

Waterloo Community Development Group

A Company Limited by Guarantee, registered in England & Wales
Registration No. 4269850
Registered Charity No. 1114299
Registered Office: 14a Baylis Rd, London SE1 7AA
Tel: 020 7633 9291 Fax: 020 7401 2469
Website: www.wcdg.org.uk
Email: admin@wcdg.org.uk



John Lett
GLA London Plan Team

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Dear John

RE: FURTHER ALTERATIONS TO THE LONDON PLAN

Thanks for attending our public meeting last month regarding the FALP. Your commentary allayed many concerns, although a number remain, We would like to make the following comments and objections.

We would like to be involved in the Examination in Public of the FALP.

NB Numbers in **bold** refer to the changes proposed in the FALP, to which we are objecting.

The existing London Plan is deeply flawed and London needs a new plan. The rate of growth of population is 70% higher than predicted and threatens to become the largest and fastest growth in London's history since the industrial revolution, although there appears to be no industrial, technological, economic or supra-demographic driver for this, and no obvious benefit to existing or future Londoners. Already there are huge pressures which are not being addressed, most obviously the need for housing and for affordable housing, the housing price bubble and the general land price inflation, the rapid loss of employment land, the pressure on public transport, congestion and the worsening environmental conditions (air quality), and growing inequalities and ghettoization.

The London Plan to a large extent exacerbates this by encouraging maximum growth in the obsessive race to be a 'world city', a goal set in at the start of the century before the collapse of the financial sector in 2008, when there was purportedly a fear that with the Euro London would be replaced by Frankfurt or Paris as the financial centre of Europe. There is now no doubt that London is the financial centre, and there can be no fear that taking the foot off the accelerator will threaten that. It is also increasingly apparent that some of the impacts of being a 'world city' were not thought through, such as the fact that the financiers and ultra-rich will require ownership of a large residential property in central London which will be used only very occasionally, or that this trend will bring such pressure on central London land prices that it will effectively make land here a reserve currency. The absurd hubris of London being "the Greatest City on Earth" exacerbates this. **[0.16D]**

The FALP fails to address these concerns, and does not render the Plan unsound. The FALP admits to being only an interim plan **(1.10B)** while new patterns settle down allowing the planners to read them to predict future need and plan. This approach goes to the heart of the problem, which is the predict and provide approach to growth which, given the extraordinary and unpredicted growth over the past decade, is completely inappropriate. For this reason the FALP's "underlying philosophy – to seek to accommodate growth" **(1.10D)** is flawed. There is need for a cross-regional plan (with the

ROSE) and a national plan to address demographic change and to direct growth away from central London where possible without harming London's vibrancy or the Green Belt. (We therefore object to the proposed deletion at **2.2B**). As such the changes of the FALP are inconsistent with Policy 2.1b requiring the development of London to be supportive of the social development of the UK and its network of cities. London only provides marginally more jobs proportionally than residents, but this is proposed to narrow further as population growth (23%) will outstrip jobs growth (18%), despite the fact that London as a capital city accommodates national employment uses such as government, culture, sport, and business (**2.12**).

The FALP admits that growth predictions in the LP have been woefully inadequate, and that as recently as 2011 the amount of growth between 2001-11 had been underestimated by around 70% (extrapolated from figures in **1.7**), but it offers no more than anecdote by way of explanation as to why its predictions were so wrong (e.g. **1.15, 1.15A**). Without a better ability to predict, including an understanding of why previous predictions have been so inadequate, a predict and provide approach is bound to be flawed. Simply stating that London's population will rise to 10.11 million in 2036 (**1.10E**) and then setting about desperately finding land to accommodate this growth is wrong-headed, particularly when this approach threatens strategic employment-generating land and town centres.

The drive to growth is crude, and is not even qualified as 'sustainable growth' as set out in the NPPF, e.g. **1.45**.

Where does all the residential growth go in London? Put simply, not in Outer London, all in central and inner London, in increased Opportunity Areas and Regeneration Areas, and through the 'release' of strategic industrial land and of 'some' town centres. All these elements are misguided.

