

The London Plan: Sub-Regional Development Frameworks

Analysis of Consistency, Alignment and Value Added

To inform a response by
the London Assembly Planning and Spatial
Development Committee to the Mayor's
consultation

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OVERVIEW

Overall Findings

Consistency	Generally good within the constraints of preparing them, and given that thinking moved on between May and July 2005. Some minor differences in terms of factual information included, but suggested actions broadly comparable.
Alignment	Broadly OK. A few examples of stating best practice or policy aspirations as if they were London Plan policy. Mixed messages as to how some policy updating will be introduced.
Value added	Useful descriptive function and inclusion of recent monitoring data. Useful start on integrating social and physical infrastructure elements with traditional land-use planning. Should assist with speedier and more strategic LDF preparation in boroughs with limited forward planning resources. Proposed actions insufficiently tailored to sub-regional context.

Possible Issues for Committee Response

The following could form the basis of recommendations to GLA officers. (References in brackets are to paragraphs within the report text or annexes following).

Consistency

- i. Differences in approach to proposed actions should be resolved where not related to the particular characteristics of sub-regions (para 11 below).
- ii. Gaps should be filled wherever possible, e.g. possible land requirements for health and particularly education sector (para 33, Annexes A and C).
- iii. Topics where actions are proposed without reference to any database should be substantiated, e.g. on housing mix (para 10 and Annex A).
- iv. Minor inconsistencies, e.g. in presentation of figure work should be corrected (Annex C).

Alignment

- v. Qualification is needed on some statements within SRDF text to refer to best practice, rather than prescribing policy to be applied at the Borough level as if it were from the London Plan, e.g. biodiversity, waste and renewable energy (paras 18-20).
- vi. Clarification is needed on what procedural route will be used to make updates or extensions to London Plan policy, e.g. revising guidance on the release of industrial land (paras 21-24). Changes to the role of town centres within the network should be made through a statutory plan (para 25).

Value Added

- vii. Attempts should be made to make proposed actions as sub-regionally specific as possible (further work needed particularly on transport, para 34). Also applies to the strategic direction (para 28).
- viii. Presentational improvement could be made to Annex 5 to separate out issues for LDFs from those for the London Plan review (para 36).

Clarification of next stages

- ix. There is a need to ensure that finalisation process continues to receive sub-regional partnerships' support and does not introduce new elements that are more appropriately dealt with at Borough level e.g. Areas for Tall Buildings, or extend London Plan policy e.g. implications of the new Housing Capacity Study (para 41 and Annex B).

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1 INTRODUCTION

- 1 This report provides conclusions and recommendations from a brief desktop review of the 5 draft Sub-Regional Development Frameworks (SRDFs). It focuses on their content, in order to complement the feedback obtained on the process of preparing SRDFs at the Committee meeting on 14 July.
- 2 It is acknowledged that SRDFs are an innovative process. Their preparation was clearly valued by the sub-regional partnership representatives at the Committee meeting, for example "We are on a journey" (North London Strategic Alliance, 14 July).
- 3 It is also acknowledged that events have moved on, e.g. the Olympics 2012 success, as has thinking in procedural terms, between the publication of the first SRDFs in May 2005 (East London) and the last two in July 2005 (North and Central London).
- 4 Three exercises have been completed in this research (within a very short time period - 8 days):
 - consistency checks (comparison between each of the 5 draft SRDFs, followed by judgements on which differences are of any significance);
 - alignment checks (comparing the content of the draft SRDFs against the London Plan, followed by judgements on whether the extent of any policy elaboration is within acceptable bounds -- this requires an understanding of the status of SRDFs. It has also been useful to bear in mind the concerns expressed at the time of the London Plan EIP); and
 - value added (judgement informed by discussion at 14 July Committee, and limited networking amongst practitioners).
- 5 Observations from individual documents are supported by references in brackets to paragraph numbers of the draft SRDFs, proposed actions from the relevant sections within their 5 Chapters, or to data in their 5 Annexes.

2 OBJECTIVES FOR SRDFs

- 6 This section provides a view on how far the draft SRDFs have achieved their objectives. These objectives are largely taken from the London Plan.

Objectives	Success
To address issues of wider than borough significance (London Plan, para 5.5)	Yes, good descriptive background and a digestible form in which to understand the implications of topic specific research. Future challenges are identified. For comments on coordination of policy, and definition of sub-regional boundaries, see Value Added section below.
To provide a key link between London wide policies and implementation (London Plan, para 2.29)	Qualified success. Many of the so-called "Actions" lack a sub-regional dimension. Topics that are well developed include culture, leisure and tourism (1D), industry and warehousing (1G), open space and Blue Ribbon (4D)

To take advantage of their flexibility in terms of status and procedure (SRDF web homepage)	Qualified success. Some parts of the text seek to extend existing policy statements in the London Plan, see Alignment section below. Unclear on future procedures
To bring together wider issues relevant to the implementation of the London Plan, outside the constraints of conventional land use planning (SRDF documents and web homepage).	Yes, a good start. Feedback from sub-regional partnerships at 14 July Committee suggests perceived progress in areas such as health. A long way to go before identifying spatial requirements of essential services, e.g. health, education. Little information included on programming of major public transport schemes.
Supplementary Objective	
To identify issues to inform the London Plan review	Introduction to the SRDFs documents stress that this is a useful byproduct. Results are in the final Annex (5), which is said to be not formally part of the SRDF. But the Annex merely brings together issues that are all interwoven into the main body of the SRDF.

3 CONSISTENCY

- 7 GLA officers have worked with several parties, particularly the sub-regional partnership, to identify strategic issues within each sub-region, discuss a strategic direction, and produce a draft document. The work has been undertaken over a period of at least one year.

Treatment of subject areas

- 8 This is reviewed on a topic by topic basis in Annex A below. The material included is generally consistent, particularly on town centres and transport.
- 9 Arguments are supported by the inclusion of monitoring data and the findings of recent research. Annex 4 of the draft SRDFs contains detailed tables, graphs etc in a consistent format. This makes comparison between boroughs and sub-regions very easy. There are some variations, as highlighted in Annex C below. Some of these differences are explained by particular sub-regional characteristics, e.g. additional information about management of the night-time economy in Central London. Other differences appear to be because of the availability of information readily to hand.
- 10 The housing mix section in the draft documents' Chapter 5 is inconsistently argued and not justified by data in Annex 4, except for Housing Corporation 2004/06 allocations.

