currently exists. It will be essential to ensure complementarity with other standards, such as those being introduced through the Homes and Communities Agency, and, in particular, the relationship with requirements in the Code for Sustainable Homes which are being introduced. We would welcome early engagement to understand how any proposed policy would work and fit with government priorities on housing.

**18.** We also note that you propose to give greater recognition to the contribution of back gardens to broader strategic objectives and introduce a presumption against their loss. You will be aware that a government review on this issue is underway. We will be interested to see details of your proposals as they emerge.

**19. Gypsy and Traveller Accommodation** – We welcome your proposal to address site provision and include borough-level pitch targets for Gypsy and Traveller Accommodation. We understand that you are currently engaged with the Gypsy and Traveller community and would encourage you to ensure proactive engagement continues. It will be important to address all the relevant requirements as required in ODPM Circular 1/2006 (addressing the full level of need for residential and transit pitches), and CLG Circular 4/2007 'Planning for Travelling Showpeople'. We will be interested to see details of your proposals as they emerge.

**20. Strategic housing market assessment:** As we understand it, the 2008 London Strategic Housing Market Assessment (April 2009) is intended to inform both the Mayor's Housing and Spatial Development strategies. The modelling projections in this assessment relate to the ten year period April 2007 to March 2017. The revised London Plan period will be from 2011 to 2031. Communities and Local Government SHMA practice guidance (August 2007), page 61, indicates that SHMAs should "provide a robust basis for developing housing and planning policies by considering current and future housing need and demand over a period of at least 20 years." We would be interested in your thoughts on our observation that there only appears to be robust and credible London-wide evidence on housing need and demand from the SHMA for the first six years of the revised London Plan period.

#### Issues related to Climate Change

**21.** We are encouraged to see the continued significance and priority being given to tackling climate change and the need to move to more sustainable ways of

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supplying energy. London has been a leader in this field and we hope that the new SDS will ensure this continues. It is particularly important for the SDS to set out what expectations are expected from the spatial planning system, alongside other regulatory regimes (such as building control), and that climate change is a key and integrating theme in the Strategy.

22. Adaptation and mitigation should be considered together in the Strategy, creating places where people can live in a way which helps to reduce emissions contributing to climate change, and are also resilient to its effects. Building on the positive work already done on the effects of a changing climate in London, your use of the UK Climate Projections 2009 and consideration of their impacts for London is welcomed.

23. **Carbon reduction targets** - The government has set clear and challenging targets and duties on itself, and local and regional authorities through the Climate Change Act 2008, Energy Act 2008 and Planning Act 2008. For the first time we now have in statute national targets, reported on in five-yearly carbon budgets, for the UK on carbon emission reduction and renewable energy generation.

24. We welcome the ambitious targets being set to reduce CO<sub>2</sub> emissions by 2025 and look forward to seeing further detail on the range of policies that will support these. Targets should be based on realistic assumptions about what is achievable. PPS1 Supplement sets out requirements for the SDS (see paragraphs 12 and 13 in particular). PPS 1 Supplement (Planning and Climate Change) places particular emphasis on evidence based policies and the need to have a broad understanding of the opportunities and constraints faced by the region. We would welcome continued engagement with you on your emerging evidence base.

25. We also welcome the aspiration to strengthen the policy approach to adaptation and resource efficiency in the design of new buildings.

26. **Renewable energy** – Government has consulted on a Renewable Energy Strategy and Heat and Energy Savings Strategy. These strategies set out the important role of the planning system in the delivery of low-carbon energy provision and infrastructure. We are therefore supportive of your general approach in encouraging renewable and low-carbon energy solutions and desire to see more heating and cooling networks. PPS 1 Supplement (Planning and Climate Change) states that regional planning bodies should set regional targets for renewable energy generation in line with PPS22, and ensure their ambitions fully reflect opportunities in the region, are consistent with Government's national targets and, where appropriate in the light of delivery, targets are periodically revised upwards.

