

M8. Given the legal requirement for the Mayor to have regard to the need to ensure that the Plan is consistent with national policies, is it justified for certain policies to deviate from national policy and guidance?

The existing London Plan is stronger on this than the draft London Plan. We propose additional text be taken from the existing London Plan para 0.14 “The London Plan can be seen as the expression of national policy for London, tailored to meet local circumstances and to respond to the opportunities to achieve sustainable development here.”

The absence of a sustainable development definition is contrary to NPPF. The Mayor seems to argue that Good Growth is aligned with sustainable development, but this needs to be made explicit and defined. The Introduction should refer to the UN Sustainable Development Goals, picking up on poverty, equality and inclusion. The minor change that good growth = inclusive growth has to be elaborated upon.

In replying to the Panel’s Question the Mayor has provided a list where the London Plan policy deviates from national policy and guidance. This short list is incomplete. For example, active travel.

We suggest the London Plan can be much bolder in making the case for policy deviation from the NPPF due to particular circumstances that exist in London, not least the housing crisis. There should be departures on:-

- accessible housing (we would refer to evidence presented at MALP)
- social rented/ council housing The setting of a separate target for social rented homes and the definition of affordable housing, so that for social housing rents are aligned with running costs (management, maintenance and repairs).
- To respond to the severe problem in London of inflated housing land values by removing viability testing as a major criterion in planning decisions; it undermines a plan led system and makes it harder to deliver liveable communities.
- protection of the High Street and the local economy can also be much stronger in policy terms given the evidence that exists.

This is not the final list that we wish to speak to. The boundary of local circumstances could and should be pushed much more.