

**NORTH LONDON WASTE AUTHORITY**

**REPORT TITLE:**  
**PLANNING FOR A BETTER LONDON  
CONSULTATION**

**REPORT OF:**  
**HEAD OF WASTE STRATEGY AND CONTRACTS**

<b>FOR SUBMISSION TO:</b> <b>AUTHORITY MEETING</b>	<b>DATE:</b> <b>26<sup>th</sup> September 2008</b>
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**SUMMARY OF REPORT:**

This report provides details of the Greater London Authority's recent publication entitled 'Planning for a Better London'. The publication sets out the general approach that the Mayor will take in carrying out his planning functions, provides details of the major planning challenges facing the capital, outlines the policies and initiatives that the Mayor intends to put in place to meet the challenges and explains the changes that will be made to the London Plan (the spatial strategy for the capital) and other policy guidance over the forthcoming months. The consultation document seeks responses to a number of questions by 10<sup>th</sup> November 2008.

A draft response is attached as an appendix to this report, for Member approval.

**RECOMMENDATION**

The Authority is recommended to approve the draft response to this consultation outlined in Appendix 1.

**Signed by Head of Waste Strategy  
and Contracts**

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**Date:** .....

## 1.0 BACKGROUND AND INTRODUCTION TO THE CONSULTATION

- 1.1 This section sets out the background and introduction to the “Planning for a better London” consultation. Sections 2-6 of the report summarise the positions of the new London Mayor. Section 7 sets out the main implications for the Authority, and Appendix 1 is the draft response.
- 1.2 This July 2008 consultation from the Greater London Authority (GLA) is about proposed changes to the current system of planning within London following the change in administration after the Mayoral elections in May. The publication consists of four chapters or sections, each dealing with a different aspect as follows:
1. **‘The Mayor’s approach’** – outlines the general approach the Mayor will take to planning for London, the GLA’s role, and how he will add value to the London planning system.
  2. **‘The Key Challenges’** – sets out some of the major challenges facing planning in London, and some of the ways the planning system can help address them.
  3. **‘Key Policy Responses’** – describes some of the detailed policies and initiatives that the Mayor will put in place to meet these challenges.
  4. **‘Making it happen’** – explains in more detail the changes that will be made to the London Plan and other policy guidance to put the policy approaches described in the previous sections into effect.
- 1.3 Consultation questions are posed for each of the first three sections of the document, but not the last.
- 1.4 A summary of the relevant changes proposed to the London Plan (as outlined in section four of the document) is included in this Authority report, for Members’ information, along with an outline of the implications for the Authority. However, the proposed changes are not commented upon in the draft Authority response because no specific questions are outlined in this section for respondents to respond to, and no comments are invited in this regard. The draft Authority response simply therefore urges that any plans to raise contributions from development towards the funding of Crossrail be outlined and consulted upon at the earliest opportunity.
- 1.5 The report which follows is organised and divided as per the above four sections of the consultation document and highlights the key aspects of each. Appendix 1 is a draft response to the consultation which the Authority is recommended to approve.
- 1.6 It is important to note that this consultation is not part of the statutory process for changing the London Plan. It is intended to give an idea of the issues that the Mayor and the GLA will be addressing and to encourage stakeholders to write in with their views and comments.

## **2.0 INTRODUCTION**

2.1 There are a number of key drivers behind this consultation and the proposed revisions to the London Plan and the various other related strategies and guidance for which the Mayor is responsible which are outlined in the consultation document as follows:

- London is growing at a rate not seen for many decades which in turn brings social, environmental and economic challenges.
- There is evidence of 'unacceptable and growing' disparities in wealth, health and quality of life.
- There are serious problems of poor air quality and noise pollution and a need to step up to the challenges of a changing climate.
- London must continue to remain internationally competitive to provide prosperity for all parts of the city and all Londoners.

2.2 In addition to the above drivers, the Panel that examined the last set of alterations to the London Plan recommended a complete review of the document. (Draft Further alterations to the London Plan, Examination in Public, 18 June – 10 July 2007, Panel Report, September 2007).

