

M10. Should of the vast majority 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 wholly within London justified and would so doing contribute to the objective of achieving sustainable development?

10.1 The 2012 NPPF requires plans to *“proactively drive and support sustainable growth.....[and that] Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth¹unless – any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework.²*

10.2 The draft London Plan’s overarching objective is to deliver Good Growth – growth that is economically and socially inclusive, and environmentally sustainable. In seeking to meet the majority of London’s overall development needs within London, while recognising that London is closely linked to its surrounding area, the draft Plan is delivering on the three dimensions of sustainable development set out in the 2012 NPPF.

10.3 The population of London is projected to grow to 10.8 million by 2041³ and employment is expected to increase on average by 49,000 jobs per year, reaching 6.9 million by 2041⁴. The draft Plan is underpinned by interlinked evidence on housing and employment capacity, and supply and demand requirements for industry, office and retail floorspace. The advantage of strategic planning is that it allows London to focus development in the most sustainable locations, allowing all of London’s land use needs to be planned for with an understanding of how best to deliver them across the capital, ensuring that London can function effectively as a whole.

10.4 The approach to accommodating identified development requirements has been developed over a number of years and has been informed by a wide range of research and engagement with stakeholders. Work on the evidence base to inform the draft Plan started in 2015, following the adoption of the Further Alterations to the Plan (FALP). The Inspector’s report for the FALP raised concerns about the ability of the approach to growth adopted in FALP to continue to be relied upon, stating that a review should be undertaken immediately, and that *“meeting the pressing need for housing in London will require new, innovative and possibly unpopular solutions”⁵*

10.5 The GLA’s 2050 Infrastructure Plan⁶, developed in 2014, explored a number of spatial scenarios for growth, focusing on:

- Opportunity Areas;

¹ NLP/GD/03 DCLG, National Planning Policy Framework 2012, paragraph 17

² ibid

³ NLP/DEM/001GLA Intelligence, GLA 2016 Based Trend Population Result July 2016

⁴ NLP/DEM/004 GLA Intelligence, Experimental Employment-led Projections, July 2018

⁵ Report on the Examination in Public into the Further Alterations to the London Plan, Mr A Thickett, 18 November 2014 paragraph 42

⁶ NLP/EC/020 Mayor of London, London Infrastructure Plan 2050 July 2014; NLPEC/020b Mayor of London, London Infrastructure Plan 2050: Transport Supporting Paper July 2014

- increasing density in areas well connected to public transport;
- town centres;
- renewal of suburban housing; and
- increasing densities in the Wider South East.

- 10.6 While the scenario testing did not assess whether sites were deliverable or developable, it was useful in showing the potential capacity in certain areas of London. The scenarios suggested that there was potential to accommodate London’s future population growth by focusing solely on particular types of areas without going above the existing density ranges set out in the FALP for those areas. Both the town centres and suburban intensification scenarios showed significant growth potential in outer London, mainly because many of the town centres in outer London and suburban areas have densities below the relevant densities ranges.
- 10.7 This work informed early thinking on the spatial options for the draft London Plan. Another key piece of early work undertaken to inform potential options for meeting London’s growth was a series of density studies that sought to understand the role of increasing densities and the benefits and limits of that approach from a range of perspectives⁷. In addition, the work carried out by the Outer London Commission (OLC) – particularly their studies ‘Accommodating London’s Growth’⁸ and ‘Barriers to Housing Delivery’⁹ – helped inform potential spatial options for the draft Plan.
- 10.8 Alongside this, an early stakeholder event was held in March 2016¹⁰ that explored possible spatial options for meeting London’s growth, and their potential implications. The OLC work and the stakeholder discussions helped inform internal development of potential options for meeting growth requirements. Early internal modelling was also undertaken using existing data to understand the potential capacity to meet land use requirements, to inform the development of options based on future priorities in advance of more up-to-date evidence of need being available.
- 10.9 This work informed the City for All Londoners consultation¹¹, which set out the Mayor’s vision for how to accommodate London’s growth and which enabled a wide range of stakeholders to explore policy options for the draft Plan¹².
- 10.10 Building on the above work, the Integrated Impact Assessment more formally assessed alternative spatial options for accommodating London’s growth. The Scoping Report¹³ initially identified three alternative spatial options; however, following consultation and the development of internal discussions around the Good Growth agenda, these

⁷ NLP/DE/006 LSE, London Plan Density Research Project No.1: Defining Measuring and Implementing Density Standards in London, July 2016, NLP/DE/007 Three Dragons et al, London Plan Density Research Project No.2&3: Lessons from Higher Density Development, Sept 2016, NLP/DE/008 Three Dragons et al, London Plan Density Research Project No.2&3: Lessons from Higher Density Development Technical Report, Sept 2016, NLP/DE/009 Arup, GLA Density Project 4: Exploring Character and Development Density Final Report, May 2016.