Consistency of proposed actions

- 11 Five areas have been identified where there are differences in the proposed actions which are not readily explained by distinct sub-regional characteristics. Three of these relate to housing density and mix:

Housing density and mix

- the Sustainable Residential Quality (SRQ) matrix is only mentioned as an aid to Boroughs including detailed density policies in their LDFs in Central London (5A). This matrix identifies a range of desirable densities and car parking standards for locations with differing levels of public transport accessibility. It is included in

London Plan Table 4B.1 as guidance throughout London. It is understandable that Central London Boroughs should include proposals for "high" densities, and other areas "higher" densities, given the importance of maintaining quality of life in the suburbs, as particularly mentioned in North and South London;

- Boroughs are "asked" to consider locations for selective intensification within the suburbs in North London, and "should" consider such locations in South London (2C), but not in East or West London;
- views are only sought on whether areas should be defined to be targeted for "balancing" their communities in East and North London (1A);

Hotels and Opportunity Areas

- Boroughs are encouraged to suggest hotel sites in East, North, South London but not in Central and West London (1D). However these latter 2 areas have the largest number of additional hotel rooms forecast (on current trends);
- the views of stakeholders are sought on whether the boundaries of Opportunity Areas should be extended to include their hinterlands (i.e. immediately surrounding areas) in all 4 SRDFs covering outer London (2C). It is suggested that this could signal the need to spread the benefits of development, particularly new jobs, to surrounding communities. This is not a proposed action in Central London. The idea is developed furthest in East London which contains a plan indicating possible extended boundaries (Annex 4, Map 2.1). There is no discussion as to what implications this approach might have in terms of attractiveness to developer investment.

Presentation

- 12 Some actions, which are consistent across all drafts, may appear in a different order, for example the promotion of SMEs, consolidation of the office market, and monitoring with a view to releasing industrial land for housing (proposed actions 1B). This is entirely understandable, and is reflecting local circumstances.
- 13 There is also some variations in terminology. East London and Central London have proposed actions and "questions" to inform responses. In other three these are all included as proposed actions.

4 ALIGNMENT

- 14 The thrust of all the draft SRDFs is compatible with taking forward London Plan policy. Indeed in most cases any policy elaboration is clearly cross-referenced back to the relevant London Plan policy. This is compatible with the intended status of SRDFs. Annex B explains the issues surrounding status, as context for the conclusions that follow.
- 15 In most of the proposed actions that guide Boroughs on the preparation of their LDFs or the way in which Boroughs should determine applications, the wording is careful to say such things as "Boroughs are invited to", or "Boroughs are asked to" rather than being "required to".
- 16 The inclusion of indicative boundaries for Opportunity Areas, Areas for Intensification and Strategic Employment Locations is nudging at the boundaries of acceptability. Hence the careful wording in the Introductions about the use of OS plans, and the wording in introducing Annex 2 in some but not all of the drafts that these are for "discussion" rather than for "consultation".

- 17 However, there are two types of situation where the draft SRDFs may be extending policy beyond that which is acceptable:
- i. in the background text where best practice policy is sometimes stated baldly as if it were London Plan policy to be applied by the London Boroughs through development control or in preparing their LDFs;
 - ii. where new data has been analysed which could prompt a variation in policy.

Extending London Plan policy

- 18 Instances of attempts to extend **development control** policy are:

- A consistent statement in the draft SRDFs that “All development should generate a net increase in the quality and quantity of wildlife habitat. Where this is not present on-site and all opportunities associated with the site have been considered (including those outlined in Building Green for example), financial contributions to the provision, management and resourcing of ex-situ habitats and species (the Mayor's wildlife sites, and priorities identified by local Biodiversity Action Plans) should be made” (e.g. South London, para 183). This may relate to consultation draft best practice guidance on Development Plan Policies for Biodiversity, 2004. However this goes further than London Plan Policy 3D.12).
- An interim development control policy pending the forthcoming Alterations of the London Plan such that consideration of proposals which would entail significant loss of industrial land (usually over 0.5 hectares) should take into account strategic and local waste policy and need assessments. This goes further than London Plan Policy 3B.5 and para 3.129.
- A statement in the Central London draft that To facilitate integrated planning it may be “appropriate” to apply this principle (i.e. extending the housing increment policy operated by Westminster, Camden and Lambeth) to the whole of each Area rather than individual sites within it. This appears to encourage other Boroughs in the Central Activities Zone and its associated Opportunity Areas to adopt a development control policy without it being tested through subsequent LDFs (Central London, para 242);
- In line with best practice it is recommended that developments of more than 1,000 sq m (or 10 housing units) should be required to provide at least 10% of its electricity from on-site renewable sources. (e.g. South London, para 171). This goes further than London Plan Policy 4A.9, but is stated clearly as a recommendation rather than a requirement.

- 19 An attempt to extend **development plan** requirements is:

- LDF policies should include boroughs targets and guidance for renewable energy generation having regard to the aspirational target of 665GWh for London by 2010 in the Mayor's Energy Strategy, e.g. South para 170. This appears to relate to the draft SPG on Sustainable Design and Construction, 2005. However there is no requirement in the London Plan for London boroughs to include renewable energy targets in their development plans (Policy 4A.7-10).

- 20 A further instance may be:

- Boroughs should identify suitable sites for renewable energy schemes (e.g. West para 179). Although this is consistent with London Plan Policy 4A.10, it appears to go further than PPS22 (published since the London Plan).