2.3 In the foreword to 'Planning for a better London' the Mayor draws on a number of key themes which form the basis for the proposals set out in the consultation document:

- All Londoners should have the homes, opportunities and services they need.
- London's businesses should have the opportunities they need to grow, to have access to markets and to attract the skilled workers they require.
- London's environment must improve and we must step up our efforts to tackle climate change.
- London's distinctive character, its diverse neighbourhoods and unique heritage must be cherished and protected.
- All Londoners should be able to share in their city's success, feel safe in their neighbourhoods, and enjoy an improving quality of life.

## **3.0 THE MAYOR'S APPROACH**

3.1 This section outlines the general approach that the Mayor of London will take to planning within the capital, the GLA's role and how he intends to add value to the London planning system.

3.2 The consultation document notes that the London Plan sets out clear policies, based upon sound evidence and a cogent analysis of the reasons for London's growth. The consultation document also acknowledges that processes have been put in place enabling strategic planning applications to be dealt with efficiently and effectively and that for the most part, effective relationships have been built with boroughs, the private sector and other stakeholders who have helped to deliver real benefits for London. However, there are a number of changes proposed as follows:

- 3.3 The consultation document proposes a new approach to decision making, with City Hall, with the support of the GLA Group of organisations (particularly the London Development Agency (LDA) and Transport for London (TfL)) working with boroughs and others from the public, private and voluntary sectors to help agree the objectives for planning in London and how they can best be delivered.
- 3.4 It is proposed that there will be less emphasis on targets, although there will be rigorous monitoring of policy implementation and 'assertive management of obstacles that put agreed planning objectives at risk'.
- 3.5 It is proposed that there will be more emphasis given to issues affecting outer London and whilst the sub-regional approach to translating strategic policies in the London Plan into more local action is acknowledged as being a convenient way of working it is intended that the current model of sub-regional working will be reviewed<sup>1</sup>. 'Planning for a better London' suggests that the current sub-regional arrangements are not the most appropriate, particularly with regard to East and Central London.
- 3.6 It is also proposed that the GLA will look at whether there are ways of promoting better joint arrangements between sub-regions in addressing issues of shared concern.
- 3.7 In view of this, the GLA intends to suspend further work on sub-regional implementation frameworks until the review of the current model of sub-regional working is completed.
- 3.8 In relation to the London Plan, the consultation document notes that 'the Mayor supports much of the underlying analysis and strategy that underlies the current London Plan.' The document emphasises the Mayor's commitment to supporting the protection of Green Belt, Metropolitan Open Land and London's green and open spaces. He will also promote best standards of energy efficiency, inclusive, accessible design, new inspiring architecture and high quality urban design. In relation to new developments, the consultation document notes that the Mayor will support investment in the existing fabric of the city, but will insist that:
- it is appropriate to its context
  - improves the quality of the environment
  - and enhances quality of life, both locally and in London more widely.

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<sup>1</sup> In the London Plan the 'Northern' planning sub-region includes all the NLWA boroughs excluding Waltham Forest but including the City of Westminster, for waste planning purposes the Northern sub-region matches the Authority region.

- 3.9 The consultation document notes that the GLA will look at the range of planning services that the GLA provides and whether there are areas where these can be developed or extended to help the planning system in London. As part of this the consultation document seeks views on whether it would be useful to organise an annual London Planning Convention to provide a forum for discussion of major issues facing those planning in the capital and a way of feeding back to the Mayor on his policies and activities.
- 3.10 Finally this section of the consultation document provides clarification of two particular aspects regarding planning in London:
- Firstly that whilst the GLA Act 2007 has given the Mayor powers in certain circumstances to take over planning applications that are of 'potential strategic importance' for his own decision, the document states that 'The Mayor intends to use his powers carefully and sparingly, only taking over those which do have genuinely strategic implications for the planning of London. It is likely, therefore, that he will use these powers only in the most exceptional circumstances.'
  - Secondly, clarification is provided regarding planning decisions that have already been made. The document notes that for the planning system to work effectively there needs to be some finality in the decision-making process and therefore it is not proposed to re-open planning decisions made by the previous Mayor.

## Questions

- 3.11 This section poses four questions for consultees:
- 1) Is the approach to planning set out in this chapter the right one?
  - 2) Does it strike the right balance between local and strategic issues?
  - 3) Are there things you think the Mayor and the GLA could do to improve planning in London which are not identified here?
  - 4) Do you support the idea of an annual London Planning Convention?  
Would you attend if it were to be organised?