27. Good work has been undertaken in the past on energy mapping, improving understanding of London's needs and opportunities, and we would encourage you to consider how this can be taken forward.

28. There are, however, some points of detail which are not clear from the initial proposals. For example, it is not clear what a 'pragmatic approach' to stimulating demand for renewables means. It is also not clear whether the implications of energy assessment requirements, especially for small scale development, have been fully

considered. Is it envisaged this would apply to every planning application? Would such an approach be proportionate, particularly for very small scale applications? How does this relate to other requirements which are already in place?

**29. Waste** – We welcome the approach outlined on proposals for waste, in particular the zero waste to landfill outside London aspiration, which will need to be supported by detailed policies on waste management. It will be important to ensure the Strategy plans for the full Plan period in order to allow individual or joint DPDs to be prepared in accordance with PPS12<sup>3</sup> without delay. Deliverability will also be an important issue for consideration, particularly if an approach to fewer, larger, facilities is taken forward (for example, what would the implications be if certain facilities did not come forward?). It is important to make explicit the linkages between waste and climate change and consider interregional linkages.

#### Other key issues

**30. Town centres** – We welcome the emphasis on a robust evidence base in developing policies to shape future town centre growth. We understand that this will provide the basis to “make strategic choices” about London’s town centres (as set out in PPS6, paragraph 2.13). You will be aware that government is currently consulting on a new PPS on economic development, which proposes specific requirements for the Strategy.

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**31.** What is meant by “inappropriate out of centre development” in the current initial proposals? Have you considered in detail how any policy on affordable small shops could be taken forward? We understand that there may be potential difficulties in taking forward such a policy through the planning system. We would welcome continued engagement on the policy approach to town centres generally.

**32. Outer London** – We note that you wish to recognise the distinct requirements of Outer London, although the proposals did not make clear details of the approach. How will this approach be replicated in Inner London, which faces its own unique challenges? The wording of the proposals suggests different priorities in addressing the challenges of Outer and Inner London (for example an emphasis on quality of life in Outer London and accommodating growth in Inner London). How is it proposed that this will address other Plan priorities and the promotion of mixed and balanced communities?

**33. Integrated Impact Assessment** – We will continue to work closely with GLA officers in ensuring that the Integrated Impact Assessment meets the requirements of Sustainability Appraisal and the Strategic Environmental Assessment Directive.

**34.** Further guidance on the requirements is set out in *Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents (Guidance for Regional Planning Bodies and Local Planning Authorities)*, including appraisal of

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<sup>3</sup> In particular the requirement to plan for a minimum 15-year period.

reasonable alternatives and relationship with national policy. We will respond separately to your consultation on the Integrated Impact Assessment.

**35. Approach to evidence** – We would welcome continued dialogue on your emerging evidence base. Given the timetable for review it will be particularly important for thorough consideration of how policies are founded on a robust and credible evidence base. This has been noted in a number of key issues above.

**36. Process and relationship to Local Development Frameworks** – In the spirit of PPS12, boroughs have often sought to ensure that they do not repeat policy included in the London Plan. How are you proposing to address concerns around any potential policy gaps arising from a new, shorter, SDS so as to minimise delay to development of borough Core Strategies?

I trust this response is helpful. As I said at the beginning these comments relate to your initial proposals and, as such, are not comprehensive. There are a number of areas that would benefit from further discussion between us. My officials will be in touch with your officers to arrange a suitable time to meet.

If you would like to discuss further please contact Chris Poulton, Head of Strategic Planning at the above address, by email ([chris.poulton@gol.gsi.gov.uk](mailto:chris.poulton@gol.gsi.gov.uk)) or telephone (020 7217 3286).

Yours faithfully,

**Chris Hayes**  
**Regional Director**  
**Government Office for London**

## Appendix A

### **Detailed comments on A New Plan for London: Proposals for the Mayor's London Plan**

In addition to the key issues set out in the cover letter, this appendix provides some more detailed points, a number of questions, and information which may be of use in developing the SDS.

