

OBJECTION

1 CONTEXT of ECONOMIC CHANGES

1A - *scale of change and factors*

- 1A.1 We agree that 'London is not an Island' and we note the 'extensive and complex network of centres.....as a whole....comprise the most productive region in the UK accounting for nearly half its output and making by far the biggest net contribution to the national exchequer .' (2.2.1)
- 1A.2 We consider that over the Plan period of 2017 to 2041 economic changes will transpire which will change the planning requirement across the UK equivalent to the changes that took place during the Victorian era.
- 1A.3 Identifying factors which influence economic prosperity and demographic projections is essential but interpretation in a number of (potentially conflicting) ways by different analyses needs to be avoided. Using community and social justice methodology would be essential to achieving a pan-UK balance.

1B - *political and trade realignments?* (Europe, Asia, America, etc.)

- 1B.1 Brexit will affect financial services and manufacturing sectors in ways which at the time of consultation are unknown. By building from local communities, these uncertainties can be better managed.

1C - *community values and social justice*

- 1C.1 Community values and social justice should be key reference points for all economic factors and change

1D - *future of work with Artificial Intelligence*

- 1D.1 We are mindful that the developments in Artificial Intelligence will most likely result in loss of employment in the Regions but an increase in employment in the South-East. This needs to be pro-actively addressed.

2 PAN UK DUTY TO COOPERATE

2A - *mutually beneficial to London and UK regions, especially the North of England*

- 2A.1 Clearly London must continue to flourish but not at the expense of the regions with which we consider London has a duty to cooperate.

2B - *rebalancing of economic growth and centres with emphasis on relationship with North*

- 2B.1 Perpetuating and exacerbating the north south divide is detrimental to growth for all.
- 2B.2 A pan UK strategy is in London's best interest and is a mutually desirable/beneficial strategy Both SD2 & SD3 are London-centric in their approach and wording, with the intention of delivering even greater benefits to London than it has at present compared with the rest of the UK.
- 2B.3 The Strategy should aim to encourage exchange of ideas, knowledge and skills with North at local levels.
- 2B.4 The Strategy should aim to relieve over crowding and environmental pressures in London.

3 APPROACH TO COMMUNITIES

3A - *infrastructure, services, jobs to be in place before transfer of people to new housing*

- 3A.1 There is a need to develop a set of criteria that satisfies community values and social justice and which is measurable.

3B - *keeping communities intact with regeneration*

- 3B.1 Rather than dispersing them, there should be a presumption in favour of keeping communities intact.

3C - *major new housing developments to be truly sustainable and genuinely affordable*

- 3C.1 In the Glossary the term 'affordable' covers social rent, affordable rent and intermediate housing. Each housing type should have separate entries in the Glossary. Within Policies and supporting text the three types of housing should each be mentioned, with reference to the Mayor's Viability SPG where appropriate.

3D - *revolution in public transport*

- 3D.1 The anticipated levels of development requires a revolution in public transport, in particular much expanded local and express bus network need to be implemented with incentives to use them. Rail transport networks, particularly in the North, need to be prioritised.
- 3D.2 The draft appears to suggest that the National Infrastructure Commission should favour London over the regions, a view with which we cannot agree.

4 CO PRODUCTION OF PLANS

4A - *avoid top down*

- 4A.1 Co - production with communities on plan delivery is essential, not just "consultation" in keeping with a localism first approach.

5 SUSTAINABILITY

5A - *reclaim and uphold genuine meaning with criteria based on community strengths and cohesion*

- 5A.1 London is a magnet for talent from across the UK, depriving the regions of essential skills to rebalance our economy and life chances. We therefore cannot overstate that the impact of the planning policies in the new London Plan must oblige London to consider and truly benefit the whole of the UK.

- 5A.2 It is very difficult to be accurate about demographic projections and need to consider there may be slower organic development in London but more in other areas of the UK.

- 5A.3 We are concerned about density intensification and creating not only a London megalopolis but a conurbation without sufficient green spaces and lungs.

- 5A.4 Added protections are needed for the environment in the face of such enormous pressures to expand.

5B - *minimise community fracturing and breakdown with growth and change*

- 5B.1 Top down generation of economic "opportunities" often overlooks and displaces local communities. This needs to be reversed.

- 5B.2 Industrial and employment strategies as well as infrastructure must precede transfer of populations/communities.

6 COST BENEFIT ANALYSIS

6A - *fairness and balance*

- 6A.1 We would like to see a Cost Benefit Analysis which takes the whole of the UK into account in the interests of fairness and balance and is reoriented towards community values and social justice.

6B - *promote community inclusiveness and values*

- 6B.1 The Plan must reflect the needs of the whole of the UK to go hand-in-hand with the transformation needed to ensure confidence in the planning system, meet the aspirations of citizens, provide a future based on community values and social justice.

7 CONCLUSION

- 7A - *duty to cooperate on both pan UK basis and with local communities, and with North in particular***

- 7A.1 We consider that the draft New London Plan requires a pan-UK duty to co-operate to ensure a fair rebalancing of opportunity for our citizens. The Duty to Cooperate needs to be based on localism first and foremost.
- 7A.2 We urge these two policies are re-thought.