## 4.0 THE KEY CHALLENGES

- 4.1 This section outlines some of the key challenges facing planning in London, and some of the ways the planning system can help address them. The key challenges are identified as follows:
- 4.2 *Continued population growth* – from an estimated base of 7.51 million Londoners in 2006, the most recent projections are for a population of between 7.96 and 8.14 million by 2016 and 8.27 million by 2026. The number of households is also anticipated to increase by possibly 700,000 by 2026, with 75% of these new households being one person households.

- 4.3 *London's changing economy* – is identified as the second key challenge, because as the economy in London grows, this will put pressure on the availability of workspace with an estimated need for up to 8.1 million square metres of additional office space possibly required by 2026 in addition to the associated premises required for growing sectors such as leisure, warehousing, transport and waste.
- 4.4 *Improving the environment and tackling climate change* – are identified as the third key challenge, incorporating both climate change adaptation strategies in addition to mitigation. The planning system is seen as a contributor to reducing the city's emissions of greenhouse gases, principally carbon dioxide, through measures such as using the planning system to work towards new developments being 'zero carbon', for example, promoting energy efficient design and construction, greater efficiency in the use of resources (such as use of combined heat and power and the use of heat networks), and the use of renewable energy sources. It is also identified as being able to help encourage decentralised energy systems, such as area-wide community heating networks.
- 4.5 *Providing the homes that Londoners need* – is identified as another key challenge, particularly in relation to affordability.
- 4.6 *Planning for all Londoners* – responding to the diversity of London's population is identified as an additional challenge.
- 4.7 *Planning for the whole of London* – is also seen as a challenge, particularly in terms of East London and the outer London boroughs.

### **Questions**

- 4.8 This section poses two questions:
- 1) Have we correctly identified the key challenges that planning in London has to address?
  - 2) Are there other challenges that need to be addressed?

## **5.0 KEY POLICY RESPONSES**

- 5.1 This section of the document describes some of the detailed policies and initiatives that the Mayor will put in place to meet the challenges outlined in the previous section. Outlined below are some of the relevant key policy responses to meeting the environmental challenge that are identified in the report and other relevant proposals identified as responses to some of the other challenges.
- 5.2 The Mayor will ensure that forthcoming supplementary planning guidance on renewable energy will also make clear the Mayor's strong support for micro-generation and on-site renewable energy, but without being overly prescriptive about the technologies to be used.

- 5.3 The Mayor will also use the planning system to 'improve the way London deals with waste, encouraging minimisation, recycling and more environmentally-friendly methods of disposal.'
- 5.4 In addition to the above, the Mayor will continue to promote the development of East London and the Thames Gateway as priority areas for development and regeneration. The Lee Valley, (Upper and Lower), Kings Cross and Cricklewood/Brent Cross are identified too as opportunity areas within the current London Plan and Haringey Heartlands/Wood Green is also identified as an area for intensification, however, the consultation document only singles out East London and the Thames Gateway as specific planning priorities for development and regeneration.
- 5.5 The Mayor will also establish an Outer London Commission to identify ways for ensuring the outer boroughs realise their full potential and to make recommendations to inform revision of the London Plan and the preparation of supplementary planning guidance. New centres of employment will be encouraged 'in parts of outer London, like Barnet or Croydon' which will also reduce the strain on the transport links in to central London.

### **Questions**

- 5.6 This section poses three questions:
- 1) Do the policy responses suggested here adequately address the challenges facing planning in London?
  - 2) Are there other responses that should be considered?
  - 3) How should we strike the balance between meeting the challenge of growth and improving quality of life?

## **6.0 MAKING IT HAPPEN**

- 6.1 The final section of the document explains in more detail the changes that will be made to the London Plan and other policy guidance to put the policy approaches described in previous sections into effect.
- 6.2 There are no questions for consultees included in the section, but the key proposals are summarised here for Members' information.
- 6.3 Firstly it is proposed to change the way that supplementary planning documents are drawn up, to bring interested parties into the process at an earlier stage. There are three types of supplementary document:
- supplementary planning guidance or SPG which give detailed guidance to supplement the policies contained within the London Plan;
  - best practice guidance or BPG which identify and describe best practice on issues covered by London Plan policy; and
  - Implementation Reports or IRs which give more detailed guidance on implementation of London Plan policies.

