



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

WIDER SOUTH EAST AND BEYOND (POLICIES SD2 and SD3)

Matter 16: (a) How, if at all, should the Plan address the matter of development and growth in the wider South East? (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?

1. CPRE has major concerns about how the draft London Plan addresses the issue of growth outside the boundaries of London, not merely in the wider South East but also beyond it. London is a world city and so the London Plan will have spatial impacts that affect the whole of England, not just the surrounding local authorities, counties or regions. Such debates are therefore of central relevance to the London Plan.

2. There is growing political concern about the chronic problem of an uneven spatial pattern of development in England as a whole. Central Government is seeking to address this through the establishment of national and local industrial strategies, and a Shared Prosperity Fund to support local industrial strategies. In recent months concerns have also been raised about regional disparities being actively exacerbated by central Government funding programmes on housing and transport[1], with relatively more resources allegedly flowing to London and the South East in comparison to other, relatively poorer, regions.

3. CPRE believes that it is therefore critical to the soundness of the London Plan as to whether it shows an awareness of, and willingness to contribute to addressing, wider regional disparities in England, not just the 'Wider South East'. As we also state under Matter 13, we have major concerns about the 'strategic infrastructure priorities' for the wider South East that are set out in the draft Plan, and we oppose the inclusion of a number of road building schemes within them. Such schemes will cost billions of pounds each, for example the Ox-Cam Expressway is forecast to cost at least £3.5 billion. We do not believe such schemes are justified or likely to be effective in delivering public policy benefits, particularly because of countryside loss, increased pollution and congestion. They also impose significant costs on business as compared to options built around sustainable transport and intensification of high PTAL/potentially high PTAL areas. We also believe that such a long shopping list of road schemes is likely to become increasingly inconsistent with Government policy moves to better share investment across England as a whole. In particular, the 2018 Industrial Strategy White Paper pledges to '*take greater account of disparities in productivity and economic opportunity between different places, ensuring our investments drive growth across all regions of the UK*'.

4. Draft Policy SD3 does at least show a welcome recognition that the impacts of the London Plan are felt across the nation, by stating that the Mayor will work with governmental actors and other partners from 'beyond' the Wider South East as well as within it. But neither it nor draft SD2 suggest how such working should take place.

5. In the light of the national Industrial Strategy, we recommend that Sections A, B, and E of Policy SD2 should be altered to commit to set up joint forums and work with partners in other English city and county-regions and with central Government to agree priorities for strategic infrastructure investment, even if it is not necessary to involve these wider partners in every stage of formal consultation on local plan-making. The list of strategic infrastructure priorities should also be recast to focus on sustainable transport schemes that will also benefit the country more widely, for example completing electrification of the Midland Main Line.

6. CPRE supports the overall process set out in draft Policy SD2, but recommends the insertion of 'biodiversity and green infrastructure' as concerns where solutions will be sought. As part of this we would also recommend that the GLA seeks to encourage a strategic approach to managing the Metropolitan Green Belt (most of which is in the Wider South East) to realise the potential for increased green infrastructure provision is understood, an issue we also mention under Matter 13.

CPRE London

December, 2018

[1] On housing, see 'Metro mayors call for government housing investment', Inside Housing (www.insidehousing.co.uk) article dated 20 February 2018, and on transport see Institute for Public Policy Research, 'Transport spending has risen twice as much per person in London than in the North since launch of Northern Powerhouse' (www.ippr.co.uk) article dated 20 November 2018.