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Matter 93: Viability and delivering the Plan

Is Policy DF1 justified and consistent with national policy, and would it be effective? In particular:

- a) Would the policy be effective in helping to ensure the timely delivery of infrastructure to support development proposed in the Plan?**

We welcome the draft Plan's added clarity, over the current London Plan in regards to infrastructure funding and Plan delivery particularly in 11.0.3, however we would like to see further consideration and priority given to the funding of environmental and flood risk management infrastructure which is set out below

The Mayor has been driving forward work on infrastructure planning in London which we welcome. We continue to support this work to inform the inclusion of environmental infrastructure, as part of the High Level Infrastructure Group, through working with the Mayor's Infrastructure Coordination Unit, and through collaboration with partner organisations.

The Plan's evidence base requires development to ensure that environmental infrastructure, such as that for green infrastructure, flood risk management assets (our statement on Matter 72 also refers), drainage, and waste, is available and funded in a timely way.

We suggest that it would assist the Plan's delivery to develop a London Plan 'Implementation Plan'. This could detail interim targets / key performance indicators (KPI's), against Plan objectives by sector, given the reliance on partnership and collaboration for Plan implementation. (Our statement on Matter 94 recommends further environmental KPI's for the Plan).

- c) Is the infrastructure prioritisation set out in part D justified?**

We welcome the Mayor's Minor Suggested Changes to Policy DF1 A, which reinforces the requirement for development to be sustainable. The suggested wording encompasses a broader range of infrastructure requirements in support of relevant policies, than directly named in DF1 D. However, we remain of the view that that the policy, and subsequent

explanatory text, should reference 'flood risk management infrastructure' in identifying infrastructure priorities for applicants and decision-makers. This is key to delivering the Mayor's 'good growth' objectives, round delivering homes, a healthy city, growing the economy, and increasing resilience. As we point out in our statement on Matter 72, we cannot rely solely on the government to provide funding for flood risk management – beneficiaries will need to contribute.

More broadly, environmental infrastructure, whether to deal with tidal, river and surface water flooding, to provide treatment for wastewater, for waste treatment, or to provide green space, is essential to enabling sustainable and timely growth and to the delivery of the Mayor's London Environment Strategy.

We have concerns about how some of the figures for flood risk, water management, green infrastructure, and waste capacity, have been derived and represented, within the London's Strategic Infrastructure Requirements report¹. We are working with the Mayor's Officers to resolve this data to ensure all decisions are underpinned by sound and complete evidence.

There is currently no reference to flood risk management infrastructure under the '*Enabling Infrastructure*' heading (draft LP, Ch.10, para.1.1.34 on), and it is not clear that this is covered under '*Utilities*' at page 450, paras. 11.1.41 to 43. Clearly, assessment of, and investment in flood risk management infrastructure, amongst other environmental infrastructure, is key to the Plan's success.

We welcome the sections on '*Utilities*', (page 450), '*Green Infrastructure*' (pages 451-2), and '*Waste and Circular Economy*' (page 453).

Under '**Enabling Infrastructure**', following Policy DF1, we recommend the following:

- Add a new sub-heading and text covering '**Flood Risk Management**'. Here, the Mayor could signal his intention to, '*use the London Plan and his influence, particularly in locations subject to major growth proposals, such as the Opportunity Areas, to require local plans to highlight locations where flood risk management measures need to be raised / improved and built, and to investigate opportunities to deliver flood risk management investment through development*'.

This would support the implementation of the Thames Estuary 2100 Plan, and the boroughs' Surface Water Management Plans. It would further reinforce the Regional Flood Risk Appraisal's findings, and inform the preparation of Opportunity Area Planning Frameworks.

¹ EIP document NLP/SI/001 - [London's strategic infrastructure requirements - an evidence base to help deliver the Mayoral Strategies](#) (Arup, Jul 2017)

- Add to the sub-heading on '**Green Infrastructure**' at paragraph 11.1.45 on, referring to the government's 25 year Environment Plan, which underpins the Mayor's adoption of a Natural Capital approach. The text could also reference the Natural Capital Report of green spaces, which will inform further work in developing London's Natural Capital approach.

We further recommend that the Mayor's '*London's strategic infrastructure requirements - an evidence base to help deliver the Mayoral Strategies*' (Arup, Jul 2017) report should be used as a reference in Policy DF1's explanatory text, and that borough's priorities for funding are linked to this. This may include, where key to Plan delivery, prioritising environmental infrastructure projects, such as that for improved flood defences, sustainable drainage, or green space where this would enable sustainable and timely growth.

The consideration of environmental infrastructure requires early assessment by boroughs at a local level, to support the strategic funding priorities identified by the Mayor, and to evidence local and neighbourhood plans. This would be achieved by inclusion of environmental infrastructure in Development Infrastructure Funding studies (DIFs), and consideration in the Community Infrastructure Levy (CIL) process.

In regards to the new homes targets (draft LP, Ch.4, Table 4.2), we note that in many London boroughs, a significant proportion of new homes delivery is expected to be on 'small sites' of under 0.25 hectares in size. This may result in more complex and piecemeal funding of strategic and local environmental infrastructure, through CIL, and through planning agreements. This reinforces the importance of cross-boundary collaboration.

We suggest it would strengthen Ch.11, '**Funding the Plan**' to add explanatory text to support Ch.2, Policy SD2, encouraging Local Authorities to co-operate with each other, across administrative boundaries, on producing joint DIFs, where joint investment would enable more effective and timely strategic infrastructure delivery. Such collaboration would help to avoid planning delays and debate over viability and potentially spread costs.

We have no comments on the Panel's question b).