Updating policy

- 21 In relation to the second category above, the draft SRDFs provide a useful purpose in assembling updated information and research results produced since the London Plan was published in February 2004. However it is a fine line between drawing out the implications of this updated work, and promoting policy extensions as a result of it. Clearly any changes in policy would need to be included in revised statutory documents in order to be subject to full public consultation and independent testing.
- 22 The most important contextual change is probably the revised employment forecasts. This has implications for the amount of industrial land needed, and the number of town centres and Opportunity Areas that can realistically expect to attract office uses. Two instances where there appears to be an attempt to extend policy are:
- encouraging boroughs to consider structured land release from the East London Strategic Employment Locations (programme release of industrial land, including in SELs, para 45, 148, whereas London Plan Policy 3B.5 clearly sees them as a strategic reserve, with possible release from other industrial areas outside. This appears to be trying to implement draft SPG on Industrial Capacity 2003.
 - warning of possible changing guidance on the office component within Opportunity Areas, particularly Greenwich Peninsula, in East London, Annex 4 Table 2B.2 - consultants now consider this to be a marginal office location. This would change Opportunity Area guidance in London Plan, para 5.79.
- 23 Since the publication of the London Plan there has been an increasing imperative to find additional housing capacity in part because of the Government agenda, influenced by the Barker review. Hence locational pointers on where this might be found in Part 2, Chapter 2 of the draft SRDFs are very useful. There is also emphasis on increasing densities. This takes forward London Plan Policy 4B.3, but strangely only in Central London is this linked to the Sustainable Residential Quality matrix, Table 4B.1.
- 24 A possible instance where there is an attempt to extend policy is the recommendation for:
- LDFs to refuse developments for underuse of land as a consistent proposed action in Chapter 5 on Development Tools. This goes further than London Plan Policy 4B.3.
- 25 An area of uncertainty is in relation to changes to the town centre network. All draft SRDFs contain the statement that "The town centre network as set out in Annex 1 will be reviewed in light of strategic assessments of need and capacity, town centre health checks, strategic and local objectives" (proposed actions 2B). North London adds "following consultation on this draft" to the beginning of the sentence (proposed actions 2A). Central London invites Boroughs and other stakeholders including the GLA to test the potential changes (proposed actions 2D). The analysis in some already identifies possible changes to the network based on recent health check/trading information. This derives from London Plan Policy 2A.5 and para 327 which are unclear as to how any changes would be taken into policy. In West London is it said that changes to the town centre network are likely to be made through SPG (West London, para 115). Based on experience of Regional Spatial Strategies outside London, any changes should be through a statutory policy document ie through the London Plan review.

5 VALUE ADDED

Content

- 26 The draft SRDFs are judged to be a useful addition to London's framework on the following 10 criteria, but with some provisos.
- 27 **Descriptive background:** They provide a useful summary of the characteristics of each sub-region, similarities and differences, of the issues they face internally, and the pressures or influences from developments happening close to their boundaries outside.
- 28 **Vision:** Some have been more successful than others in setting out a vision for their sub-region (Part 1) -- North and Central London. Developing "a shared sense of purpose" (West London Alliance, 14 July Committee report). It is noted that the strategic directions are included for debate during a "discussion period" (Introductions), presumably being mindful of their status.
- 29 **Monitoring:** A useful means of incorporating data from London wide research published since the London Plan¹. Useful information consistently presented on a baseline for monitoring industrial land release, additional comparison and convenience floorspace projections, housing capacity in Opportunity Areas as a proportion of the London Plan target for that sub-region. Presentation in this way makes it possible to focus on common patterns and trends within a particular part of London. This should encourage Borough planning officers to liaise with neighbours on common issues. There is a common action to invite views on sub-regionally distinct indicators to refine and target the existing London Plan based monitoring process (Part 1 core action).
- 30 **Signposting role:** Useful cross-references to other strategies and supplementary guidance by members of the GLA group. Also useful indication of ongoing and future work at the sub-regional scale, including sub-regional economic development implementation plans being prepared by the sub-regional partnerships funded by the LDA, sub-regional transport network plans and road network corridor plans to be prepared by TfL, possible sub-regional community strategies. The Mayor is to convene annual sub-regional monitoring meetings to assess progress.
- 31 **Coordination of policy:** All draft SRDFs have recognised their permeable boundaries. Strategic diagrams in Part 1s are useful at identifying external linkages. All 4 SRDFs covering outer London identified issues where a coordinated approach is needed with the adjoining Regional Assemblies and/or local authorities. No specific priorities emerge from this, or ways of tackling them. For example issues in South London include seeking compatibility on housing densities, encouraging more sustainable forms of commuting, positive management of the Green Belt/urban fringe, consistency of approach to town centre development and car parking (21).
- 32 **Definition of sub regional boundaries:** "Flexible" concept of sub-regions (London Plan, para 5.2). There were fears expressed at the London Plan EIP about the initial definition of boundaries. As debated at the EIP, Central London is the most problematic, in terms of excluding the City. But Wandsworth and Richmond also acknowledged to have an interest in more than one sub-region. The hinterlands of key Opportunity Areas also in more than one sub-region, namely Stratford, and Wembley/Brent Cross/Cricklewood

¹ Some examples are the Interim Borough Employment projections by GLA Economics 2005 to be finalised in autumn 2005; London Property Research on the office market 2004; town centre health checks 2004, retail projections by Experian 2004, hotel study by PWC 2004.

(Panel Report, paras 3.3-3.5). Intention was that relevant Boroughs would participate in the preparation of neighbouring SRDFs/partnerships (Panel Report, para 3.6). This coordination appears to have happened from the 14 July evidence. Presentational devices have been used to indicate this permeability (see Annex D). The Mayor's foreword says he has become increasingly convinced that boundaries are not drawn in the best way to support joint working between Boroughs and other agencies. This is identified as a common issue for the London Plan review in each Annex 5. Invitations are also given to express views on the boundaries of the Central Activities Zone (East London, 119/120), Central London questions 2A).