2.31 change makes clear that the generally high quality of life in outer London must be protected from growth by "recognising the positive contribution of existing, lower density housing in lower PTAL areas". The logical implication is that as a result growth will have to be accommodated in central and inner London, where quality of life is already poor and can only decline. By way of example every single major residential proposals in London South Central (including the 4 Opportunity Areas Waterloo, VNEB, London Bridge and Elephant & Castle) over the past decade has resulted in sunlight and daylight levels in some flats in the proposed developments or adjacent existing residential to fall below the BRE minimum guidelines. Sometimes this involves hundreds of units (e.g. Shell centre), sometimes the light levels proposed are horrifically poor (8 Albert Embankment). These shortcomings have always been justified at GLA and borough level on the grounds that growth must be accommodated at higher PTAL levels/ Opportunity Areas etc. The proposal at **2.31** will exacerbate and cement the inequality of approach between inner and outer London. It could be argued (and was by the Inspector at 8 Albert Embankment) that existing poor quality of daylight and sunlight means that reductions should be less acceptable, not more acceptable; yet the reverse is the implication of **2.31**. Again, Policy **2.8h** and changes at **2.36** proposes accepting greater reliance on the private car and flexible parking, despite the appalling air quality issues affecting the whole of London (pollution is no respecter of inner/outer boundaries). We support change at Policy **2.11B** and **2.46**. The problem with the CAZ at the moment is that it is used as an 'anything goes' policy, undermining clusters and centres, even if granted CAZ frontage designation; more guidance from boroughs could address this over-flexibility.

Opportunity Areas Policy 2.13 and Appendix 1

We object to the proposed increases in housing and employment targets which appear without sufficient evidence as to why these additional numbers can be accommodated. The **VNEB OA (33)**

for example is proposed to double the minimum homes from 10,000 to 20,000 and jobs from 15,000 to 25,000. The original figures were produced as the result of a detailed exercise in establishing the VNEB, and were already the highest of all the five options (and too high to maintain quality of life issues in our view). Many permissions have been granted, much has yet to be built, no employment at all has been built, few applications for employment have been pursued, the likelihood that the Vauxhall area will take off as a large office destination is decreasing all the time (with Lambeth Council planning to move out of Phoenix House, the only significant office in the St George's wharf complex) – and yet a 66% increase in the amount of employment which can be achieved here is proposed. Why? This is neither reasoned nor justified with evidence. Similarly Waterloo OA (35) new homes target is increased from 1,900 to 2,500 i.e. about 30% with no evidence provided. Meanwhile London Bridge OA (21) has granted permission for over 1,000 new homes since 2009 in a part of the OA area not envisaged for residential (all of it is change of use from offices) yet there is no proposed uplift of residential there. This is inconsistent.

Town Centres

We strongly object to the changes proposed in **Policy 2.15 and text 2.72. 2.72A-H**. The proposals for allowing some town centres to be reduced in size and consolidated to allow for high-density housing at transport nodes appears deeply flawed for a number of reasons. The suspicion is that the desperate housing need is driving this, rather than the need to consolidate town centre or the flimsy evidence of retail decline in London.

A fundamental problem of FALP in its analysis and approach to town centres in considering the purported decline in high street retail is that it considers the issue of retail in isolation: but town centres perform a number of different interlocking functions which mutually support each other and make it a centre:

- Retail – convenience and comparison, necessity and leisure, for resident and passer-through/ commuter/ worker/ tourist
- Leisure and culture – cafés, bars, restaurants, clubs, cinemas, theatres, museums, libraries, education facilities
- Office – company HQs, council, solicitors, finance,
- Light industrial and services – car menders, food suppliers, artist studios, employment and training facilities
- Civic uses – council HQ, births/ marriages/ deaths
- Public space – shared civic space, safe space for teenagers, public gardens, main square
- Transport node – buses, trains, tube, buses, taxis

There is no evidence that any of the other elements are declining in use – indeed some are increasing such as leisure and culture, and many are bound to increase given the increasing population, such as the role of transport node. So any reduction in the need for land for retail in town centres is likely to be replaced by a need for these other uses.

An example of this is West Norwood, where a parade at the southern end has been in decline for over a decade and has many vacancies and was proposed for deletion from the retail centre in the Local Plan, which would release it for housing; however, in recent years the council has committed

to building a new fitness and leisure facility at this end of the town centre, as well as a new library and cinema, and the church green adjacent has seen a renaissance as the newly formed Business Improvement District has established a regular weekend food market/ festival, all of which has led the council to reverse its decision to de-designate the parade, albeit after considerable local campaigning.