1. Housing
  - i. PPS3, paragraphs 34-35 set out expectations for the SDS on assessing an appropriate level of housing, including setting housing provision, broadly illustrated in a housing delivery trajectory. It also sets out a broad range of matters to be taken into account when determining housing provision. How are you proposing to consider these in the light of SHLAA outputs?
  - ii. At paragraph 105, you refer to the NHPAU advice on housing supply ranges. You may also be aware that the NHPAU are expected to publish further work on supply ranges shortly. At present your references to the NHPAU supply ranges are slightly incorrect. The bottom end of the supply range for all regions is based on the revised 2004-based household projections distributed to meet the Government's target of 240,000 net additions by 2016. The top end of the supply range for London is based on a demographic method which is revised 2004-based household projections plus backlog.
  - iii. PPS3 also sets out the approach to be taken in respect of housing mix for affordable and market housing. The London-wide Strategic Housing Market Assessment is an important part of the evidence base in this respect.
  - iv. PPS3 sets the basis for determining affordable housing targets at regional and borough level through the plan making process. What is meant by the most effective balance between social and intermediate homes in paragraph 105? In addition to comments in the cover letter, how will the proposed numerical target (for the plan period) be monitored (on an annual basis, and with regard to the plan period), particularly in light of the current market downturn? How will the proposed numerical target inform negotiations on individual sites (where a percentage target will no longer be available as a benchmark against which to assess relative contribution to an overall target)? We would welcome further discussions on these policy proposals.
  - v. Your draft Housing Strategy has a target for provision of supported homes, already planned for in the National Affordable Housing Programme in London. How does this relate to your proposals at paragraph 110?

- vi. The references to Gypsy and Traveller accommodation will need careful consideration. As currently worded paragraph 112 could appear to be misleading. The GTAA results for a ten-year period address a backlog of need, rather than representing a doubling of existing need, as suggested. Have you considered whether it may be more beneficial to focus on the numbers of pitches required when seeking to address this issue? How are you proposing that provision after this ten-year period (for which need is identified in the GTAA) is taken forward? We would welcome continuing dialogue on provision for Gypsy and Traveller pitches.
- vii. With regard to policy on lifetime homes, this issue was carefully considered in drafting the Further Alterations to the London Plan. How are you proposing to “strengthen the promotion of lifetime homes standards”? In its National Strategy for Housing an Ageing Society, the government committed to all publicly funded housing being to Lifetime Homes Standards from 2011 and stated that its aspiration was to see all new housing built to these standards from 2013.

## 2. Climate Change, open space and related issues

- i. Government policy on planning for the effects of climate change on communities and how spatial planning can help mitigate further climate changes, is set out in PPS: Planning and Climate Change – Supplement to PPS1, and PPS22: Renewable Energy. These are supported by more detailed practice guidance.
- ii. We welcome your general approach to low carbon development and reducing CO<sub>2</sub> emissions. However, what is meant by ‘pragmatic approach’ in the proposals box underneath paragraph 151?
- iii. In paragraph 52 you refer to decisions at different levels which will have consequences for the future of the planet. Decisions at the local level will also have consequences for climate change.
- iv. You will be aware that the Code for Sustainable Homes is being introduced over time, with the aim of reaching zero carbon by 2016.
- v. It would be worthwhile ensuring that the transport chapter, air quality and climate change are clearly linked, particularly in the light of the impact of road transport on air quality.
- vi. Sustainable drainage is a key component of the draft Flood and Water Bill. It is proposed that the Bill will clarify who is responsible for delivery at the local level, and encourage local partnerships. The draft Bill proposed a requirement for developers to build new sustainable surface water drainage systems to new national standards that reduce flood damage, improve water quality and amenity. It also proposed removing the right for developers automatically connecting surface water run-off to public sewers, instead making the connection conditional on meeting these new standards for sustainable drainage.