- 33 **Integration:** Provides a useful start on the wider issues that have not previously been within the remit of land-use plans, but are now encompassed within spatial plans, e.g. education and health. Transport information was apparently late and is very general. Information provided on health and education is variable (see Annex C) and is largely descriptive. Further work needed to identify land requirements. Further work also needed to make the actions more sub-regionally specific.
- 34 **Practical implementation:** A useful start but less successful than the descriptive functions, because so many of the proposed actions are similar, despite the different spatial contexts. Those in Central London are the most distinct, not surprisingly.
- 35 **Guidance for LDF preparation:** The SRDFs contribute to the evidence base from which London Boroughs will prepare their LDF policies. This is useful in two ways -- first, they are a ready supply of up-to-date intelligence and data, and second they give a wider spatial perspective than may previously have been available. Material that should be useful for LDF preparation includes:
 - Work on possible roles for town centres within the wider network, and identifying those with potential for additional office and hotel development should be useful starting points.
 - The SRDFs raise awareness of capacity issues (reconciling supply and demand), e.g. locations where more housing capacity might be sought, and on the downside guidance on managing reduced demand for offices and industrial land in certain locations.
 - Consistent information on Opportunity Areas and Areas for Intensification should have assisted in identifying issues to be taken forward at a more local level (unless these were already well advanced e.g. King's Cross Central).
 - The SRDFs highlight the importance of some new issues, e.g. flood risk assessment, sustainable design and construction, renewable energy where the national and London wide agendas have moved on since the London Plan was prepared.
 - Overall, the SRDFs should assist the speed with which core strategies and area action plans can subsequently be produced by those Boroughs with limited forward planning staff resources. See also comment below about capacity building for informed community involvement in LDF preparation.
- 36 **Identifying possible issues for the London Plan review:** Most issues raised in the final Annex of each draft are similar. Some will be covered in forthcoming Alterations to the Plan e.g. policy implications from the new Housing Capacity Study, and waste provision. Those issues for a future review include runway capacity in the South East, climate change, and in 3 of the drafts the Olympics (not North or South). But there are sub-regional components e.g public transport, ideas for possible new OAs and AIs. But improvements could be made to the presentation of Annex 5, as issues for LDFs and the London Plan are interwoven.

Risks of SRDFs

- 37 There remains some concern that these SRDFs stray into Borough roles. There was a concern at the time of the EIP that they would merely be adding another tier to the planning system. This aspect is covered in the Alignment section and Annex B on status.
- 38 In addition they identify more and more issues for the Boroughs to deal with, e.g. preparing BME and SME business development strategies with the LDA, LSC and Business Link, and action plans to support a bottom up approach to community-led regeneration.
- 39 Do they add value to existing plans and strategies? Some of the proposed actions are very obvious, e.g. East London paras 31, 50 6, 91 and 90. Some of these actions are statements of existing practice, e.g. North London 2E2, page 37. Some of the actions include rather vague concepts for example encouraging “collaborative development consortia”.

Process

- 40 There are 2 main advantages from the process of preparing SRDFs as evidenced at the 14 July Committee. They were considered to be a useful learning experience:
- in helping sub-regional partnerships in particular understand the distinct issues facing their sub-regions and possible courses of action. Also raising awareness amongst local groups about what the planning system can hope to influence, hence making it more possible for them to have an effective input into the LDF preparation process (London Forum, 14 July Committee). Engaging stakeholders in the evolving strategic planning process, and bringing them more together (particularly in the case of North and South London where sub-regional partnerships have only been formed recently. Also has spinoffs for the ongoing work on Sub-Regional Economic Development Implementation Plans
 - in informing GLA officers on what is happening at local level hence leading to the identification of possible issues for the London Plan review.

Finalising the SRDFs

- 41 There are 2 areas where an assurance should be sought that final SRDFs will not exceed their remit:
- Areas suitable for tall buildings (consistent with Policy 4B.8 to use the SRDF process for this). But the SRDFs say that any "agreed" locations would be included in final SRDFs unless it is felt that general guidance in the London Plan and SPG is sufficient leaving the detail to be included in LDFs. But the point is "agreed" by whom? It is considered more appropriate for a Borough to consult through their LDF preparation (or SPD if linked to a saved policy). This affects property rights, and the Mayor's Views Management guidelines are still in draft!
 - Findings of the new Housing Capacity Study to be "summarised". This would be acceptable as long as policy requirements are not drawn from them. In other regions of the country, there would be no change to housing targets without a draft RSS being tested at EIP. However the first proposed action in the housing section (1A) is consistently that Boroughs be asked to or "should" programme release of the identified capacity in the new Housing Capacity Study. Theoretically this prejudices the results of the forthcoming EIP into the first London Plan Alterations. Central London, para 121 says that more detailed guidance on implementation will be in SPG.
- 42 Other issues involved in finalising SRDFs are covered in Annex B.

CONSISTENCY OF TREATMENT OF SUBJECT AREAS

This Annex compares the consistency of the five SRDFs with each other under the relevant subject headings. Instances where additional technical information is given in certain documents is tabulated in Annex C.

Subject areas are covered in the order in which they appear in most of the documents. Although the chapter structure is consistent, there are minor variations in the order of some subheadings within chapters, e.g. industrial land supply/capacity is earlier in Chapter 2 in Central London than others.

(References in brackets are to paragraphs or annexes within the specified draft SRDF).

1 Quantifying sustainable growth

Housing

Similar analysis and monitoring information provided. Consistent conclusions reached about the need for more affordable housing, including more family housing (evidence on this is not really given).

Conclusions about where additional capacity may be found are quite rightly sub-regionally specific, e.g. release of industrial land likely to make a greater contribution in East and North. Even though it is suggested that there could be potential in South, no action arises.

Employment

All drafts refer consistently to the GLA Economics interim borough employment projections as revising downwards the Volterra forecasts used in the London Plan.

Offices

Each draft comments on the relationship between current supply including the development pipeline, and assessed demand through revised interim employment projections. Coupled with the results of the latest London Office Policy Review (LORP) this allows conclusions to be drawn about the strength of different centres in attracting future offices. This takes account of the waning attraction/ structural failings of the outer London office market. This translates into a series of "Office actions" in the town centre tables (previously called Broad Office Policy Actions in East London -- altered taking account of Status considerations?). This exercise is dealt with consistently (Annex 4, Table 2B.1 East, Table 2C.1 Central, Table 2A.1 North, West and South).

However in East London it is fed through into implications for the Opportunity Areas with a final column in Table 2C.1 headed Indicative employment change of London Plan. This risks altering policy guidance in the London Plan (see Alignment sections).

