

Written statement M13 by Just Space (2718)

M13. Would the Plan be effective in ensuring that adequate physical, environmental and social infrastructure is in place in a timely manner to support the amount and type of development proposed? In particular:

a) Is the development proposed in the Plan dependent on the provision of the infrastructure identified in the London Infrastructure Plan 2050 [NLP/EC/020]?

1 Although the IP2050 was labelled “a consultation” there was no EiP or public scrutiny of the document. Just Space was highly critical of the IP at the time [our submission in full is at <https://justspacelondon.files.wordpress.com/2014/11/js-response-to-ip-20141106.pdf>] and we do not consider it to be a sound evidential basis for the draft Plan. In brief we said, and we say:

- a. long-term planning for infrastructure is a good thing;
- b. this is not a good example of planning, however, because...
- c. it appears to be based in investor demands rather than Londoners’ needs;
- d. the Board proposed to oversee implementation has no community representation and important questions concerning London’s governance are not addressed;
- e. removing Infrastructure issues into a relatively private sphere means there is much less public scrutiny than we have for the London Plan with its EiP system;
- f. there are methodological failings in the forecasting which prevent this plan from being an exploration of alternative futures;
- g. equalities dimensions are comprehensively missing;
- h. reducing the need to travel has insufficient emphasis, indeed the anticipated concentration of jobs in the centre alongside the sacrifice of employment space in the suburbs would take London in the opposite direction.
- i. We do not consider that the proposals in the Infrastructure Plan (IP) amount to a strategy for sustainable development for a variety of reasons elaborated below [i.e. in the full submission].

We have asked for our full submission in response to the ***Infrastructure Plan 2050 consultation*** (linked above) to be added to the Examination Library.

2. Yes the development in the Plan is heavily dependent on the timely provision of the infrastructure (roughly) as indicated in IP2050, and also on forms of social infrastructure ignored or underplayed in the IP – see (c) below.

b) If so, is the strategy justified and would it be effective, bearing in mind that the delivery of some of the infrastructure projects is not certain and that there is an identified infrastructure funding gap of at least £3.1 billion per year?

1. We plan to comment in detail on funding & viability of the plan as a whole (with and without OAs) at Matter 92/93 towards the end of the EiP.

2. This is a type of strategy, heavily dependent on centralisation of jobs and dispersal of homes, which requires additional radial transport capacity to relieve congestion already at discomfort levels and expected to worsen. Alternative strategies based on getting jobs and services nearer homes, reducing the need to travel (&/or the frequency of travel) have not been elaborated or evaluated, as we argued in Matters M1-M3 about the IIA. Without such an analysis of alternatives this strategy is not justified. In particular the environmental sustainability of the alternative infrastructure strategies – and their attendant travel patterns and environmental impacts – has not been explored. Our heightened awareness of the urgency of the global warming threat should prevent such an untested infrastructure plan from being adopted.

c) What, if any, strategic infrastructure other than that identified in the London Infrastructure Plan 2050 is likely to be needed to support the development proposed in the Plan?

1. Responding to the IP2050 consultation we wrote: “The IP is seriously deficient in not systematically considering London’s needs for **social infrastructure**: while there is some consideration of schools, there should be careful (and spatially localised) analysis of health services, care homes, children’s play and daycare, community halls and so on. These needs of Londoners are now properly considered strategic in the London Plan process (and linked with the Mayor’s commitment to Lifetime Neighbourhoods) and have a clearer claim to be “infrastructure” than does housing.”

2. We were also highly critical of the IP2050 for failing to provide adequately for investment in walking and cycling infrastructure.

Added document: Just Space response to the IP2050 consultation:
<https://justspacelondon.files.wordpress.com/2014/11/js-response-to-ip-20141106.pdf>