



Examination in Public of the draft London Plan: Written submission by CPRE London (1142) to the EIP Panel, December 2018

SPATIAL DEVELOPMENT STRATEGY - OVERALL SPATIAL DEVELOPMENT STRATEGY

Matter 10: Should the vast majority of London's development needs be met within London? a) Is the approach of seeking to accommodate the vast majority of identified development requirements between 2019 and 2041 within London justified and would so doing contribute to the objective of achieving sustainable development? b) Alternatively, would accommodating more of London's development needs in the wider South East and beyond better contribute to the objective of achieving sustainable development? c) If so, is there a realistic prospect that such an approach in London and the wider South East could be delivered in the context of national policy and legislation??

1. CPRE considers that the proposed approach of accommodating the vast majority of identified development requirements to 2041 within Greater London is justified. London is, by world standards, a relatively low density capital city. Plenty of previously developed (brownfield) land remains available for development and there are at least 200,000 houses consented through the planning system but not yet built out. We thus believe that the identified development requirements will prove to be unrealistically high. It would therefore be unjustified and ineffective to plan for accommodating London's identified 'development needs' in areas where developers would cherry pick Green Belt sites rather than be required to regenerate brownfield land within Greater London.

2. At current rates of build-out, actual completions are likely to take far longer than envisaged in the draft Plan. Sir Oliver Letwin's 2018 *Review of Build Out* has found that the average of build-out rate on sites of between 500 and 1,000 dwellings is 5.4% per annum; on sites above 1,000 dwellings, only 3.2% [1]. In addition, build-out rates are also likely to be slowed if levels of infrastructure funding do not match the aspirations of the Plan, a scenario that is very likely given increased pressure for greater infrastructure spending on parts of England outside the wider South East (see our submission on Matter 16). Again, evidence of this came to light in the *Review of Build Out*, where Barking Riverside was stalled due to delays providing a rail link.

3. We believe there is considerable capacity to accommodate London's development needs within the existing built up area. For example, we have recently completed a detailed survey of opportunity to make better use of previously developed land in the London Borough of Enfield, ranging from the very small (which could accommodate up to 10 units) to very large (which could

accommodate several hundred units), which demonstrates that previously developed sites in Enfield could accommodate around 60,000 residential units enough to meet 20 years of housing requirements based on the latest Objectively Assessed Needs figures [a detailed analysis available on request.]

4. In addition, there is evidence showing that plenty of brownfield land is available for development in the Thames Estuary to the east of London, although some of will be outside Greater London. We believe that there is scope to sustainably regenerate this area as well provided that investment in improved rail links is prioritised, in particular the extension of Crossrail to Ebbsfleet.

5. We do not believe that accommodating more of London's identified 'development needs' (which includes market demand under current national planning policy) outside London would make a better contribution to sustainable development. Outside of the geographical areas mentioned above, CPRE does not believe that accommodating overspill from London should be a priority for either the London Plan or public policy more generally. Rather, more should be done in areas outside London to encourage discerning, indigenous growth and higher productivity based around local innovation and employment, thus enabling more attraction and retention of local workers. Current efforts by Local Enterprise Partnerships (LEPs) to produce Local Industrial Strategies may help this, and lead ultimately to the national Industrial Strategy being better informed by local needs and priorities across England.

6. Greater London is fortunate in that it is less constrained by national planning policy for housing than other areas of England. The approach outside London is based around continuing development patterns to follow recent population trends, which heavily favour further migration from north to south. The consequence of this approach is the Government's plans to build 1 million houses and spend £3.5 billion on supporting infrastructure between Oxford and Cambridge to 2050, of which around 200,000 of the houses would be to meet the needs of London commuters. We believe that this approach will be environmentally very damaging and a diversion from helping to regenerate other areas of the country.

7. As in the Thames Estuary, increased levels of development outside London could be encouraged by improved rail transport links. It is important not to be constrained by the wider South East - the question here refers to going 'beyond' the wider South East but little recognition of what this might entail is set out in either the draft Plan or the supporting evidence. CPRE believes that a national debate is needed on how land should be used and on what the overall pattern of spatial development should be, as indicated in our response to Matter 9. The completion of Local Industrial Strategies, and the promised establishment of the Shared Prosperity Fund, should help inform such a debate in 2019. We say more about how we think the GLA should address this issue in our submission under Matter 16.

CPRE
December, 2018

[1] MHCLG, *Independent review of build out: draft analysis*, June 2018.