Note no figures are given on office capacity in South London.

Proposed actions on how this translates into possible change of use in the section on Mixed Use Development in Chapter 5 is appropriately tailored to the characteristics of each sub-region.

Industry and Warehousing

Each draft compares likely supply and demand for such land, and indicates the monitoring baseline for release of industrial land (thought to be from draft SPG on Industrial Capacity, 2003, although not clear). Boroughs have apparently previously been categorised in terms of Restricted, Limited release etc. In some cases changes are suggested to this Borough classification, e.g. Redbridge (East London, 106).

All drafts invite comments on possible Strategic Logistics Parks and Locally Significant Industrial Sites. Some suggest broad locations already.

The implications of any potential oversupply of capacity for employment growth are picked up in the Housing advice.

Most include reference to the possible need to consolidate London's wholesale markets. Yet background reference is to a report in 2002, i.e. before the London Plan was finalised.

Retail and town centres

Consistent information is provided on forecast comparison floorspace required. Data are also given about the development pipeline. Similar information given for convenience floorspace, although acknowledged to be more a borough concern. Where the pipeline for convenience goods has a high proportion out of centre (North, West, South), the suggestion is made to reconsider this in the light of the sequential test. This is accepted national policy.

The importance of street markets is acknowledged in several, particularly Central London (51), with appropriate proposed action.

The data on comparison and convenience floorspace is brought together in a consistent form in Annex 1 tables. This identifies "residual growth" which Boroughs should consider distributing -- consistent proposed actions, although the Mayor gives his consistent views that it should go to the upper levels of the network. A "Commentary" about planning implications is provided as the last column -- unclear whose comments these are.

There are minor differences in the way that the need for further work on reconciliation of retail need and capacity is introduced. In West London for example partnership working is envisaged ("Boroughs and other stakeholders are invited to join with the Mayor in identifying areas where reconciliation of retail need and capacity requires coordination". In South London it is stated that "The Mayor will continue to consider areas where reconciliation" (in both cases proposed actions 1C).

Culture, Leisure and Tourism

Consistent data on primary and secondary locations for hotels. Not all SRDFs have a proposed action indicating that LDFs should indicate how this hotel capacity should be brought forward (not Central London or West).

Proposed actions are tailored to the characteristics of the sub-regions. For example Strategic Cultural Areas are mentioned for Central and West London, and cultural quarters in North London. Principles for the night-time economy are elaborated in Central London, because of its importance here. Elsewhere references are made to diversifying the offer in certain places, linked to existing supply and forecast spend.

Social Infrastructure

It is acknowledged to be the first time that such information has been assembled. It appears that whatever information was to hand was included. All sub-regions except East London have some form of tabular information about future proposals. This falls short of identifying precise land requirements. In many cases extension or reconfiguration of existing premises is envisaged, together with new primary care treatment within major developments.

Little information is so far included on educational land requirements. Little information on schools. Further information promised when review of secondary schools completed in autumn 2005? Information on new academies proposed only in North London. Inconsistency in overall number of new Academies proposed (Central says at least 50, para 91, East London about 60 (76).

Variable information on Higher and Further Education requirements. Some indicate expansion of existing institutions, e.g. Kingston University in South London (68).

Variable information on need for more places for post-16 skills provision (most detailed 2,500 places in South London, para 72).

Central and West London indicate additional student beds required (97 and 72 respectively).

East London Table 2.1 indicates primary and other healthcare sites, and higher education sites are known, but these are not indicated in the document.

Childcare is dealt with consistently. All drafts include numbers of under fives and expected growth rates, and indicate proportion of existing children provided for. Only in North, West and South London is the importance of play provision and home zones mentioned.

Infrastructure services

There is a consistent description of the adequacy of existing utilities (high-pressure gas, electricity distribution). More details in Annex 2 in terms of Opportunity Areas etc. Similar proposed actions on telecoms, but only the East mentions how best to provide the next generation of broadband (91).

Inconsistent conclusion reached on water supply. North (89) and South (83) indicates water supply is OK if the Beckton desalination plant goes ahead. Central London guidance is that Thames Water should focus on water efficiency and reducing leaks rather than pursue the desalination plant (106). There is no explicit reference to water supply in East London, only that there are no sub-regional issues on water or sewage (96).

Consistent proposed action on using flood risk assessment, e.g. Central London (108). Recommendation for a strategic flood risk assessment in North London (91).

Consistent treatment of waste with reference to the forthcoming London Plan Alterations. An interim development control policy is included not to release industrial land without considering potential for waste management facilities (see Alignment section).

Consistent treatment of additional land needed for public transport. Specific needs are highlighted in Central, West and East London, but the subject is largely left for forthcoming SPG. No sub-regional comments made in South London (86)

2 Allocating growth spatially across the sub-region

Land Needs

Consistent data is given on existing housing capacity identified within Opportunity Areas and Areas for Intensification compared with the London Plan guidelines for each sub-region (Chapter 5). Estimates are given of maximum capacity from release of industrial land e.g. West London. Consistent proposed actions that densities will have to rise.

Similar information is given on existing capacity for employment growth in the Opportunity Areas etc compared with London Plan forecasts (e.g. West London, 103).

Central Activities Zone

Largely dealt with in Central London, although common table of possible monitoring indicators also included in East. Little information on Central Activities Zone (CAZ) boundary, despite intention to cover this (London Plan, para 5B.1).

The intention is to have a common Annex on the CAZ in the final Central and East London SRDFs.

Opportunity Areas and Areas for Intensification (Chapter 2 and Annex 2)

A consistent format is used to bring information together and illustrate indicative working boundaries. Greater detail in East London in that most Areas include an extra box on Capacity linked to accessibility and planned public transport improvements. Some Areas in East also include some phasing information about homes and new jobs. In no case is there any attempt to fill in emerging revised capacity estimates.

Another difference is that all SRDFs except Central London indicate the importance of spreading the benefits of Opportunity Areas to the surrounding hinterlands. All except Central London contain a proposed action seeking views on whether the boundaries of Opportunity Areas should be extended to include their hinterlands. Only East London contains a plan indicating possible extended boundaries.