⁸ NLP/PP/001 Outer London Commission, Accommodating London’s Growth, March 2016

⁹ NLP/HOO/005 Outer London Commission, Barriers to Housing Delivery, March 2016

¹⁰ For further details see the Mayor’s response to Preliminary Question 8

¹¹ NLP/CD/010 Mayor of London, A City for All Londoners Consultation, October 2016

¹² For more information on the City for all Londoners consultation see the Mayor’s response to preliminary question 8.

¹³ NLP/CD/03 Mayor of London, Integrated Impact Assessment Scoping Report, February 2017

options were broadened out to include a total of five options (see response to Matter 1). Detailed assessment¹⁴ concluded that ‘Sustainable Intensification’ was the preferred option, as it scored highly on a range of objectives. In particular, it would support the delivery of employment and residential space, enabling London to remain competitive, encourage efficient use of land, and ensure growth and economic diversification is facilitated. In promoting public transport, walking and cycling, this option also brings other benefits such as reducing carbon emissions and noise, and improving air quality. Other policies within the draft Plan would ensure that impacts associated with higher densities across London could be mitigated, particularly strong design policies and ambitious environmental standards.

Sustainable Development

- 10.11 The draft Plan’s approach of sustainable intensification contributes to the achievement of sustainable development by ensuring the building of a strong, responsive and competitive economy, supporting strong, vibrant and healthy communities, and contributing to protecting and enhancing the natural, built and historic environment¹⁵. Intensification can improve the city’s economic efficiency and productivity, increase employment opportunities through the agglomeration of businesses, and provide a critical mass to support social and physical infrastructure, including a more viable and efficient public transport network¹⁶.
- 10.12 London - particularly outer London – is a relatively low-density city compared with other world cities¹⁷, and will continue to be so even with expected growth. Higher densities in locations where local amenities are within walking and cycling distance and which are well connected by public transport will enable lower levels of private vehicle use and lower associated emissions/pollutants. Higher densities also support the development of heat networks and decentralised energy, which can assist with the transition to lower carbon energy systems¹⁸. Higher density places, where people live in closer proximity to services and amenities, also provide more opportunities for walking and cycling, improving people’s health. Large scale redevelopment, such as in Opportunity Areas, provides further opportunities to deliver new social infrastructure, such as schools and open space.
- 10.13 Intensification can also contribute to providing more – and a greater choice of – homes, helping to reduce social inequality and isolation by allowing people to remain within their local area. The housing targets in the draft Plan are based on housing capacity identified at the borough level through the Strategic Housing Land Availability Assessment (SHLAA)¹⁹, which takes into account the principles of sustainable development, considers the various environmental and delivery constraints on potential housing capacity and the demand for other land uses²⁰.

¹⁴ NLP/CD/04 Arup, Integrated Impact Assessment Report, December 2017

¹⁵ NLP/GD/03 DCLG, National Planning Policy Framework 2012, paragraph 7

¹⁶ NLP/PP/001 Outer London Commission, Accommodating London’s Growth, March 2016

¹⁷ NLP/EC/001 GLA Economics, Economic Evidence Base, 2016

¹⁸ NLP/PP/001 Outer London Commission, Accommodating London’s Growth, March 2016

¹⁹ NLP/HOU/002 Mayor of London, 2017 London Strategic Housing Land Availability Assessment (SHLAA),

²⁰ See NLP/HOU/002 Mayor of London, London Strategic Housing Land Availability Assessment (SHLAA) 2017, GLA for more information.

- 10.14 The policies in the draft Plan have therefore been developed to deliver sustainable development, explicitly recognising that development needs to be managed in a way that ensures that it benefits all Londoners. The Plan seeks to ensure the delivery of good design, recognising that it is a key aspect of sustainable development and that it is ‘indivisible from good planning’²¹, as stated in 2012 NPPF.
- 10.15 The draft Plan also seeks to protect the Green Belt and Metropolitan Open Land and focus development on brownfield land through making the best use of land. Protection of the Green Belt also assists urban regeneration and the recycling of derelict urban land²². The draft Plan particularly emphasises the importance of co-location and multi-use of facilities to ensure land is used efficiently and helping to facilitate opportunities for different groups of people to come together, encouraging further inclusion and community participation.
- 10.16 As required by paragraph 8 of the 2012 NPPF, draft Plan policies seek to ensure that individual elements of sustainable development are not focused upon in isolation. For example, as paragraph 23 of the 2012 NPPF recognises, increasing residential development in and around town centres, can play a contributing role in ensuring the vitality of centres, and focusing development in accessible locations increases the use of public transport, walking and cycling, improving the health of Londoners and reducing carbon emissions. The Good Growth policies in particular ensure that different elements of sustainable development are considered throughout the Plan.

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?

