

M12. Is the broad spatial distribution of housing and employment development proposed in the Plan, including between inner and outer London¹⁰, justified and would it contribute to the objective of achieving sustainable development particularly in terms of minimising the need to travel and maximising the use of sustainable transport modes; building a strong, competitive economy; creating healthy, inclusive communities; and respecting the character and appearance of different parts of London?

Employment

Just Space has always argued that the continuing centralisation of jobs in the CAZ (and Canary Wharf) and the relative and sometimes absolute draining-out of jobs from inner and outer suburban London is a mistake. The draft London Plan envisages further worsening of this centralisation. We oppose it. We have given careful thought to alternatives and have sought — unsuccessfully — to have an alternative community-generated spatial strategy evaluated as part of the IIA: <https://justspacelondon.files.wordpress.com/2018/12/london-plan-ii-a-spatial-option-4.pdf>

Our objections are economic, social and environmental:

The argument for centralisation is a loose and unevidenced application of ideas about agglomeration economies. However, London has no mechanism or way of measuring the positive and the negative consequences of more and more agglomeration. The city may already have passed the optimum point of agglomeration and the negative effects — air quality, congestion, rising rents and property costs are all at damaging levels.

The other economic aspect of the centralization where we are alarmed by the evidence is qualitative: the jobs London loses when employment premises in inner and outer suburbs are converted to housing are very diverse, usually filled by relatively local people, especially valuable to people with young children — especially women — and generating a very diverse range of products, repair and recycling services and other services. In our comments on the mayor's economic strategy and on Chapter 6 of this draft Plan (Just Space submission, pages 55-69) we discuss at length the need to stem the losses of such crucial parts of London's diverse economy. The obverse of this argument is that we argue in our evidence that London is at risk of over-dependence on financial and business services activity which is almost entirely in the CAZ/CW.

The social dimension of the argument is that the employment losses beyond the CAZ are socially damaging. They span a big range of working class occupations including not just production but also caring, security, transport and retail work — all of which are essential to London's life, but all of which are vulnerable to displacement. The price is paid by the workers who lose their jobs and by their families since the alternative or relocated jobs are often much further out of London, or people have to travel to the CAZ. The impacts on ethnic minorities can be especially severe.

The other social penalty London pays through this strategy is that suburban employment loss (in town centres, other high streets and the land behind them, local parades and scattered jobs) is a loss of the services provided and this undermines the 'lifetime neighbourhoods' which have been such a valuable aspiration and (sometimes) achievement of the previous plan.

The environmental damage flows from the extinguishing the often-short trips associated with non-central jobs and adding jobs in the CAZ/CW for which journey distances, times and costs are typically much higher. This is the opposite of reducing the need for travel.

The EiP does not afford the space for detailed impact evaluation of the alternatives. Our case is that the IIA should have undertaken this work and has not done so. The draft Plan is seriously deficient as a result, and unsound in planning procedures.

Housing

There are some difficulties in responding to this aspect of the matter as it is posed; but these issues speak to its core concerns.

Firstly, while there is consistent use of “inner” and “outer” London to distinguish the implementation of policies, there is no dedicated consideration in the plan of what these areas are, why they should be so distinguished, or why this distinction makes sense to retain. The definition of “outer London” in Annex 2 is confined to listing boroughs. Given the complex evolving geographies of these boroughs, and the need for all residents of London to access the requirements for sustainable development, it is challenging to see that this blunt and ineffective (unsound) definition justifies the distinctions proposed in spatial policies. Consequently, a raft of policies apply differentially to different parts of the city. This is not justified.

Secondly, a key spatial policy intensely and directly relevant to addressing this matter, as we note in our submission (p. 16-17) is not included in Chapter 2 on Spatial Development Frameworks – Policy H1 B2 (a), which involves potential intensification of any site in all areas of London within 800m of a town centre or station. The lack of attention to intensification as spatial strategy, and implications for the overall spatial distribution of housing and employment, as covered in this matter, is a significant omission, and is unsound, failing to consider the implications of relevant aspects of the policy. This policy H1 B2 will exacerbate the trends which we are concerned with, namely the disproportionate impact of the spatial development strategy on certain communities. Maps 4.2. and 4.3 indicate that this policy will bring an additional focus on areas of the city which are disproportionately those of strategic regeneration areas, where the poorest communities live. The impacts of displacement, loss of valuable family housing and green space will be potentially cumulatively significant, and potentially bring further disadvantage to the poorest residents of the city. We note in our submission that,