Suburbs

A consistent description of challenges is given, and encouragement to use the Sustainable Suburbs Toolkit. Additional sub-regionally specific actions in Central London to deal with the challenges of inner suburbs.

Boroughs are asked to consider locations for selective intensification in North London (proposed actions 2C) and "should" consider such locations in South London. No such references in East or West London.

Industrial Locations

A consistent description is given of Strategic Employment Locations (SEL) as a strategic reserve, and consistent proposed actions in all except East. Proposed action to consider structured release from some SELs in East -- see Alignment section.

Transport accessibility

Consistent description is given of the current network and proposed improvements. Useful updating of schemes. Similar identification of challenges, e.g. surface access to airports.

Consistent proposed actions. All contain a consistent map from TfL showing accessibility improvements and 45 minutes isochrone (difficult to read). Consistent treatment of land use and development. East, Central and West London all indicate the need to coordinate opportunities arising from Crossrail through a masterplan approach. Consistent treatment of managing demand and actions arising.

Consistent treatment and proposed action on sub-regional freight quality partnerships. More detail in East on implications of new river crossings. Useful diagram linking industrial land release with railfreight access in East London (Figure 1G.1). Relevant sub-regional references to water transport and wharf safeguarding.

Consistent proposed action that TfL will produce a sub-regional transport network plan.

3 Ensuring development brings benefits to communities

Sustainable local economies

Consistent descriptions of sub-regional characteristics, and data included, including ethnic mix. Consistent proposed action on improving access to jobs from deprived areas. North London has an additional diagram on spatial concentration of diversity.

Securing economic and social inclusion

Suggestion for an overall sub-regional community strategy to provide context to Borough based Local Strategic Partnership strategies. East and West link proposed community actions to health. East has an additional map showing percentage under 19 year olds on jobseekers allowance.

4 Ensuring development improves the environment

Conservation, design and the public realm

Section on public realm initiatives is better fleshed out in Central and West than others. Similar actions however.

Sustainable design and construction, and energy

Identification of those sources of renewable energy most appropriate to the sub-region. Only East and West have a proposed action on Eco-Homes standards. Similar actions on site finding and renewable energy targets -- see Alignment section. Similar references to Energy Action Areas.

Air quality

Similar level of detail and proposed actions.

Open Space

Similar identification of areas of deficiency, with consistent maps in Annex 4. Area specific information about e.g. the Green Grid and the Green Arc project.

Blue Ribbon network

Consistent level of information and has good sub-regional detail. Actions related to sub-regional challenges and characteristics.

Statements on development within the natural floodplain in East London (particularly paras 220-223) should be checked against national policy guidance in PPG 25.

Wildlife and biodiversity

Consistent actions. Reservations on requirement for a “net increase” in wildlife habitat from all development - see Alignment section. South London has no diagram on ecological and landscape zones. Central London has expanded action on how to achieve greater access to nature (proposed actions 4F) -- more appropriate in SPG?

5 Managing the development tools and processes

Density

Consistent comments about recent Borough performance, drawing upon Table in Annex 4, apart from the time periods given in the first table on densities achieved. North and South include comments about respecting the suburban environment, and opportunities for selective intensification (see Consistency section). Only Central London has reference to Sustainable Residential Quality (SRQ) matrix (proposed action 5A). No mention of taking forward plot ratios in Central London, as suggested in the London Plan para 5.27.

Inconsistency in the way housing density actions are phrased, in that only Central London includes a proposed action relating to the SRQ matrix in the London Plan (Table 4B.1). However this guidance was intended to inform policy and practice in all parts of London (London Plan para 4.45).

Housing mix

Confusing reference to requirements in North London (198) - "The numbers of larger units is well below the London-wide requirement that 70% should be in 3 bedrooms or larger and 42% should be 4 bedrooms or larger". East London states that "The GLA's housing requirements study indicates that London wide for the next 10 years, to meet both projected population growth and the backlog in net housing need, 30% of new provision should be 4 bedrooms or larger....." (232). The other three SRDFs give less detail.

Same action throughout on how to achieve more large units but the justification for this is not linked to any tabular material in Annex 4.

Additional information in North London on elderly, gypsies.

Mixed use and changes of use

Consistent description of benefits, possibilities of partnership action including CPO, need to upgrade quality of office floorspace with opportunities to release. More specific information given in Central London, including possible extension of housing increment policy (242) – see Alignment section. Criteria and locations for change of use outside the Central Activities Zone (243). Detail varies on guidance on scope for consolidating and upgrading office floorspace.

Tall Buildings

Consistent description of the Mayor's draft View Management guidelines and common action inviting suggestions on areas suitable for tall buildings. Text differs on how this information will be used. Some suggestions for broad locations are given in Central (245), West (209) and South (193) – see Alignment section.

Additional Presentational Points

Foreword	Broad consistency with some sub-regional flavour
Presentation	References as footnotes in East London. Listed at end of text in others. Part 1 has title (Identity and overall direction for sub-region) in only North and Central London. List of abbreviations only included in North London.

STATUS OF SRDFs

SRDFs are not thought to be referred to specifically in the Greater London Authority Act 1999, Spatial Development Strategy Regulations and GOL Circular 1/2000. The GLA Act, section 30 says that the Mayor can produce and adopt Supplementary Planning Guidance (SPG). There are no legal powers explicitly in the Planning and Compulsory Purchase Act 2004 for the Mayor to produce Development Plan Documents, ie documents with statutory status within a Local Development Framework.

The London Plan, Policy 5A.1 commits the Mayor in partnership with stakeholders to bring forward SRDFs for implementing and developing the policies in the Plan.

The Introductions to the draft SRDFs stress that the documents are not a mini London Plan. They are non-statutory guidance. They contain new information to inform the implementation of existing, published policy. They are not SPG, or Supplementary Planning Documents (SPD) under the new system.