Furthermore there is considerable evidence that, rather than declining as posited, in fact high streets and town centres have strengthened over the past decade, both in terms of retail and absolutely. The areas we know well are in a notably more healthy state than a decade ago e.g. lower Marsh, Elephant & Castle, Brixton, Clapham, Stockwell, Peckham, Camberwell, Clapham Junction/ Lavender Hill. All of the centres in the CAZ show much more vitality and viability they did a decade ago. This list includes major town centres and district centres. There is no evidence that the deliberate strategic strengthening in major centres at Peckham and Brixton has had an impact on neighbouring smaller centres such as Herne Hill or East Dulwich/ Lordship Lane (contrary to Experian conclusion 1.14) We would not deny that there is room for residential growth at all these centres, but that this should or needs to be at the expense of retail. Housing above retail is problematic for other structural reasons – for example banks are very unwilling to provide mortgages for family residential above retail. These issues need to be addressed, not retail parades de-designated.

The evidence provided by the GLA for these changes is the Experian report ‘Consumer Expenditure and comparison goods floorspace need in London’ Oct 2013. This evidence has a number of flaws, including the problem highlighted above that retail cannot be looked in isolation when considering the healthiness of town centres. Detailed research (attached) published by the LSE of Peckham Rye and elsewhere evidences that the economic activity beyond the core traditional retail high street is greater than that within the core, which is all that Experian analyse.

The conclusions that Experian reach are in contrast with the conclusions provided for the LP in 2011, which predicted the need for a large increase in retail. The conclusions are also in contrast with analysis and predictions produced by the boroughs in support of their Local Plans (e.g. Lambeth’s retail evidence 2013, using similar methodology to Experian, attached) or the impact analysis provided for major retail proposals such as that provided for the new retail destination proposed for Battersea Power Station upon affected town centres.

Experian make generalised statements about changes to shopping habits, particularly the strengthening of major malls and the move from shop-based retail purchases to on-line retail. But the position is more complicated than this, for example on-line shopping in secondhand books was initially seen as a threat to high street secondhand bookshops but has more recently become to be seen as a means by which to sustain a high street presence through on-line sales. Furthermore, much of this driven by technology which is focusing on making significantly smaller gizmos (contrast the size of phones or computers a decade ago with the iPhones and iPads currently purchased) which are far more amenable to maintaining stock in a high street outlet. Indeed one of the future retail predictions is that shoppers will purchase via the internet and then pick up the purchase at a transport node such as Waterloo station, on the way to work.

Experian predict a number of surprising/ bizarre scenarios. In our view it significantly under-estimates the growth in tourist and leisure shopping, as well as commuter shopping (Fig 25). The breakdown of spend (Fig 24) does not include workers, a major source of spend in places in the CAZ. The amount of spend by commuters seems significantly under-estimated (Westminster, with Victoria, Paddington and Charing Cross is considered to be made up of only 6.2% of commuter spend but 61.1% of residential spend.

Some of the facts in the evidence are just wrong: the Shell Centre development has not started, it doesn't even have permission yet (Fig 29); retail at BPS is considerably more than 25,674m2.

Many of the assumptions behind these predictions are highly questionable:

- The gravity modelling for shopper flows is done on postal sectors the size of wards, while the number of centres analysed is around 300, equivalent of roughly one per ward: this is far too crude to plot the real behaviour of real shoppers
- “the measurement of travel distances uses drivetime estimates as a basis” (5.28) when driving accounts for a very small minority of shoppers in many centres in inner London and the CAZ (only 30% of households even have access to a car across Lambeth, with lower percentages the nearer to the centre you go)
- “Bus travel times are assumed to be similar to travel times by car” (5.29)
- “there are no official estimates of how much in London is spent near the workplace rather than on destination shopping trips”. (2.14)
- Charity shops are treated as if they were vacant (3.10) when in fact they are a major way for the poorest to buy comparison goods and recycle goods
- The estimates and forecasts are all based on GLA Demographic projections which have been 70% out over the past decade and don't reflect the fact that 57% of new build residential in central London is purchased overseas, for example, and therefore more likely to be unoccupied.
- “households appetite for credit will be reduced as they seek to pay down debt rather than borrow to spend” (4.14) – the recent upturn in the economy and the house price bubble both suggest the opposite is happening in London
- There is no residence-based domestic tourist spending hard evidence, and “we have had to rely on estimates inferred from place-of-spending estimates” (4.35), or evidence of the comparison/ convenience split of tourists, domestic or otherwise, or the proportion of spend by tourists on retail goods (4.27-8)
- Gentrification and change locally over the next 20 years are ignored (4.23)

