

Response to London Plan Annual Monitoring Report 19 March 2023 proposals

Submitted by London Forum of Amenity and Civic Societies January 2022

The GLA's AMR document's paragraph 1.1.2 explains the legal requirement for the Mayor to publish an AMR. That demonstrates the failure of the Mayor to publish any AMRs since the one for 2018-19 which means that, apart from what one can glean from the GLA Datastore, it is not known whether or not the 2016 London Plan's twenty-seven Key Performance Indicators (KPIs) have been achieved in recent years.

London Forum insists again that the outstanding AMR 17 for 2019-2020 is published soon and AMR 18 for 2020-2021 is issued by June this year. That is a timescale which used to be achieved.

The consultation states that AMR 19 for 2022-2023 will be published in March 2023 which would be a major improvement in timescale. Also, the document states that work is being carried out on a new SHLAA and information on Opportunity Areas, both of which London Forum welcomes.

Chapter one of the document gives details on how the twelve KPIs of the March 2021 London Plan will be measured

KPI 1 'Supply of new homes' is to be monitored by housing completions, the net pipeline of approved homes and their percentage by type, tenure and borough for meeting 66,000 net additional homes each year. **There needs to be some measure of the period before approved homes are built.**

KPI 2 'Supply of affordable homes' is to be monitored and reported on a comprehensive range of measures. London Forum expects that will cover each type of affordable home with comparisons to the SHMAA and the Mayor's affordable housing and viability guidance.

KPI 3 'Supply of office capacity' is to be measured by the pipeline of planning permissions for office floorspace being at least three times the average office floorspace construction started over the previous three years. **That trebling of office floor space is not supported by any explanation and needs to be compared with the targets in the Mayor's Economy Strategy.**

KPI 4 'Supply of affordable workspace' is to be measured by a positive trend in affordable B1 workspace as a share of total B1 floorspace in planning approvals (based on a rolling average). **London Forum does not think "positive trend" is enough and there should be targets.**

KPI 5 'Availability of industrial land' is to be measured by no overall net loss of industrial and warehousing floorspace in London (LP Policies B1c, B2 and B8) in designated industrial locations (based on a rolling average). **That performance indicator has been undermined by Robert Jenrick's direction that policies for the protection of existing industrial floorspace should be removed from the London Plan.**

KPI 6 'Protection of Green Belt and Metropolitan Open Land' will be measured by the harm to the Green Belt and Metropolitan Open Land prevented through the referred application process on the basis of 'harm identified and refused', 'harm identified and approved' and 'harm not identified'. **How the latter is to be ascertained is not clear. The loss of any MOL should be reported.**

KPI 7 'Carbon emissions through new development' is proposed to be measured for those applications referred to the Mayor by an average on-site carbon emission reductions of at least 35% compared to

Building Regulations 2013 for approved referable development applications, less than that average and average carbon emission reductions.

Building Regulations need updating. London Forum suggests that the 35% is not sufficient.

KPI 8 'Modal share' is to be measured for Increasing mode share for walking, cycling and public transport (excluding taxis) towards the target of 80% by 2041 by recording the percentage of trips by each of those modes. **No comment.**

KPI 9 'Londoners engaging in active travel' **seems to be proposed to have just a limited measure for the provision of cycle parking spaces** for residential, non-residential and 'other'.

A "positive trend" in provision of cycle parking (based on a rolling average) is to support the target of all Londoners doing two ten-minute periods of active travel a day by 2041.

The measure seems inadequate for the target.

KPI 10 'Air quality' is to be measured by a positive trend in approved referable development applications demonstrating that they meet at least air quality neutral standard for emissions (based on a rolling average).

As with KPI 6 for protection of GB and MOL, this measure applies only to applications referred to the Mayor. There should be some reporting by boroughs on this subject and included in the AMR.

KPI 11 Impact of development on London's heritage is to be measured for a positive trend in the reduction of harm and/or an increase in benefits to designated heritage assets in approved referable development applications (based on a rolling average).

As with KPI 6 and 10, this measure applies only to applications referred to the Mayor. There should be some reporting by boroughs on this subject and included in the AMR.

KPI 12 'Provision of cultural infrastructure' is to be assessed on the basis of no net loss of culture venue and facility floorspace (based on a rolling average). It covers A4, D1, D2 and Sui Generis (theatres, nightclubs and casinos) uses. **Boroughs should report increase in cultural space.**

The following data will be separately monitored by **Opportunity Area**.

- Cumulative housing approvals and completions since OA designation
- % of housing approved as affordable housing
- Cumulative non-residential floorspace approvals and completions since OA designation
- % of Use Class E approved as affordable workspace
- OA planning policy mechanisms by OA developed during year
- Total % housing completed across London within an OA for every year since 2004, and by borough.

Those must relate to the forecast homes and jobs in the OA Planning Frameworks and LPA Plans.

There is no measure of the move of Opportunity Areas through the stages from nascent of planning and development that the London Plan describes.

There will be data provided on

- Referable application data (Stage, decision, borough)
- Referable application outcomes – any additional narrative we may want to include where outcomes for referable applications are distinct from applications generally

Plan making is to be monitored by

- Local Plan and DPD progress (by borough)
- London Plan Guidance progress
- GLA planning evidence base and data progress

The six Good Growth objectives in the March 2021 London Plan are to be monitored and reported upon **but there is no indication in the consultation document of the measures to be applied.**

There will be measures of 'Social value', 'Sustainable environmental performance' and 'Inclusive economic growth value' **but the data and narrative are not supplied.**

There will be links to further datasets but they are not specified.

Those parts of the AMR 2023 document imply that the latter parts of it had not been finalised before it was issued.

Paragraph 12.1.4 of the 2021 London Plan states "A comprehensive set of complementary and more detailed data and performance measures will sit alongside the KPIs in the AMR. Some of the KPIs from the previous Plan will be included and those time series therefore retained. Some policy areas are not covered by KPIs, but measuring trends for those areas covered by the Plan – including key planning-related social, economic and environmental issues - is important. Additional measures to be included in the AMR will be explored over time and this will be informed by engagement with relevant stakeholders in the process."

The 2016 London Plan KPIs that have been omitted in the latest London Plan are

- Maximise the proportion of development taking place on previously developed land
- Optimise the density of residential development
- Minimise the loss of open space
- Reduce the difference in life expectancy between those living in the most and least deprived areas of London
- Increase in the proportion of working age London residents in employment
- Reduce the employment rate gap between Black, Asian and Minority Ethnic (BAME) groups and the white population
- Reduce the average class size in primary schools
- Zero car traffic growth for London as a whole
- A 50 per cent increase in passengers and freight transported on the Blue Ribbon Network
- Maintain at least 50 per cent of B1 development in PTAL zones 5–6
- No net loss of designated Sites of Importance for Nature Conservation
- At least 45 per cent of waste recycled/composted by 2015 and zero percent of biodegradable or recyclable waste to landfill by 2026 *[what are the new targets in the 2021 London Plan?]*
- Annual average percentage carbon dioxide emissions savings for strategic developments proposals
- Progress towards zero carbon in residential development
- Production of 8550 GWh of energy from renewable sources by 2026
- Increase the total area of green roofs in the CAZ
- Restore rivers and streams

London Forum proposes that each of those 2016 KPIs should be monitored and reported upon in the AMR from 2023 unless covered by the twelve KPIs of the March 2021 London Plan.