

## M10 written statement from Just Space (2718)

M10. 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?

The Plan tries to appear to be meeting most of its housing needs within its boundaries only by spreading the backlog of need over a quite unacceptable 25 years. By shifting focus away from low cost rent where the need and the backlog are concentrated, and with the social housing stock shrinking, the Plan is most likely to worsen its backlog. That is not sustainable development or good growth.

The evidence is that total housing net output is most unlikely to double or triple from current levels as the Plan envisages: the opportunity cost of diverting and densifying land on the necessary scale is against it; there is no adequate funding stream from the present government to support the necessary scale of low cost rental expansion and no indication that private market agents or RSLs will do it.

In one sense London's failure to meet its entire needs within its boundary does not matter. The Mayor needs to pretend that this is possible to satisfy the requirements of the NPPF. But London's housing pressures have been spilling out to regions near and far for decades and will undoubtedly continue to do so, further propelled by Crossrail 1 and (if it is built) Crossrail 2.

But it **does** matter for two reasons: (i) the cost and environmental impact of all that extra travel is **bad growth** by any standard, and borne by people in all income groups, and (ii) the massive pressure exerted by the targets are a grave threat to good growth in London in the ways outlined in our evidence on other Matters: pressures on every other use of land, green and play space, estate regeneration, industrial land, workshops and high streets. The imperative for maximum output also drives density far higher than many citizens want and higher than is environmentally sound. And by driving up land values, it inflates the cost of all forms of housing production.

We do not accept that the growth embodied in the projections should be welcomed. The Mayor should be in discussions with other countries and regions beyond the WSE, pushing for national policies which take pressure off London.

The consequences of seeking to meet all of London's needs (at the planned rate of growth) within the GLA boundary are unacceptably high. It should not be accepted.

. 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?

Measures which re-balanced activity across the UK could be highly beneficial in reducing inequality of opportunity and of outcomes, but would need to be planned with careful attention to minimising the need for travel. Simply planning for overspill of London's unmet needs to adjoining regions threatens an increased need to travel and spreads affordability problems to wider areas.

. 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?

In the context of current policies and existing institutional frameworks we consider such an outcome highly unlikely. More likely that London pursues its relentless expansion of measured economic growth and exports more and more of its un-met housing needs to adjoining regions, with strong adverse effects on those squeezed out, those already living in the receiving areas and with negative environmental effects through the growth of travel and the car-dependence of most settlements in the wider regions.

It would be perfectly possible to devise a strategy to develop new or expanded settlements on a large enough scale and with good enough public transport to avoid car-dependence, and to do so with a housing stock affordable to the whole population. But this could not and would not be done in the context of today's national policy and legislation.

The planning by bilateral consensus now going on in corridors, notably Cambridge/Stansted, risks being of this kind. (see comment on SD3 in Matter 16.)