We also proposed improvements to the way that misconnections of foul water to surface water sewers are dealt with to make this process more efficient. These approaches will help to reduce the pressure from new development on the public sewerage system and consequent increase in the risk of flooding from overflows and pollution to watercourses.

The use of sustainable drainage systems can also help to prevent drought and increase infiltration in urban areas closer to natural levels, through deep infiltration, refreshing the water-table and therefore increasing the amount of green cover. It would be useful to ensure that developing proposals are in line with the details of this Bill as they emerge.

- vii. Guidance for regional planning bodies on flood risk is set out in PPS25 and practice guidance. Are you proposing to incorporate the findings of TE2100 and flood risk appraisal work into your emerging policy proposals? With regard to paragraph 47, is it proposed that a new Regional Flood Risk Appraisal should support the new Strategy? In reference to your proposals box at paragraph 155, the Environment Agency (who have overall responsibility for Catchment Flood Management Plans) will be a key partner to work with closely as your policy proposals emerge.
- viii. It is unclear how proposals on large emitters of pollution will be taken forward. What definitions will be used and how with this be compatible with approaches such as Best Available Technique? Could the implications be that emissions are not reduced beyond any minima proposed? How is it proposed to implement such proposals through the planning system?
- ix. You may wish to consider how the distinction between Green Belt (national designation) and Metropolitan Open Land (Mayoral designation) is made in the draft Strategy.
- x. Referring to paragraph 186, the term inappropriate development has specific meaning (as set out in PPG2) in relation to green belt. The use of the term in relation to other open space could be confusing and could imply the status of green belt for other open space. Policies affecting open space which is not strategic would normally be made through the Local Development Framework process.
- xi. We welcome your reference to extending Green Grid principles and set out policies maximising the contribution made by trees and woodland. We understand that your proposals for increasing green space in central London flow from research undertaken in Manchester which found that increasing green 'coverage' in high density areas by 10% could mitigate temperature increases from global warming. The proposals for increasing the number of trees, particularly street trees, and proposals for green roofs and walls could be ways of achieving this increased coverage and assist in rainfall capture. The Centre for Evidence Based Conservation at Bangor University are currently undertaking a study on how effective the 'greening' of urban areas can

be in reducing human exposure to ground level ozone concentrations, UV exposure and the urban heat island effect. Their preliminary work found that a few studies suggested that the effect of a park or areas with trees could reduce temperature in the surrounding non-green area. However, it also found that the change in temperature with distance from the green area, and the abundance and distribution of greening necessary in an urban area, for there to be a general cooling effect rather than solely localised cool islands within green areas requires further investigation. Are you expecting to commission further research to support your approach, and would any targets be indicative at this stage? How would any target be implemented?

- xii. We also welcome the Strategy's proposal to address biodiversity issues as an essential component of sustainable development. How is it proposed that the regional biodiversity framework will be embedded into the SDS?
- xiii. When developing policies on aggregates, it will be important to have regard to the National Aggregate Guidelines, which will be published shortly.

### 3. Supporting growth, providing infrastructure and other issues

- i. With regard to paragraph 209, how will strategic priorities for planning obligations be determined, particularly if the scope for developer contributions is limited in the short term, and what considerations will you have to economic viability in developing policy proposals? Will the proposed approach set out the hierarchy of priorities more clearly than currently proposed, for example as drafted in the draft Crossrail Alteration?
- ii. Similarly, how will you ensure an appropriate balance between strategic and local requirements in both Section 106 and Community Infrastructure Levy in proposing approaches to these?
- iii. We welcome the pro-active approach to considering the need for infrastructure, in particular water infrastructure, which will need to be carefully considered in conjunction with neighbouring regions. We look forward to further detail on the proposed integrated approach to infrastructure planning and an Implementation Plan, including details on timescales.
- iv. With regard to social infrastructure, we look forward to further details on how a range of social infrastructure can support communities. How will these proposals relate to the Mayor's sports legacy plan? Will the Strategy also consider how the cultural sector can support quality of life and the visitor economy? When considering social infrastructure, are you proposing to recognise broader criminal justice facilities of strategic importance (such as prisons)?

