

Written Submission from LSE London (London School of Economics, ID 845) on Matter M1 for consideration in the Examination in Public of the New London Plan, 2019

1. Introduction and overview of the submission

This submission focuses specifically on one (fundamental) issue assessed by the NLP's Integrated Impact Assessment - that of the choice of an appropriate spatial strategy – in relation particularly to the Panel's question whether the assessment is '*suitably comprehensive and has .. sufficiently evaluated reasonable alternatives*', with very secondary concern for whether it '*provide(s) a basis for future monitoring*' and whether its '*recommendations .. (have) been adequately addressed within the Plan*'.

The key importance of this issue within a *Spatial Development Strategy for London* is almost self-evident, but more crucially so for this New Plan, prepared in the wake of a critical Inspector's report on the last (FALP) version of its predecessor which:

- distinguished clearly between actual *delivery* of new housing and assessed supply *capacity*, saying that "the existing London Plan strategy would not *deliver* sufficient homes to meet objectively assessed need" and
- identified a consequent need to explore spatial options "*beyond the existing philosophy of the London Plan*", including engaging with planning authorities across a wider region to discuss the capital's evolution¹.

Despite that background, our contention is that the treatment of alternative spatial strategies within the IIA – and in the preparatory planning/analytic work leading up to that assessment - was wholly inadequate in its evaluation of 'reasonable alternatives'. This judgement is partly a matter of the evidence base and how it was used, but more fundamentally about the reasonableness of the set of alternatives considered. We take this to require consideration of a range of qualitatively different approaches *but* with a common requirement that they are likely to satisfy basic pre-requisites - specifically in this case a likelihood that they could secure delivery of the broad scale of residential development that is required.

That is (at least) extremely questionable for options cleaving to the 'existing philosophy' - given both the past record and the admission in the (revised version of the) London Housing Strategy that the required 'doubling of the rate of homebuilding cannot be achieved within the existing homebuilding model'². But it applies to the other options considered in the IIA because of the narrow way in which these are defined.

It is hard to see, either in the text of the IIA, or in the way that responses are addressed, signs of any systematic use of data to underpin comparisons of the alternatives. This represent a general failure of preparation for the IIA, but one which must have biasing effects for the subjective evaluations that are presented. For the spatial alternatives which are, or might have been, considered in the IIA, the team could only have access to ones representing minor variants on the established 'compact

¹ Thickett, A., *Report to the Mayor of London on the Examination in public of Further Alterations to the London Plan*, Planning Inspectorate, DCLG. November 2014; Paras 54-58, our emphases.

² Mayor of London, *London Housing Strategy, revised version*, GLA, May 2018, para. 8.29.

city' philosophy of Mayoral Plans, which on the basis of its track record since 2004 has a very low prior probability of delivering required levels of residential development. That fact is nowhere registered in the IIA, and (regrettably) its text suggests no effort to assess whether policies proposed in the Plan could be expected to yield much more positive outcomes than earlier versions of this strategy had managed to. For other alternative strategies the prior work had simply not been done to permit any systematic objective comparison. The grounds for their rejection are purely judgemental, and/or related to prior policy commitments (in relation particularly to Green Belt) with bases that show no sign of having been analysed during the IIA (or before/after).

The substance of the arguments for/against alternative spatial strategies – and the chances of their actually being able to deliver required/target rates of growth in the dwelling stock – are on the EIP agenda for subsequent Matters (including M10, M11, M16 and M19) on which we are making submissions. Our argument here is essentially a procedural one: about the conduct of the IIA; limits/biases in the preparatory work for it; and a total lack of attention to the delivery question. Together these have led to endorsement of a spatial strategy (of sustained intensification) which would not be expected to deliver what it is supposed to, and a lack of serious consideration to complementary approaches which could be made to produce substantially better outcomes.

2. Identifying and Comparing Alternative Strategies

As just noted, the Inspector's report (2014) on the current version of the London Plan was critical of its spatial strategy, approving the FALP only on the basis that it improved on previous versions of the Plan and that an immediate review of the Plan be initiated, including exploration of wider regional relations and possibilities.

Probably because a Mayoral election was due within two years, that review did not take place. But the Mayor's Outer London Commission was charged with producing a set of reports (on issues of delivery, strategy and regional collaboration) to provide an informed input into development of a New Plan under whichever Mayor was elected in 2016. That on accommodating growth outlined a range of ways of reducing the housing supply gap, embodied in a threefold approach incorporating

- greater efficiencies in the way existing capacity is used;
- sustainable intensification of selected parts of the city; and
- partnership working to realise the potential of the wider metropolitan region³.

