

## **BLOG: FIRST MORNING**

### **Housing and Urban Form: Tensions in the London Plan Examination in Public**

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#### **What We Learned from the First Morning of the EiP**

Thirty-two months into Sadiq Khan's mayoralty, and a year after the draft of his flagship [New London Plan](#) (the city's spatial strategy), went out for consultation, its formal [Examination in Public](#) (EiP) started last Tuesday.

As ever, the agenda for the first week's session looked remarkably dull, covering legal/procedural matters, format/scope/content plus the broad 'good growth policies' - hardly an amuse-bouche!

But discussion of these formalistic issues - about the soundness and legality of plan-making procedures - started to signal some key lines of enquiry from the Panel which are likely to run through the EiP, as well as the tone of the Panel's handling of debates.

The first morning (in which we participated) started with a presentation by Jules Pipe, the Deputy Mayor for Planning, which emphasised both the Plan's central concern with getting housing built and a radical shift in direction. A keynote language of 'good growth' itself implies little new (unless it were to mean less concern with overall growth than is apparent). The main new ingredient lies in a small sites policy for housing development, intended to get round the slow delivery so far experienced from a pipeline skewed toward very large sites.

The focus of discussion then was not the Plan document itself but a comparably bulky but much less digestible, set of '[impact assessments](#)', known familiarly as the IIA (though the first initial stands not for 'independent', as I keep supposing, but rather 'integrated', in the sense of encyclopaedic). The interest in this (that I'd rather taken to be just for anoraks) is that it addresses questions of choice, alternatives and criteria that are all but totally obscured in the Plan document itself (and, less excusably) in the initial [City for All Londoners](#) prospectus put out for public consultation.

This generated a lot of sharp cross-questioning from the Panel-lead for this session (David Smith) and other participants, which was allowed to flow freely and productively. Most of this focused on just a couple of dimensions of the IIA (about spatial alternatives and the treatment of equalities issues). But it also gave a clearer insight into the relation between IIA and Plan - including that my naïve expectation that the IIA would be fulfilling an independent, critical or corrective role was not true.

Most importantly, the regular references throughout the IIA report to 'the preferred option' signified what the GLA preferred, rather than the independent consultant's judgement. That's useful as evidence of the GLA's logic - but leaves unclear where that might have been challenged during the 'assessment' process.

The other was an equally clear statement that the IIA and Plan reports were closely related processes that had been finalised at the same time. Coupled with the previous point, this makes it very hard for outsiders (including the Panel) to make confident judgements about either the IIA's evaluation of the published Plan draft or about how well the Plan incorporated lessons from the IIA. Both aspects seem to compromise any use of IIA material as evidence in later sessions – except in attempts to infer what logic and choices might have underpinned specific Policies.

On one such Policy, involving the 'reasonableness' of the set of spatial alternatives considered by the Mayor and the adequacy of that consideration (on which LSE London's submission judged the IIA to be unfit for purpose), several participants expressed dissatisfaction with the treatment of alternatives to the slightly souped-up version of the old compact city model – particularly in relation to Green Belt. The policy itself will be discussed in depth next week, but in relation to how the IIA worked, three significant points were established:

- the whole process was biased, by a prior political commitment to leave Green Belt untouched, so alternatives to 'sustainable intensification' were never worked up sufficiently to allowed objective comparison. [Just Space](#) argued that this was against international norms for the conduct of Impact Assessments;
- during the IIA process options were split up to allow effects of specific elements to be identified (at least in principle), but were never recombined as would be necessary if it appeared more than one would be required to meet development requirements (e.g. intensification plus Green Belt release, plus city-region collaboration);
- the original IIA assessment of limited Green Belt release as having negative environmental consequences had been modified [in the 'addendum' document] to an admission that it was 'inconclusive' – although this hadn't affected the GLA's preference not to consider it.

More on this next week, when a wider set of participants join in!

The other theme which seem likely to have 'legs' during the EiP is that of equalities. A very powerful, well-argued case was made that the IIA as a whole had dealt with inequalities issues in an extremely limited and superficial way. In particular evaluations of a wide range of policy options had not taken account of the likelihood of very different impacts on different population groups within London, either in terms of those with a protected position under discrimination legislation or more broadly in relation to people with less social and economic power. The Mayoral team stated that detailed assessments had been carried out in many cases. They indicated that these could be made available – but the critics wanted the Panel to request that this material to be made available, within a few days [As they did, yielding material now posted in the [EiP's online library](#)].

All in all, I thought this was a surprisingly interesting first morning and encouraging in terms of the Panel's willingness to have key aspects of the Plan opened up for real discussion.