6.4 Secondly it is proposed to alter and revise the London Plan according to the timetable outlined below.

<b>Period from July 2008</b>	<b>Action</b>	<b>Comments/Notes</b>
Next 3 months (August – October 2008)	Give consideration to altering the London Plan to enable the use of the planning system in London to raise contributions from development towards the funding of Crossrail	
Next 8 months ‘or so’ (August 2008 – March 2009)	Start the process of altering the London Plan to deal with: a number of housing issues, design policy and any other changes required in policies on economic or environmental issues	It is likely these alterations will be in place for formal publication towards the end of 2010
Next 18 months ‘or so’ (August 2008 – January 2010)	Start work on a complete review of the London Plan	This will be a major undertaking and may not be completed until 2012

6.5 Relevant new SPG will be published as follows:

- Revised SPG on sustainable design and construction and renewable energy within the next 12 months.
- New SPG on Outer London, to take account of the recommendations of the commission that will be established to examine policies for Outer London, during 2010/11.

## **7.0 IMPLICATIONS FOR THE AUTHORITY**

7.1 The implications for the Authority of these proposed changes are as follows:

- Possible implications for the waste planning framework within which the Authority is working, if the sub-regional planning boundaries within the London Plan change, although this is not certain. The London Plan’s current policy direction is clear that it is up to boroughs to decide whether and how they want to work together on waste apportionment and whether and if they want to pool the ‘apportioned’ amount of waste that the London Plan identifies must be managed by each borough and produce a waste development plan document collectively with other boroughs (as is the case in North London). It is therefore entirely possible for a review or change to the *planning* sub-regions not to affect the *waste planning* sub-regions. However, if there are possible effects, it is unclear at this stage, what these changes might be.

- Possible new mechanisms to encourage greater joint working between planning sub-regions, although without knowing the detail of these proposals it is difficult to assess their likely effect on the Authority.
- Less likelihood of Authority proposals for new waste facilities being reviewed by the Mayor of London than previously, meaning that the planning decisions on new waste facilities are more likely to be left in the hands of the relevant borough council for each.
- New guidance and renewed commitment to renewable energy and possibly a less prescriptive approach to technology choice in relation to the same.
- Further guidance and direction on waste planning to encourage further movement 'up the waste hierarchy', i.e. away from landfill disposal.
- Regeneration and employment being key features of the planning framework, particularly in relation to East London and the outer London boroughs, so that the employment potential of new waste facilities will need to be further emphasised in any developments put forward by the Authority or its contractors.
- A revised framework for planning in the outer London boroughs, which could particularly affect proposals in Barnet, Enfield and Waltham Forest. However, as the detail of this framework is yet to be decided the implications of this change cannot be anticipated at present.
- A potential increase in the costs of new developments if a mechanism is introduced to raise funding for Crossrail from new developments, although until the detail of these proposals is known it is not possible to say whether this might raise development costs in locations unlikely to directly benefit from Crossrail or whether it would only raise costs in areas benefiting from the project.
- A revised London Plan by 2012, which might incorporate new policies of relevance to the Authority, but at this stage it is not possible to identify what these changes might be or to assess the possible implications for the Authority.

7.2 Any changes resulting from this consultation are unlikely to impact until financial year 2009/10 at the earliest, and be in the form of supplementary planning guidance. Although some of the proposals may have financial implications for the Authority during that year, at this stage of early consultation, it is not possible to provide an estimate of their potential impact. The Authority's draft response urges early notification of any potential changes which are likely to have financial implications.

## **8.0 RECOMMENDATION**

8.1 The Authority is recommended to approve the draft response to this consultation outlined in Appendix 1.

## **9.0 COMMENTS OF THE FINANCIAL ADVISER**

9.1 The Financial Adviser has been consulted in the preparation of this report and has no comments to add.

## **10.0 COMMENTS OF THE LEGAL ADVISER**

10.1 The Legal Adviser has been consulted in the preparation of this report and has no further comments to add.

### **Local Government Act 1972 – Access to information**

**Documents used:** Planning for a better London, Greater London Authority, July 2008

The London Plan, Spatial Development Strategy for Greater London, Consolidated with Alterations since 2004, Greater London Authority, February 2008

Draft Further Alterations to the London Plan (Spatial Development Strategy for Greater London), Greater London Authority, May 2006

Draft Further Alterations to the London Plan, Examination in Public, 18 June – 10 July 2007, Panel Report, September 2007

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**Appendix 1.**  
**Draft letter of response to 'Planning for a better London'**

Andrew Barry-Pursell  
Head of London Plan  
Greater London Authority  
City Hall  
The Queen's Walk  
London  
SE1 2AA

26<sup>th</sup> September 2008

Dear Sir,

**Planning for a better London**

Thank you for providing us with the opportunity to respond to the consultation on the above. NLWA is one of the four joint waste disposal authorities in London, with nearly 1m tonnes of municipal solid waste arising in its area each year.