Both the second and third of these suggested strategic reviews of Green Belt (inside and outside London, respectively), with some co-ordination being offered by the Mayor (perhaps on the basis of S30 of the GLA Act). Within London this might involve the New Plan offering 'a consistent methodology/principles to coordinate and provide a strategic dimension to boroughs' local Green Belt reviews'⁴, while outside London active work with 'willing partners' would seek the same, particularly in relation to growth corridors and strategic infrastructure investment⁵.

The set of alternative strategies outlined in the Scoping report for the IIA echoed the OLC threefold approach, with Current London Plan, Sustainable Intensification and City Region versions (though London Green Belt review figured only in the third of these)⁶. These were nested, so that the second and third incorporated all of the one/two before – with the City Region approach most closely

³ Outer London Commission 7th report: *Accommodating London Growth*. March 2016 (London: GLA), para 0.2.

⁴ OLC 7th report recommendation 26.

⁵ OLC 7th report, recommendation 29.

⁶ GLA *Integrated Impact Assessment of the London Plan: IIA Scoping Report*, February 2017.

corresponding to that of the OLC. The choice between this set might be understood (reasonably) as reflecting how much modification of the Plan's philosophy would be required to secure delivery of the additional housing implied by population forecasts.

That logic completely vanishes, however, in the actual IIA report, where versions of the Current Plan with more dispersed (polycentric) employment growth and a weak ad hoc version of Green Belt release are added, and Sustainable Intensification is separated both from these and from the City Region approach. Given that only Sustainable Intensification – essentially a beefed-up version of the Current Plan – is specified in a way that clearly suggests significantly more development, it is then quite understandable that it emerges from the soft/subjective evaluation as the 'preferred option' (for GLA and the IIA consultants).

Though it is impossible to infer from the IIA report what evidence may have been used, objective comparison of these 'options' would necessarily have been limited, since two key preparatory studies for the New Plan, the 2017 SHLAA and the TfL Transport Modelling report⁷ were geared to a single strategic framework, close to that which would come to be 'preferred' by the IIA and the GLA. In the case of the SHLAA this seems to have represented a political LPT reality judgement, in a situation where the London Mayor's expressed policy position was opposed to development in the London Green Belt, and relations with potentially willing partners elsewhere had not reached a point where comparable data on potential development sites outside Greater London was available. In the case of the TfL work it was simply geared to SHLAA-consistent population projections.

GLA responses to an FOI request indicate that no other significantly relevant data sets were provided to the IIA consultants that would have allowed them to fill in the gaps with respect to possible outcomes for strategies involving development on strategically identified sites within the London Green Belt or outwith Greater London. Assessments of these options and their relation to ones seeking to concentrate development within London had thus to be rooted almost entirely in 'professional judgement'/impressions rather than any kind of systematic/integrated analysis.

Crucially, there are no indications that the IIA team had access to, or undertook analyses for, evidence on how adequately any one of the spatial development options (or perhaps combinations of them, though this was not considered) could be expected to perform on the housing delivery test. The one thing that we do know, from the passage in the revised London Housing Strategy cited earlier is that the Mayor does not believe the 'preferred'/chosen spatial option can deliver the required doubling (at least) in housing output – without a new 'model', involving central government support (in finance and powers) that has not been signalled as likely.

3. The IIA Process

Assessment of the NLP's spatial strategy highlights two general questions about the IIA process. These are, respectively, whether:

1. the basic function is to assist authors of a Plan to enhance its acceptability; *or* to provide an independent testing of component policies, their likely impacts and analytic base ?; and whether

⁷ Transport for London, *Strategic Transport Modelling: Part of the London Plan evidence base*, GLA, December 2017

2. The basis of checking/testing elements of the Plan is in terms of compliance to practise norms; or empirical evidence as to likely effects, and the processes underlying these ?

Understandably for broad strategic issues such as the that of spatial options, the likely bias is towards collaboration rather than challenge – since the IIA team will be dependent for relevant evidence, models and analyses on what the Plan team have, and make available, and since reality judgements will often relate to political processes.

The bureaucratic setting also makes a reliance on formal norms more likely than not, which can be really counter-productive where planners are (just) one of the actors in a complex market situation that they are seeking to order, while private agents have different strategic concerns.

In this case at least the outcome has been to produce an assessment that is entirely unchallenging, with uncertain authorship, and which – in relation to the delivery/capacity gap - entirely misses the reality signal provided by the FALP Inspector's report.

4. Conclusion

In relation to the choice of spatial strategy, we would argue that the New London Plan's IIA assessment is not fit for purpose, in failing to provide a sufficiently comprehensive and objective evaluation of relevant alternatives, in relation to challenges that had been known since the (2014) EiP of the FALP. This failure is not specific to the IIA process itself, but also reflects lack of serious prior attention to such relevant alternatives. If, as will be argued under other Matters, the Plan's housing development aspirations are seriously (and unhelpfully) lacking in credibility, inadequacies in the IIA nevertheless bear part of the responsibility for this.

