

# London Plan Examination in Public – Written Statement

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## Matter 16

### The Wider South East and Beyond

**M16. (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?**

#### Key points:

- In their current forms, SD2 and SD3 merely reflect and recognise the duty to co-operate.
- To be of use, they should go further and set out principles, agreed with surrounding local authorities, for this co-operation.

#### Evidence and further information:

##### 1. More detail and agreed principles needed

I believe that, to be useful, these policies need to reflect some principles of agreement between the Mayor and surrounding local authorities for development in the area around London, rather than just the intention to co-operate. Some potential issues for discussion are named (although integrating transport and housing planning is not mentioned) but this policy in general goes no further than reflecting the NPPF

Examples of statements of principle that could be negotiated and agreed between these parties and added to the draft London Plan, which would reinforce the other policies in the plan, could include:

- Integrating spatial and transport planning across boundaries to cut the high levels of car dependency seen in people who live in the areas that border London – significantly higher than those seen in outer London boroughs (see figure 1, below).
- Identifying areas for housing and regeneration according to the same principles of proximity to public transport as the Mayor's Opportunity Areas.
- Preservation of the Green Belt from inappropriate development that would have impacts on London's infrastructure. Most of London's Green Belt is outside the GLA boundary (as shown in figure 2, below), and the Campaign to Protect Rural England has published research showing that extensive low-density housing development in

areas just outside London are potentially set to add one million new car journeys a week on outer London roads.<sup>1</sup>

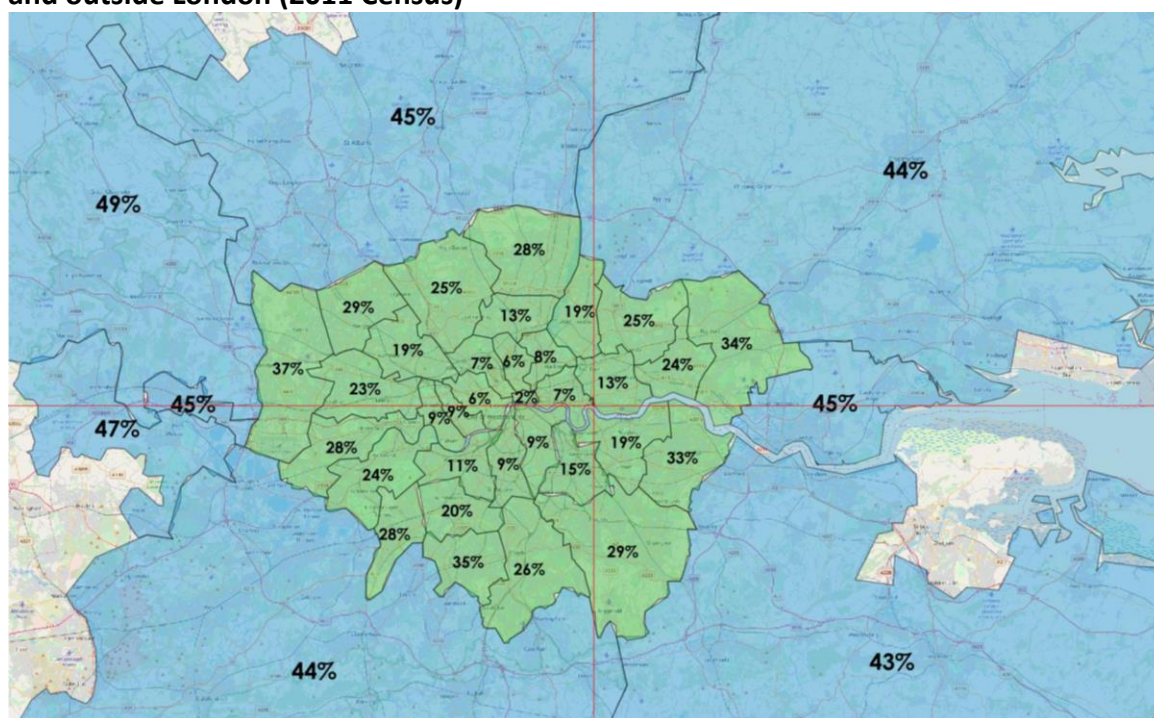
- Working together on policies for natural flood risk management in London's thirteen upper river catchments to help to reduce flood risk lower in the catchment. I welcome Policy SI12 and SD2 E which support this principle within the draft London Plan. However, this needs to go further with a map of suitable location and strategic targets for mass tree planting and other measures to hold back and slow rainfall discharge, and, as several London's tributaries extend to adjoining counties, collaboration is essential and should be reflected in this policy on co-operation.<sup>2</sup>

## 2. More plans needed to cut car dependency in adjoining areas and its impact on London

Paragraph 2.2.3 recognises the impact of the 800,000 commuters who live in areas outside London and work inside the GLA area, but the policies here do not reflect the housing pressures that exacerbate this, or set out clearly enough the need to work with other authorities to cut the high car dependency seen in many of their areas by planning transport and housing in an integrated way.

Data from the 2011 Census shows the much higher levels of car dependency, reflected in car-based commuting, in the areas surrounding London compared with the boroughs within it.

**Figure 1: Proportion of workers commuting by car (as driver or passenger) in areas within and outside London (2011 Census)<sup>3</sup>**



<sup>1</sup> Response to Mayor's draft Environment Strategy. CPRE London, 2017

<http://www.cprelondon.org.uk/>

<sup>2</sup> Re-forestation London upper river catchments. MQ 2016/0064, 20 Jan 2016

<https://www.london.gov.uk/questions/2016/0064>

<sup>3</sup> NOMIS database on 2011 Census – Travel to Work <https://www.nomisweb.co.uk/census/2011/wp7101ew>

In supporting text, the Plan should also state clearly that the Mayor does not support road-based infrastructure projects within the wider South East Strategic Infrastructure Priorities, and it should set out how he will seek to influence these.

Road-based projects, particularly in the Thames Gateway area will detrimentally affect outer London boroughs that border these areas, which already have higher car dependency than the outer London average.

Strategic infrastructure priorities that should be opposed in the plan therefore include:

- Expressway road link (Oxford to Cambridge)
- A27/M27/A259 corridor road expansion
- A217 and A13 corridor
- Lower Thames Crossing

**Figure 2: London's Green Belt lies mainly outside the GLA boundary**