In our response which is attached we have focused upon aspects which have particular relevance to the Authority, of which the two most important concerns for us would be:

- That any review of the planning sub-regions could have possible implications for waste planning and/or the waste planning sub-regions, which could affect planning strategy and associated decisions for applications. We recognise that it is for boroughs to decide whether they wish to work together on waste planning and in particular to pool the waste apportionment targets currently included within the London Plan, but we would be concerned that any wider review of planning regions in London could potentially have a knock-on effect for the Waste Authority and potential financial implications in terms of delays to the development of new facilities to meet national, regional and local landfill diversion targets; it might also hinder the seven boroughs' planning goals for local land-use in relation to waste.
- Proposals to alter the London Plan to enable the use of the planning system in London to raise contributions from development towards the funding of Crossrail, as again this could have financial implications for the Authority and/or its future contractors.

The Authority supports the review of the London Plan and welcomes the development and publication of further planning guidance. We will be keen to be involved in future consultation on the London Plan and look forward to further information being made available in due course.

Thank you once again for the opportunity to respond to this consultation and if you require clarification on any of the points raised, please do not hesitate to contact me.

Yours faithfully

**Cllr Clyde Loakes**  
**Chair, North London Waste Authority**

# **THE NORTH LONDON WASTE DISPOSAL AUTHORITY RESPONSE TO PLANNING FOR A BETTER LONDON**

## **1.0 GENERAL COMMENTS**

- 1.1 The Authority is broadly supportive of the approach outlined in the consultation, to update the London Plan and to plan for a better London on the basis of the themes identified in the foreword to the consultation document.
- 1.2 The Authority has fully engaged in all previous reviews of the London Plan, including the two most recent Examinations in Public and also in the consultation process associated with the more recent waste apportionment modelling incorporated into the Plan.

### **Planning sub-regions**

- 1.3 Our key concern at this stage from a general perspective is that there would be uncertainty for the Authority if the planning sub-regions were to change. Whilst the Authority recognises that it is for boroughs to decide how they should best meet the waste apportionment targets currently included within the London Plan, and accordingly whether to pool the targets, as in the case of North London, we are unsure from the consultation document whether any wider proposals to review and possibly alter the wider planning sub-regions in London would have any further implications for waste planning. We would be concerned that any wider review of planning regions in London could potentially have a knock-on effect for the Waste Authority and potential financial implications in terms of delays to the development of new facilities to meet national and local landfill diversion targets; it might also hinder the seven boroughs' planning goals for local land-use in relation to waste.
- 1.4 We would therefore urge that there should be no change to the North London planning sub-region in order not to delay processes of waste planning and infrastructure development that are already well advanced.

## **2.0 SECTION 1 – THE MAYOR'S APPROACH**

- 2.1 The Authority's response to the consultation document on proposed changes concentrates upon aspects of the questions which have most relevance to us as a Waste Disposal Authority:

**1. Is the approach to planning set out in this chapter the right one?**

The Authority understands the rationale for reviewing the current model of sub-regional working, but as outlined above, is concerned about the potential implications for North London in particular and potential resultant impact on the delivery of other objectives contained within the London Plan.

We welcome the proposal of possible new mechanisms to encourage greater joint working between planning sub-regions although we cannot comment on this any further at this stage, without knowing the detail of the proposals.

In relation to the Mayor's powers in certain circumstances to take over planning applications that are of 'potential strategic importance' we would welcome some further clarity on this issue at the earliest opportunity. We note that the Mayor intends to use these powers only in the most exceptional circumstances, so would welcome some clarification regarding the possible nature of those 'exceptional circumstances' so that we might understand better the likely decision-making body for planning applications for waste facilities in particular going forward.

In general terms we favour an approach which sees intervention of the Mayor in local planning decisions only when necessary because of a project's potential strategic importance. However, our key concern is that there is clarity about the circumstances in which projects will be called in for decision by the Mayor .