“In addition, and not included in this chapter, is the new suggestion in Policy H1 (B2a), for “incremental intensification” (4.2.5) which identifies “sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m of a Tube station, rail station or town centre boundary” ... for optimizing housing delivery potential on such sites as small housing sites, brownfield sites, strategic industrial land, surplus public sector and utility sites, low density commercial and retail uses etc. Maps 4.2 and 4.3 therefore represent another spatial pattern of development which should be considered relevant to Chapter 2 and therefore the maps and discussion of them should be located in this chapter on Spatial Development Patterns; or integrated in and referred to in the discussion of spatial development patterns. This is particularly important to ensure that different elements of spatial change in the city are consistent in terms of how their differential impacts on neighbourhoods, communities, and existing uses and assets are assessed and treated in policy and delivery.”

As there is no framework for assessing the cumulative impact of this policy on different population groups, or ensuring that cumulative changes (large-scale development by stealth) can be appropriately subject to participation in planning decisions (early and effective) we suggest that this proposed spatial distribution of housing and employment distribution is unsound.

We note that intensifying land use in accessible areas across the city will lead to “increasing housing provision in accessible parts of outer London to help address the substantial housing need in these areas and deliver market homes in more affordable price brackets” (4.2.2). Text 4.2.5 also relates. However, this will be limited by the poor transport networks, including the lack of adequate orbital connections. We note the amendment in the new draft on p. 107, and note 46a that the 800m radius for development will now be in relation to town centres and all public transport stations (tube, rail, DLR and tram). **New spatial modelling of this impact across the city needs to be presented for review to update Maps 4.2 and 4.3 – the spatial impacts of this cannot be assessed without evidence.**

The circular nature of this definition is apparent in many developments across London where future transport improvements are cited to support intensification in currently low PTAL areas. A stronger attention to the potential for transport improvements in “outer London” would be relevant.

We note in our submission that, “The emphasis placed on access to public transport within the density matrix brings with it the danger that we lose sight of the higher goal whereby people can satisfy their daily needs of work, shopping and recreation within walking distance and only have to rely on mechanised transport for more occasional needs — the ‘walkable city’ concept which, among other things, is more energy efficient. Density levels can be optimised to help achieve the zero carbon city, but they should be sensitive to the needs of all communities, and all communities, including all household sizes and incomes, must have the facility to live in all parts of London.”

Thus we note the strong intensification of developments close to transport nodes, and the destruction of local businesses, amenities and services is NOT producing a sustainable city or minimizing the need to travel, but is in fact creating a stronger need to travel. Furthermore, through centralizing economic activity (see above) this plan is exacerbating the distance between home and work and creating a less sustainable city.

We have suggested in the Just Space “Towards a community-led plan for London” that transport improvements in Outer London will be important to spreading potential for provision for housing and jobs more widely. Just Space have proposed that the Mayor “Promote Active, Affordable, Integrated and Accessible Travel that is the alternative by choice to car dependency: more investment throughout London in walking, cycling and accessible transport, and in Outer London in public transport services, particularly bus services and Orbital Rail.” We propose commitment to “lifetime neighbourhoods in Outer London (p. 54-56) with stronger integration of work and home, less need for lengthy commutes – all of which will benefit from enhanced transport accessibility. Internationally, well managed and dedicated bus routes and not only hard track rail provision have been shown to be effective mass transit systems.”

We have noted at length in our submission how the spatial policies of the London Plan will undermine rather than reinforce healthy, inclusive communities.

In relation to the future distribution of affordable housing across the city, based on the Viability Study this plan will exacerbate continuing disparities between inner and outer London in terms of the uneven distribution of social rent housing. The startling thing about a plan without a financial plan except for planning gain is that low value land is seen as least viable for developing low cost affordable and social rent housing (London Plan Viability Study, p. 102). The consequences of this for continuing destruction of well-functioning communities in inner London are alarming. Low-cost housing should be brought forward in areas with affordable land and good amenities. A strong plan for delivery of social rent housing in areas of low land costs is recommended.