- 10.17 Whilst it is recognised that there are links between London and the wider south east (WSE), pursuing an alternative spatial strategy where more development needs are accommodated outside of the city is likely to be less sustainable²³.
- 10.18 The draft Plan does accept that some development needs may be met elsewhere – for example Policy E7 is clear that some industrial functions which serve London (as well as the WSE) could be met outside London. In addition, as discussed in response to M19, it may be that some of London’s housing need (up to 10,000 units - 1.5% of London’s housing need - over ten years) may need to be met outside of London. The Mayor is seeking willing partners in the WSE to investigate the potential of meeting some of this need in sustainable locations in a way that supports mutual aspirations for growth, which includes economic growth as well as housing growth. It is prudent for the Mayor to plan for longer term contingencies, particularly given the time it takes to develop willing-partner relationships and for new transport infrastructure to be put in place, which will likely be required to deliver increased development capacity in London and beyond.
- 10.19 However, given the capacity identified in London through the evidence base, and the approach to sustainable development set out in the draft Plan policies, it is not necessary to meet a larger element of London’s need in the WSE. Moreover, delivering less in London and more in the WSE is not likely to optimise opportunities for

²¹ NLP/GD/03 DCLG National Planning Policy Framework 2012, paragraph 56

²² NLP/GD/ 03 DCLG National Planning Policy Framework 2012, paragraph 80

²³ See NLP/CD/04 Arup, Integrated Impact Assessment Report, December 2017

sustainable development because development would be encouraged over a wider area, thereby increasing the need to transport more goods, services and individuals over a wider area, leading to negative air quality and climate change impacts and potentially increasing the size and range of investment in transport infrastructure required.

- 10.20 By continuing to develop within London, the city is able to capitalise on historic and ongoing investment in existing transport infrastructure, whereas investment in transport infrastructure outside of London would mean investment in new infrastructure, which is significantly more expensive for the resultant uplift in development capacity. Development outside London may also not make the best use of land because of the connectivity and prevailing densities. In addition, meeting more needs in the WSE may lead to the loss of Green Belt outside London and would detract from regeneration objectives, focusing development on brownfield land, which is inconsistent with the 2012 NPPF²⁴.
- 10.21 It should be acknowledged, as set out in the SHMA, that a significant amount of migration occurs to and from London. Many people do, and will continue to, move from London to the WSE and beyond; some continue to work in London, while others will seek employment closer to their new home. Such migration trends are a key component in all SHMAs, including those for places outside of London.
- 10.22 It should also be recognised that the population of London has increased despite insufficient increases in the housing stock²⁵. This has led to increased pressure on existing housing stock and, at the extreme, “beds in sheds” and severe overcrowding²⁶. Issues of affordability in London have also led to a large proportion of the housing need being for affordable housing. Building homes in the WSE may meet some of London’s pent up market demand, but this is not guaranteed; it may simply reduce the pressure on the stock of the WSE authorities or better meet their backlog needs. If the homes in the WSE were to meet some of London’s affordable housing need, there would need to be a nomination/allocations process that would involve some people being forced to move out of London, away from family and support networks and potentially away from employment opportunities. Moreover, there are already concerns about the resilience of the city, due to the proportion of the emergency service workforce who live outside of London and the knock-on implications the nature of shift working can have on levels of people commuting into London by car²⁷.

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?

- 10.23 As set out above, it is not necessary to accommodate more of London’s growth in the WSE.

²⁴ This is discussed in more detail in the IIA - NLP/CD/02 Mayor of London, Integrated Impact Assessment Scoping Report, February 2017.

²⁵ NLP/DEM/001 GLA Intelligence, GLA 2016-Based Trend Population Result, July 2017

²⁶ Mayor of London, Housing in London, 2018

²⁷ <https://www.londonchamber.co.uk/LCCI/media/media/Reports%20and%20Surveys/Living-on-the-Edge-Housing-London-s-Blue-Light-Emergency-Services-Report.pdf?ext=.pdf> and <https://www.london.gov.uk/press-releases/mayoral/significant-and-wide-ranging-independent-report>

- 10.24 The Mayor has no jurisdiction outside London and there are no statutory governance structures in the WSE that allow for decisions to be made on a regional basis.
- 10.25 The Duty to Cooperate in theory provides the legislative framework for working together to address strategic issues in the absence of regional government. However as discussed in response to M4 (PQ7) and M5 (PQ8), while the Mayor believes that the Duty to Cooperate does not apply to the preparation of the London Plan, the Mayor has been working with partners across the WSE. The voluntary collaboration arrangements set up by the GLA, SEEC and EELGA in 2015 have significantly improved joint working (see responses to M5, M6, and M16). However, there are up to 130 individual districts with which the Mayor would need to have agreements if they were to be required to meet any of London's need, and not all districts/counties engage with the collaboration arrangements. Therefore, without formalised regional governance arrangements (supported by legislation and national Government) and the ability to ensure the delivery of the strategic infrastructure required to support growth there is neither the incentive, requirement or practical arrangement for authorities in the WSE to work with London to consider strategic growth requirements, beyond the willing partners approach currently being pursued in practice and promoted by the draft Plan.