

COMMON FUTURES NETWORK

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M16. THE WIDER SOUTH EAST AND BEYOND

(a) How, if at all, should the Plan address the matter of development and growth in the wider South East?

The answer to question is an unqualified yes. Our view is that the future of London needs to be considered within the context of the wider London metropolitan region. The report of the Panel on the last London Plan Examination in Public that the Mayor needed to establish an effective method of engaging in discussions on the planning of the metropolitan region with the planning authorities within the travel to work area centred on London – the Functional Urban Region, now termed the Wider South East. While we recognise that policies SD2 and SD3 represent a set towards improved collaborative planning, we remain concerned that the Mayor’s compact city approach – that London’s needs can continue to be met within the Greater London administrative boundary is deficient. We recognise that the Mayor’s strategic planning powers only operate within specific territorial limits, but in our view the London Plan should have a more explicit recognition of the inter-relationship between London and the Outer Metropolitan Area, the Wider South East and more broadly to the rest of the United Kingdom. While it is understandable that the Plan focuses on the potential for London’s economic growth, it should also acknowledge the importance of the objectives of successive national governments reduce inequities between London and the rest of the UK. This is the focus of the UK2070 commission established by CFN under the chairmanship of Lord Kerslake.

Suggested approach to identifying and assessing options

The starting point for the required approach to strategic planning should be a city region-wide evidence basis encompassing an assessment of the requirements for development for each key land use across the region, possibly including alternative growth scenarios; and an assessment of development capacity, on a consistent basis to ensure that development capacity is most effectively used. The evidence base should include an assessment of whether recent development activity, has been appropriate in both quantitative and qualitative terms.

The identification of potential locations for residential and employment growth must include an assessment of both an overall spatial framework and of individual locations against a full range of economic, environmental and social sustainability criteria. This balanced approach is critical as justification for specific policy positions is often from a single perspective – for example the justification for Green Belt protection relies on giving preference to an environmentalist perspective, whereas the justification for concentrating new development in central London rather than adopting a more polycentric approach is often based premised on an economic perspective.

There is no single solution to responding to the challenges of London's growth and that a balanced approach will involve components of different options and not overdependence on a single option. The Mayor's proposed strategy relies on the continuation of hyper-dense development in central London and Opportunity areas which are primarily on the fringe of the Central Activities Zone, densification of town centres, residential densification of existing council estates, and suburban residential intensification. The strategy does not consider the potential for urban extensions to London, intensification of/, urban extensions to home counties towns, urban extensions to home counties towns, major new settlements within the Green Belt, major new settlements beyond the Green Belt, expansion of towns at the edge of the metropolitan region, residential dispersal to other parts of the UK, with or without employment capacity. In our view, all of these options may make a contribution to both the quantitative and qualitative shortage of housing and employment related development output, but given the numerical and qualitative deficits, the selection of only a limited number of these approaches is insufficient in quantitative terms, but more significantly does not necessarily produce the range of housing outputs which are necessary.

The first stage needs to be testing the viability of each option against different scenarios in terms of economic, political and governance contexts. There then needs to be an assessment of the impact of each option. For a spatial strategy to be sustainable, transport connectivity of new settlements and of intensified existing settlements is critical. Assessment of transport connectivity is not just about time and level of service but is also about affordability. The potential for intensification of lower density residential suburbs where there is good transport connectivity and social infrastructure or the potential to improve existing services on a cost-effective basis, should be considered. Similarly the potential for urban extensions to London along transport corridors should be subject to further detailed study. Reports by Transport for London, London First, AECOM, the Outer London Commission and QUOD with SHELTER have already identified significant potential for residential growth arising from new

stations to be provided under Crossrail 1 and Crossrail 2 programmes.

Mobilising resources

Decisions in relation to transport and other infrastructure investment must be related to a coherent spatial plan for the location of new and expanded residential settlements. Orbital light rail and enhancement of commuter networks could also make a significant contribution. While the Common Futures Network is not advocating specific development options, a number of sub-regional studies including sectors of London and the wider growth corridors are necessary. This approach was advocated in the 2000 LPAC strategic frameworks and the 2003 Sustainable Communities Plan, as well as in the earlier work of Sir Peter Hall and focuses on the green fingers/ green wedges approach to the urban/rural boundary rather than the concept of a rigid Green Belt.

We recognise that spatial planning is only one component of the development of a sustainable response to the challenges faced by London's growth and that issues of public and private sources of funding, land assembly, land value capture and governance are critical. Regulatory and taxation measures also have a role in ensuring the optimal use of both investment and development output, whether it be residential, commercial or transport and utility services or social infrastructure. We continue to see the social sustainability of planning decisions and development outputs as critical and this is central to any consideration of development options in a globalised city where we need to ensure that development activity benefits all of the population of the metropolitan region and reduces both social and spatial polarisation rather than increasing it.

We also need to recognise that the current governance structures for the planning of the metropolitan region are inadequate. London cannot be planned independently of the rest of the metropolitan region. The previous Mayor had begun to initiate discussions at both a political and professional level with the other planning authorities within the metropolitan region. These discussions need be put on a more formal basis and need to move beyond information sharing to a process which enables joint planning. There needs to be a consideration of a range of collaboration and governance options. This discussion was initiated by the fifth report of the Outer London Commission and taken forward in the joint report by the Centre for London and the Southern Policy Centre, as well as in a series of articles in the August 2016 and October 2018 issues of *Town and Country Planning*. London is not an island, nor is it a city state detached from the rest of the metropolitan region, the UK and Europe.

(b) Are policies SD2 and SD3 necessary, and would they be effective in assisting in implementation of the Plan and/or informing a future review of the Plan?

The Plan as drafted at para 2.23 refers to the fact that given the SHMA identifies a requirement for 66,000 homes a year within London while the SHLAA assesses a capacity of 65,000 a year, identifying a deficit of only 1,000 homes a year to be met elsewhere. We are however concerned that the requirements may be underestimated while the capacity may not be deliverable, partly because it assumes a much higher density of residential development which may not be appropriate to the range of identified housing needs, but also because it assumes a significantly higher rate of new housing development within London than has been achieved in recent years. We are therefore concerned that the contribution of areas in the wider south east to the housing and related development requirements of the London city region may need to be significantly greater than assumed in the Plan. Moreover, in our view, while we welcome the progress made to agree strategic infrastructure priorities across the Wider South East, to achieve more effective spatial planning across the city region, there needs to be a more collaborative approach across the city region to ensure a more consistent approach to the assessment of development requirements, not limited solely to housing requirements though this is a critical component, and a greater consistency in the assessment of development potential in terms of agreed criteria for the identification of appropriate sites for development and for the density of new residential development, with respect to access to public transport, social infrastructure and neighbourhood character. This initiative would require the active support of MHCLG. Discussions on an improved city region wide evidence base which involve representatives of the Mayor, East of England LGA and South East Councils have been initiated by the CFN in conjunction with the London and Wider South East Strategic Planning Network.

We would therefore propose two additional policies SD3C and SD3D as follows:

SD3C The Mayor should work with planning authorities in the Wider South East and with MCLG and other relevant Government departments to agree the collection of a common evidence base to inform strategic planning across London and the Wider South East.

SD3D The Mayor should work with planning authorities in the Wider South East and with MCLG and other relevant Government departments to agree criteria for the identification of appropriate sites for development and for the density of new residential development, with respect to access to public

transport, social infrastructure and neighbourhood character

References

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- QUOD and SHELTER (2016) When Brownfield isn't Enough
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<http://www.quod.com/brownfield-not-enough/>
- UK2070 Commission: <http://uk2070.org.uk/about/>