The Introductions to the draft SRDFs say they are consistent with the London interpretation of national Planning Policy Statement 11 (PPS 11) on Regional Spatial Strategies (RSS). This is accepted. Relevant references are:

- A sub-regional approach to spatial policy development may be required where functional relationships exist across administrative boundaries. (The second circumstance noted which is where a strategic policy deficit cannot be addressed by general RSS policies is less relevant because London SRDFs are not intended to provide policy) (para 1.13).
- Exceptionally it may be necessary to have a non-statutory sub regional framework to address issues that cut across regional boundaries and to aim to make longer term development more coherent (para 1.15).
- RPBs to develop an implementation plan (para 3.2). The plan can then be built upon to promote published spatial strategy. Could identify priorities with all parties (para 3.3). Monitoring requirements (para 3.4-3.5).

Outside London, any draft sub-regional framework that was intended to produce new policy would be examined in public before adoption. Once adopted it would become part of the relevant RSS(s).

The Introductions to the draft SRDFs also imply consistency with PPS 12, Local Development Frameworks. Characteristics of SPDs are that they:

- i) must be subject to "rigorous procedures of community involvement" (para 2.42)
- ii) can include thematic and site-specific issues (para 2.42)
- iii) can be used to provide further detail on development plan document policies (para 2.42)
- iv) must not be used to allocate land (para 2.42)
- v) are subject to Sustainability Appraisal incorporating Strategic Environmental Assessment (SA/SEA) (para 4.41).

The SRDFs fail criteria i) and v), so the Mayor's Office is correct in not ascribing them with SPD status.

Criteria iii) and iv) are useful in judging whether the draft SRDFs have gone further than would be expected. The Alignment section above indicates several places where there are attempts to extend London Plan policy.

As recognised in the Introductions, the SRDFs should not include new policy or policy extensions. Herein lies a tension. The London Plan EIP Panel considered that it was inevitable

that the SRDFs would contain new policy or additions to policy (Panel Report, para 3.20), simply because it was expedient to seek adoption of the London Plan without time to fully elaborate the sub-regional dimension. Indeed it is stated clearly in the London Plan that the SRDFs should extend policy on certain topics, e.g.

- SRDFs to develop a robust strategy for town centres and provide strategic direction for the development of the network of centres taking account of relationships with adjoining sub-regions and outside London (London Plan, Policy 2A.5);
- Centres can be reclassified in the light of health checks through SRDFs and subsequent review/alteration of London Plan and UDPs (para 3.227), i.e. the status of SRDFs is left unclear;
- SRDFs to assist in comparing supply against need for additional retail on a sub-regional basis (para 3.228). Reconciliation of assessments of capacity and need through SRDF partnership working and area planning frameworks (Annex 1, para 6);
- SRDFs to provide more specific policy direction for some individual centres, e.g. where necessary to support local and strategic objectives, e.g. future change in functional classification or development of strategically significant specialist role in order to take this into account in the London Plan review (Annex 1, para 7);
- SRDFs to develop the approach to mixed-use development (London Plan, para 3.125);
- the sub-regional distribution of population growth in Table 5A.1 to be tested in SRDFs (para 5.7).

Hence the Panel recommended that they should be treated as Development Plan Documents, and placed on deposit (Panel Report, Recommendation 3.7), i.e. subject to full consultation and testing through an examination. This was not accepted by the Mayor's Office.

There are minor variations in how Annex 2 and Annex 5 are introduced at the end of the SRDF text. It appears to reflect more detailed consideration of Status issues. Earlier draft SRDFs e.g. East London refer to Annex 2 setting out for "consultation" the key issues, initial indicative working boundaries and capacity estimates in each of the Opportunity Areas, Areas for Intensification and Strategic Employment Locations. Later versions, e.g. North London say Annex 2 sets out for "discussion" the key issues in each of the Opportunity Areas, Area for Intensification and Strategic Employment Locations that need to be addressed in the planning frameworks for those areas.

The earlier drafts say Annex 5 lists potential issues that have arisen which may need to be "included" in the review of the London Plan and preparation of LDFs. Later versions use the word "considered" in the review of the London Plan and preparation of LDFs -- this more appropriately recognises their non-statutory status.

Subsequent use of the SRDFs

The Introductions say that the documents will be a material consideration for stakeholders. (This translated into a firmer role at the 14 July Committee, i.e. a material consideration in decision taking and LDFs.

The Introductions say that "in themselves" they will have no bearing on the general conformity of UDP/LDF policies (i.e. they should not be prayed in aid by the Mayor's Office in seeking amendments to draft LDF policies). Instead they are intended to illustrate how both could complement each other.

Finalisation of the draft SRDFs

Consultation responses will clearly need to be taken into account. This could involve some controversial issues, such as:

- areas for tall buildings
- CAZ boundaries (Central London, 134)

In addition it is unclear how updated information will be incorporated without giving stakeholders a chance to comment on its implications, including:

- findings from the 2004 Housing Capacity Study (Central London, 121)
- incorporation of revised capacity estimates for Opportunity Areas and Areas for Intensification
- Strategic Flood Risk Assessment to inform final East London SRDF (219).

CONSISTENCY OF TECHNICAL DATA AND GRAPHICS

	East (May 05)	Central (July 05)	North (July 05)	West (June 05)	South (June 05)
Housing					
<ul style="list-style-type: none"> London Plan target 	Given as 1997-2016, although not made clear (39)	Given as no. per annum (29)	Not quoted (39)	Given as 1997-2016 (37)	Quoted 2001-2016 as in London Plan (33)
<ul style="list-style-type: none"> Historic density 1995-1998 data given consistently 	2000-2003 (Table 5A.1)	1999-2002 (Table 5A.1)	1999-2002 & 2000-2003 (Table 5A.1)	2000-2003 (Table 5A.1)	1999-2003 (Table 5A.1)
<ul style="list-style-type: none"> Additional analysis 			Average house prices by Borough (Annex 4, Table 5B.3)		
<ul style="list-style-type: none"> Additional guidance 	Density/phasing diagram (Diagram 1A.1)				
Employment					
<ul style="list-style-type: none"> Additional analysis 		Origin of sub-regional workforce (Annex 4, Figure 1B.4)			Origin of sub-regional workforce (Annex 4, Figure 1B.1)
Offices					
<ul style="list-style-type: none"> Additional guidance 	Factors for consideration in review of balances in mix of uses in OAs & IAs (Annex 4, Table 2C.1)				
<ul style="list-style-type: none"> Additional analysis 			Supply and demand for offices (Annex 4 Table 1B.4)		