None of the baseline evidence is provided in the appendices to allow these conclusions to be properly tested. Worst of all there is little evidence that the predictions made through these methods are systematically tested. It is a fundamental feature of genuinely scientific knowledge (as opposed to pseudo-science or voodoo) that predictions must be testable and tested. Without this comfort in these predictions is misplaced. There is very occasional reference to testing, not against actual spend, but against shoppers claims provided from shopping surveys (referred to at 5.15 and 5.17) but none of this evidence is provided.

And yet the quality of the assumptions drives a hugely divergent outcome: the upper extreme is a prediction of 3 million sq metres gross of retail by 2036, and the lower is 0.75 million sq metres gross by 2036. The difference between these two – one of which may justify the proposed FALP policies, the other would definitely not – are brought about simply by mildly tweaking the assumptions.

The proposed changes to policy on town centres in FALP is potentially devastating given the extraordinary pressure on land values exerted by the house price bubble, which is encouraging/forcing local authorities and the Mayor to approve changes of use and the release of 300% more strategic industrial land than predicted. It will be more difficult to protect town centres with good PTAL from rapacious developers determined to drive out retail and replace with high-value housing.

Open Space

We object to the inserted reference to public accessibility (**7.18C**). Many open spaces are not accessible yet provide public benefit e.g. London Squares, or Lambeth Palace Gardens.

Climate Change

Current scientific evidence indicates that the effects of climate change will only remain manageable if global temperatures rise by no more than 2°C above pre-industrial levels. For this to happen, worldwide emissions must peak by 2020 and be cut to 50 percent of 1990 levels by 2050. The conurbation of London is a significant contributor to this effect yet this plan still evades quantifying London's role, and fails to set any targets for the realistic reduction of the capitals' emissions of greenhouse gases. In view of the expected +/- 2million increase in population by 2021 and further increases thereafter, statistical knowledge and analysis of local and other global contributors is critical if London is to effectively control emissions of carbon dioxide from all sectors (commercial, domestic, industrial and transport), survive and grow.

Other Comments

Policy 2.18 Green Infrastructure: The strike-thru of OPEN AND from the title, announces the confusion, throughout these drafts, between aspects and functions of the biosphere in reducing climate change effects, improving the environment, delighting the senses etc.

LDF preparation: an indication that this paragraph has been moved to Policy 7.18 d) would be helpful in view of the subjects' importance.

I'm sorry that the fleeting injunction gives no direction as to the type of data in the audit (e.g. park provision per 1,000, green space per 1,000 population, anticipated increase/decrease ha per 1,000 population by 2026).

2.88 Unlike retail, office and particularly housing there are no pre-existing surveys referenced and no acceptance that 'intensification' in the above mentioned trio will not work without increase and intensification targets within this policy.

3.19 Housing supply targets (Table 3.1) has to high intensification in already overpopulated and deprived Boroughs e.g. Southwark and Tower Hamlets and inversely proportionate targets in lower density, wealthier Boroughs e.g. Kensington and Richmond-upon-Thames.

3.46 The deletion implies non-compliance with NPPF Guidance, but is difficult to assess along with the changes in 0.16A – C.

3.84 An abundance of figures, closely monitored between drafts and a Strategy that sets out measures to achieve a target level, but why none for Climate Change/Green Infrastructure? The lack is striking.

4.23 Release of surplus industrial land, office space, and, as mentioned in Policy 2.15, surplus retail (4.40 – 4.43) should be an opportunity to defuse climate change generators and boost open/green infrastructure.

4.48a How is evidence of need to be assessed fairly? Community Assets + Community Rights can work for some but not others- e.g. South Bank Skate Boarders.

5.85b Should S106 read CIL?

6.26 As **Policy 8.3** has no amendments the ~~strikeout~~ is inexplicable.

7.17 Audit but no hint of targets.

Yours sincerely

Michael Ball
Director