- v. We welcome reference to high-speed rail infrastructure. You will be aware that High Speed 2 (HS2) Ltd are expected to report to government by the end of 2009.
- vi. We note your reference to a third runway at Heathrow Airport at paragraph 167 and the proposals box following paragraph 170. Government policy is that a third runway at Heathrow should be built. You will be aware of the statement made by Secretary of State for Transport, Geoff Hoon, on 15 January 2009<sup>4</sup>, which set out current Government policy on a this matter. Furthermore, you will be aware that a number of proposals for alternative sites in the South East, including estuarial airports, were evaluated during the *Future of Air Transport* White Paper consultation in 2002/3. These were all rejected for a variety of reasons including: lower net benefits, high construction costs, lengthy construction times, high surface access costs, impact on sensitive habitats and risk of bird strike (safety issue), risk of financial viability if demand proved less strong than forecast. The Government concluded that none of the alternative schemes was clearly superior to the options for developing existing airports in the South East, or viable within the timescales under consideration.
- vii. We welcome reference to growth areas, and the interregional approach in taking them forward. Do you propose to address the cross-boundary issues in relation to supporting growth, building on initiatives such as the North London Development and Investment Framework? Are you proposing to recognise nationally designated Opportunity Boroughs (Barnet, Brent, Islington and Croydon)? We would welcome further clarification on how you will make strong progress towards Thames Gateway Delivery commitments for new homes and jobs as set out in the Thames Gateway Delivery Plan.
- viii. We welcome reference to the Olympics and, crucially, gaining the maximum benefit for the communities of East London. We have set out a clear cross-Government commitment to deliver a successful and inspirational Olympic Games with a sustainable legacy.
- ix. The emerging Strategic Regeneration Framework (SRF) will set out an ambitious programme of social, physical and economic transformation in the five Host Boroughs. How will you work with relevant agencies, including Boroughs, to ensure the aspirations and transformation projects are appropriately reflected in the Spatial Strategy for London?
- x. Transformation of the local economy is a key issue in the emerging SRF. This reflects the Government's Eco-Region policy for the Gateway which could be given greater prominence in the London Plan. We would welcome the opportunity to work with the Mayor and his

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<sup>4</sup> Available at columns 355-360:  
<http://www.publications.parliament.uk/pa/cm200809/cmhansrd/cm090115/debtext/90115-0005.htm>

Teams on this agenda and seek clarification on his proposals and to ensure the London Plan reflects Thames Gateway policy commitments to achieve 225,000 additional jobs in the challenging economic climate. We would particularly like clarification on the proposed Green Enterprise zone.

- xi. We welcome the Mayor's continued commitment to Crossrail, which will be an important part of the infrastructure enabling delivery of the Government's Gateway objectives. Furthermore, the SRF is also exploring a need for improved north-south strategic links. We would welcome discussion with the the London Plan Team and TfL regarding specific investigation into improved north-south connectivity as well as appropriate strategic interventions to transform the public realm.
- xii. We welcome reference at paragraph 186 to growing food and open space. Access to fresh, healthy is an important issue in London (recognised at paragraph 54), particularly in respect of food deserts. How are you proposing to take this issue forward in addition to proposals on open space?
- xiii. In the proposals box below paragraph 198 you raise the issue of burial space. It is unclear whether the re-use of graves provisions in the London Local Authorities Act 2007, if adopted by individual Boroughs, would resolve London's limited burial space entirely. The Act permits the re-use of private graves, but not the re-use of public graves (the majority of old graves in London are understood to be public rather than private ones).