Retail • Additional analysis		Origin of shoppers in the West End (Annex 4, Figure 1D.4)			
• Additional guidance		Potential principles to support West End renewable (Annex 4, Table 1D.5)			
Culture, Leisure and Tourism • Additional guidance		Strategic Cultural Areas: indicative locations (Annex 4, Diagram 2A.1) Draft management principles for the night time economy (Annex 4, Table 1F.2)			
Health • Link with urban design	Yes, including obesity (69)			Yes, including obesity (60)	
• Health indicators	General comment only (70)	General comment on variation across sub-region (81)			Sub-regional characteristics given (56)
• Facility needs	No detail. Misc primary care and other care sites "known" (Table 2.1)	Major hospital and other health-related proposals (Annex 4, Table 1G.1)	LIFT health schemes (Annex 4, Table 1E.1)	Major hospital improvements (Annex 4, Table 1E.1)	Major hospital and other health facility proposals (Annex 4, Table 1E.1)
Education • Schools			New Academy proposals (72)		
• H&FE		Student bed needs (97)	New FE College proposal (78)	Student bed needs (72)	

• Skills					Extra places for post-16 skills provision (72)
• Childcare			Link to play and home zones (82)	Link to play and home zones (77)	Link to play and home zones (75)
Utilities			No mention of heat distribution		
• Energy					
• Telecoms	Mentions how best to provide for next generation of broadband (91)				
Industry and Warehousing	Quality of freight access and suggested release or retention Thames Gateway London (Figure 1G.1)				
Opportunity Areas	OAs and their suggested hinterlands (Annex 4, Map 2.1)				Text on Other Growth and Regeneration Areas (Annex 4, Table 2B.1)
Communities	% <19 year olds on jobseekers allowance (Map 3.1)		Spatial concentration of diverse population (Annex 4, Table 3.5)		
• Additional analysis					
Open Space	Green Grid framework (Annex 4, Map 4.4)				
• Area specific					
• Green Arc	Strategic Zones (Annex 4, Map 4.3)		Strategic Zones (Annex 4, Map 4D.3)	Initial Project Area (Annex 4, Map 4D.3)	Initial Project Area (Annex 4, Map 4D.3)

Biodiversity					No Main Ecology And Landscape Zones map
Preparation process			List of community and stakeholder workshops held (end Introduction)		

RECOGNITION OF EXTERNAL AND INTER SUB-REGION INFLUENCES

	East (May 05)	Central (July 05)	North (July 05)	West (June 05)	South (June 05)
Strategic Direction, Part 1	Thames Gateway as national regeneration priority (11)	World city and London mega city region (15)	Strategic hub in networked city (16 and Diagram 1) Spreading benefits of Olympics (17) Access challenges of LSCP growth area (21)	Contextual relationships with Western Wedge, Central, East (13). Further work needed on e-related activities in Western Wedge (30)	Croydon-Gatwick-Brighton corridor, Bluewater, Ebbsfleet influences (20)
• Diagrammatic representation		Linkages with other SRDF areas (Diagram 3)	Relationships with airports and Lower Lee Valley (Diagram 2)	Opportunities of Western Wedge and A1/M1 Corridor (Diagram 2)	Opportunities of Croydon-Gatwick-Brighton corridor (Diagram 2)
• Policy coordination	Issues for coordinated approach with EERA, SEERA, Dartford and Thurrock (31)	Cross boundary issues with other regions (26)	Issues for coordinated approach with SEERA and EERA (18)	Issues for joint approach with SEERA (30)	Issues for coordinated policies with SEERA (21)
• Common action	Use SRDF and RSS consultation processes to improve coordination of cross boundary issues (Part 1 core action)				
Central Activities Zone	Acknowledge influence, but detail in Central London	Opportunity to test how far CAZ can accommodate growth pressures (129). Will be common Annex with East in final SRDF (135)			
• Diagram	CAZ Diagram (Figure 2.1)	CAZ Diagram (Diagram 2.1)			

<ul style="list-style-type: none"> Common action 	Invite views on boundaries (East 119, Central question 2A) and uses (East 120, Central question 2A)				
Retail <ul style="list-style-type: none"> Pipeline in other sub-regions, but nothing outside Greater London 	Table 1C.3	Table 1D.3	Table 1C.3	Table 1C.3	Table 1C.3
Utilities <ul style="list-style-type: none"> Water supply 			Acknowledge Beckton desalination plant (89)		Acknowledge Beckton desalination plant (83)
Industry and Warehousing <ul style="list-style-type: none"> Strategic Logistics Park 	Liaise bordering authorities in identifying, and wider warehousing needs (108)		Liaise Herts and Essex (98)	Liaise authorities outside London with M25/Heathrow access (98)	
Opportunity Areas		Includes strategic objectives for OAs in East London close to its boundary (Annex 2)	Repeats material on Lower Lee Valley from East London, excluding indicative phasing and emerging revised capacity table (Annex 2)		
Transport <ul style="list-style-type: none"> New facilities and management 	Encourage feasibility study of Lower Thames Crossing (178)		Challenge of increasing public transport use to Stansted & access to LSCP (135, 139)	Challenge of increasing public transport use to Heathrow (134-137)	Challenge of increasing public transport use to Heathrow and Gatwick (129-133)
<ul style="list-style-type: none"> Inter-regional studies 				Commuting patterns with Thames Valley under review with SEERA (138)	Commuting patterns with under review with SEERA (135)

Air Quality				Coordinated approach to management of Heathrow effects (184)	
Open Space • Green Arc	Encourage partnership working (211)		Work to promote positive uses (182)	Work to identify vision and possibly apply to North West London (191)	Encourage partnership working (177)
• New Regional Park			Area of search (Annex 4, Map 4D.1)		Area of search (Annex 4, Map 4D.1)
• Area specific	Green Grid not shown extending beyond London boundary (Annex 4, Map 4.4)				Opportunity to manage South East London Green Chain largely falling in East London as Regional Park facility (173)

