

Written Submission from LSE London (London School of Economics, ID 845) on Matter M16 for consideration in the Examination in Public of the New London Plan, 2019

1. Introduction

Our submission on this Matter follows on logically from those on:

M1, which (severely) criticised the IIA assessment of alternative spatial strategies, both for failing to recognise the inadequacy of its/GLA's preferred internal 'intensification' option in meeting basic needs for the delivery of residential development, and for the extreme superficiality of its assessment of the potential contribution of development elsewhere in the Wider South East, treated purely as an alternative (rather than complement) to internal intensification); and on

M10, arguing for the need to pursue such external options seriously.

In this submission, rather than repeat these arguments as to need for the Plan to address 'the matter of development and growth in the wider South East', we focus on the Panel's question about 'how' this should have been done, and about the *need/adequacy of policies SD2 and SD3*, in relation to Plan implementation and/or informing a future review of the Plan?

We start by recognising the symbolic significance of the NLP's statement (para 2.2.1) that 'London is not an island' – contrasting with the (reverse) impression conveyed by all its predecessors - and with the space accorded to WSE and collaboration issues, including the two policies referred to. This does reflect a significantly increased level of engagement since the FALP between the GLA and authorities elsewhere in (what is now identified as) the Wider South East, and indeed between those authorities themselves (and the Eastern/South Eastern associations of them), expressed not only in regular meetings but collaborative action directed at central government, in respect of both housing policy and infrastructure investment priorities.

But almost all of the Plan does actually still implicitly treat London as an island, with scarcely any attention to the ways in which overlapping housing and labour markets (in particular) affect responses both to exogenous shocks and to planning policies. And the seriousness of engagement in relation to planning/development activities in no way measures up to the FALP Inspector's suggestion that a review of the London Plan include: *'engaging local planning authorities beyond the GLA's boundaries in discussions regarding the evolution of our capital city'*.

2. Policy SD2: Collaboration in the Wider South East

For the most part - at least the first three of its five sub-elements - this policy statement is quite anodyne, expressing a willingness to work together, exchange views, promote a consistent information base – and consider collaboration 'where mutual benefits can be achieved'.

There is one less transparent sub-element, involving the Mayor's support for 'recognition of long-term trends in migration in the development of local Plans outside London'. The significance of this is not elaborated on in the text, but seems to represent a reminder that – despite ideas about London accommodating all of its growth within its boundaries (2.3.1) – the long-term norm, involving a substantial net outflow of residents from London to other parts of the WSE, is not

actually expected to change during this in the Plan period. (This is slightly undercut later by the acknowledgement that (just) ‘some migration will continue’ (2.3.4). A pertinent question, with no suggested answer in the Plan, is whether, if London started to hit its new housing delivery targets these flows might be expected to diminish significantly.

The final sub-element is denser but also pretty opaque. It commits the Mayor to working with WSE partners to find solutions to a very wide range of potential strategic concerns. The only specific steer in relation to these, perhaps oddly, involves work on finding smart digital solutions to environmental issues. A linkage with addressing barriers to housing delivery is also implied, but this seems only to involve the possibility of monitoring impact/planning agreements, ‘for example related to urban design’.

3. Policy SD3: Growth Locations in the Wider South East

This policy statement is also more opaquely worded than those on issues within London. Part A suggests a willingness to work with WSE partners (and others) to ‘realise the potential of the wider city region’, though (perhaps diplomatically) this is related here only to investment in strategic infrastructure (to support housing/business development in growth locations, to secure mutual benefits, as well as meet needs). Part B also rather vaguely refers to the Mayor ‘supporting recognition of’ (the same phrase as for migration trends) ‘with links to London in local Plans’.

Much more substance is given to these unclear indications of willingness in the accompanying text, which reports Mayoral interest in:

- ‘working with willing partners beyond London to explore if there is potential to accommodate more growth in sustainable locations outside the capital, including possible new settlements in areas with good (rail) links to London 2.3.4 and 2.3.5;
- helping investigate and secure mutually beneficial infrastructure funding to unlock these opportunities - and (a bit more specifically) a statement that the Mayor *will* work with key willing partners (including the NIC) to explore strategic growth opportunities where strategic infrastructure can unlock development to support the wider city region (2.3.7); and
- supporting formal partnership agreements between authorities (including with some authorities/groups outside London where work is already being pursued), particularly to ensure a balance between public transport capacity and planned growth – which could conceivably include selectively supporting enhancements to capacity in growth areas.

These are all to be welcomed, and include appropriate signs of Mayoral willingness to take a lead – as the single agent in the WSE most able to commit resources/effort in ways that could make a difference – while not overstepping his role as just one of the potential WSE partners. It does, however, seem very odd that in this particular case (unlike others in the Plan) the apparent ‘meat’ to the policy proposal is entirely excluded from its formal statement of SD3 – and that there is nothing here which could be formally monitored, or the Mayor held accountable for.

The problem is that these positive statements about interest in (what amounts) city-regional strategic planning are at odds with the rejection (explicit in the IIA) of such an approach as an important part of planning for accommodation of the population growth projected for London. Within this section of the Plan there are repeated references to the Plan’s aim to accommodate all of London’s population growth within its boundaries (2.3.1) or the vast majority of it (2.3.4) and to London having the capacity and targets for additional homes to virtually match assessed need.

At this point, though, there is reference to barriers to housing delivery needing to be overcome (in London as in the WSE as a whole) and it being ‘prudent to plan for longer term contingencies’ – which is the context for Mayoral interest in working with partners on the lines referred to.

The trouble is that these are not ‘longer term contingencies’ at all – except in the sense that all planning is geared to expectations that will turn out to be somewhat inaccurate in one way or another. To repeat what we are having to say in a series of submissions under different Matters (in most detail when we come directly to the matter of the SHLAA’s relation to housing delivery, in M19) on the available evidence the baseline assumption has to be that new/additional housing delivery in London will fall below estimated housing need growth, and targets, by a considerable margin, over (and through) the Plan period.

The Plan is in denial about this, but the pursuit of additional development possibilities elsewhere in the WSE, along lines discussed here (and previously at some length in the Outer London Commission report on Accommodating Growth¹) is not a matter of contingency planning, to be more urgently pursued if and when housing delivery in London remains at a disappointingly below-target level. It is the missing key element in the NLP – along with the more positive attitude to London Green Belt review that would signal London’s *willingness* to partners elsewhere in the WSE.

4. Conclusion

The fundamental flaw in the NLP as a strategic document is its failure to recognise the inadequacy of sustainable intensification within London as the meeting residential development requirements, and to seriously investigate spatial options including *planned* growth areas outside London. The lines of intended Mayoral action set out in relation to SD3 in particular are welcome, positive and helpful but:

- too late, vague and contingent in how they are framed; and
- needing to be incorporated explicitly in the formal statements of policy, which appear deliberately opaque in their current form.

¹ Outer London Commission 7th report: *Accommodating London Growth*. March 2016 (London: GLA),