

Format, Scope and Content of the Plan

M7. Does the Plan set out a spatial development strategy in accordance with relevant legislation and national policy? In particular:

a) Does the Plan deal only with matters which are of strategic importance to Greater London?

The existing London Plan sets out the duties of the GLA and the role of the London Plan in a much more thorough manner. The London Planning Statement 2014 refers usefully to the issue of strategic importance e.g. a cumulative and comprehensive framework so that policies that in their own right might not appear strategic are when considered cumulatively. We seek inserts into the new London Plan from these 2 documents.

b) Would the policies in the Plan provide an effective strategic framework for the preparation of local plans and neighbourhood plans in London?

c) Does the Plan address detailed issues that would be more appropriately addressed in local plans and neighbourhood plans?

Issues in London are complex and need to be addressed in detail in the London Plan in part for resource reasons. The Boroughs lack resources, for example the loss of conservation and biodiversity officers, and the Mayor must pick up this detailed work. Whilst the Mayor's Transport Strategy supports sub-regional work this is not picked up in the London Plan. Detailed work through sub regional planning has been lost.

Small sites should be addressed in Neighbourhood Plans as this will provide community buy in. At present Policy H2 sets targets for small sites without data that is locally sourced. Policies for safeguarding the High Street are a further example.

d) Is the approach to planning in London described in paragraphs 0.0.21 and 0.0.22, particularly with regard to the relationship between the spatial development strategy and local plans, neighbourhood plans and the Boroughs' development management responsibilities, justified and consistent with national policy and legislation?

The Plan gives virtually no recognition to neighbourhood planning, contrary to NPPF para 184. This compares poorly with the wording in the existing London Plan at the Introduction 0.2A and in the supporting text for Policy 7.1 Lifetime Neighbourhoods. Particularly 7.6, 7.6 A, 7.6B

“Neighbourhood Plans are a mechanism for the Boroughs and community led groups to agree on local priorities , including those for investments through the Community Infrastructure Levy.

Community-led projects in general or Community Rights that give powers to communities to take more control over the areas where they live such as through Community assets, are a complementary route to the usual planning process and can help community-led groups build new community spaces, new shops or housing, save valued local amenities or take over local services.”

There needs to be a more supportive framework from the Mayor for neighbourhood planning. This level of activity cannot be just left to the Boroughs. Community engagement and participation are a Mayoral responsibility.

This supportive framework should include tools such as Social Impact Assessments and Local Economy Audits, which we discuss in detail in other written statements.