**2. Does it strike the right balance between local and strategic issues?**

The proposals contained in the consultation document for a revised planning framework for planning in outer London are noted, but we cannot comment further on these without additional detail.

**3. Are there things you think the Mayor and the GLA could do to improve planning in London which are not identified here?**

One aspect which the Mayor and the GLA could usefully clarify in terms of waste planning in particular, would be whether the priority for the capital is likely to be self-sufficiency or whether it is likely to be carbon dioxide reduction and climate change mitigation. On a practical level this is important because, for example, if waste is made into a solid recovered fuel and then sent elsewhere to be burnt to produce electricity and heat, this might have a better profile from a carbon dioxide emissions perspective than say incineration producing only electricity sited within the capital, but the former would not score so well in self-sufficiency terms. We appreciate that there will need to be a balance between differing priorities in the plan, but the particular interplay between self-sufficiency and carbon dioxide is particularly important and relevant for us.

The Authority believes the Government was correct in removing regional self-sufficiency from the national waste strategy last year, and believes the London Mayor should now follow suit at the same time as lobbying the Government to require other regions to do the same. It is the Authority's view that regional self-sufficiency should always be a secondary issue relative to carbon, energy and other environmental impacts.

The Authority believes too that the London Plan is overly prescriptive in relation to waste treatment technologies, and that these issues of carbon, energy and other environmental impacts, along with costs of course, are the issues that should be paramount.

**4. Do you support the idea of an annual London Planning Convention? Would you attend if it were to be organised?**

The idea of an annual London Planning Convention is supported by the Authority and we would send a representative should one be organised. We would be keen however for such a convention to include 'break out' sessions on particular issues such as housing, transport and waste for example, so that the whole event was sufficiently relevant and focussed and useful for both all attendees and the GLA.

### **3.0 SECTION 2 – THE KEY CHALLENGES**

**1. Have we correctly identified the key challenges that planning in London has to address?**

The Authority agrees with the key challenges that planning in London has to address and specifically welcomes the recognition that improving the environment and tackling climate change are key challenges for the capital.

**2. Are there other challenges that need to be addressed?**

We would suggest that the challenge of transport is given more emphasis and singled out specifically. There is a part of section 3 of the consultation document regarding policy responses, entitled 'Keeping London Moving' which is welcomed, but it would be useful if this was mirrored in the 'challenges' section as a change to which the new London Plan will need to respond. The transport system will be increasingly stretched as London's population and economy grows and the by-products of such growth, such as increased amounts of waste that must be handled, transported and treated will add to this pressure

## **4.0 SECTION 3 – POLICY RESPONSES**

### **1. Do the policy responses suggested here adequately address the challenges facing planning in London?**

The Authority welcomes the possibility of new guidance and renewed commitment to renewable energy and the Mayor's strong support for micro-generation and a less prescriptive approach to technology choice in relation to this.

We similarly welcome the commitment to using the planning system to improve the way in which London deals with waste, encouraging minimisation, recycling and more environmentally-friendly methods of disposal.

In addition to the above, the Authority supports the continued promotion of the development of East London and the Thames Gateway as priority areas for development and regeneration, but would urge that the Lee Valley, (Upper and Lower), Kings Cross and Cricklewood/Brent Cross are identified too as they are also opportunity areas with regeneration potential identified within the current London Plan. Haringey Heartlands/Wood Green is also identified as an area for intensification within the plan and should not be overlooked.

### **2. Are there other responses that should be considered?**

Please refer to our comments at Section 1 above, particularly question 1.

## **5.0 SECTION 4 – MAKING IT HAPPEN**

- 5.1 Finally, whilst comments on the final section of the consultation document have not been invited we would urge any proposals regarding the use of the planning system in London to raise contributions from development towards the funding of Crossrail to be outlined and consulted upon at the earliest opportunity. Without further detail we cannot comment at this stage, but as there may be adverse financial implications for the Authority and/or its contractors we would welcome involvement in any such consultation as soon as possible.

## **6.0 CONCLUSIONS**

- 6.1 In conclusion, the Authority supports the review of the London Plan and welcomes the development and publication of further planning guidance. We will be keen to be involved in future consultation on the London Plan and look forward to further information being made available in due course.

**Report Ends**