On the Panel's two supplementary questions, we simply record that in relation to this issue the IIA neither offers significant advice for the Plan team to consider taking on board, nor offers any basis or baselines for monitoring.

Written Submission from LSE London (London School of Economics, ID485) on Matter M10 for consideration in the Examination in Public of the New London Plan, 2019

1. Introduction and Structure of the Submission

This submission addresses the first of two related Matters in which the Panel raise questions about whether, as the Plan proposes, the vast majority of London's development needs should be met within London, and (more specifically) through intensification of existing built-up areas there, or whether some of it should and could be better be achieved by accommodating some of the growth elsewhere in the Wider South East (M10) and/or through review of Green Belt within London (M11).

We have formally separated these, as required, though there is a common element to the two questions in terms of how far (and on what terms) the strategy of sustained intensification within London can actually meet London's projected development needs (section 2) in each .

This submission follows on from the one we have made under M1 about the treatment of alternative spatial strategies in the IIA (and by implication in development of the Plan itself), which was very critical of a one-eyed focus on 'sustainable intensification', and the failure to follow up on reports of the FALP Inspector and of the Outer London Commission indicating a need to look wider in order to address the serious (housing) delivery gap evident in the previous series of 'compact city'-based Plans. We try to avoid duplicating relevant material from that submission in the present one (by cross-referencing). Similarly, though a crucial issue for the first part of our submission these two Matters (M10 and M11) is how the 2017 SHLAA evidence on residential development *capacity* is to be understood in relation to this delivery gap, we defer detailed consideration of this question until our submission on M19 (housing supply and targets), referencing forwards where necessary to that (forthcoming) submission.

2. The Adequacy of Sustained Intensification as a Strategy for Delivering on London's Housing Needs

As is well known, the New Plan embodies 'capacity'-based estimates of future housing supply within London during the Plan period which are remarkably close to its estimates of future housing need, but very greatly in excess of what has been achieved over any period under past Plans. There is clear scope for debate about the bases on which the estimates of need (growth) have been made – both in relation to oscillating national projections of household growth and of how past backlog in meeting needs in London specifically should be met. For the purposes of this submission, however, these are of lesser importance than the consistently large gap evident through the Mayoral era between the additional supply that capacity-based measures promise and the much lower achieved levels of new dwelling completion or net additions to the housing stock. We shall discuss the numbers quite closely in our submission on M19, but for present purposes it is sufficient to note that (though net additions have been boosted very recently by exceptional levels of office conversions under PD) dwelling completions in London have fluctuated around 25 thousand p.a. since 2004, with no sign of a trend, which is vastly below the Plan/SHLAA 's capacity-based estimates of increases of 65 thousand p.a.- and also far short of any of the rival estimates of need growth. That is the delivery gap which has to be overcome if this Plan is to work any better than the earlier ones

And, despite a new name, heightened resolve and several sophistications made to the policy, the 'sustainable intensification strategy of this Plan embodies essentially the same ingredients as its 'compact city' predecessors. Whether we have evidence that the (genuinely) new features will actually make much difference will be considered in some detail in our submission on M19 – but the basic answer is 'not really' - which seems also to be message of the passage from the revised Housing Strategy cited in our M1 submission. The Plan itself seems remarkably uninterested in this fundamental question, focusing entirely on whether within standard NPPF conventions supply 'capacity' is in balance with predicted 'need' changes. That really seems a gross evasion of the real housing issues facing Londoners – but serves to suggest that the sustained intensification strategy is adequate on its own, without need to engage with questions about Green Belt or means of active collaboration with other WSE planning authorities.

In developing the Plan some serious attention should have been given to the delivery gap, and specifically to *why* neither:

- the successful build-up of a very large development pipeline during the course of London Plans (with an assessed potential for some 250 thousand potential dwellings) ; nor
- a massive intensification of residential development, with new site densities in London increasing by some 150% since 2000;

has secured substantial increases in the rate of housing completions.

A plausible basic answer is that with long term expectations of an increasingly tight land market across the tightly constrained WSE (as a whole), it makes little financial sense for large site owners to have them developed too fast. The argument in relation to densities is discussed in more depth, with evidence, in our submission under Matter M39, but the relevant fact is that with much higher permitted densities, developers/owners of large sites have been able to secure the same flow of housing (and thus cash flow) from release of a smaller amount of land, with a likelihood also that infrastructure and remediation requirements for other land within their 'capacity' can be advantageously deferred.

But whatever the full explanation, it is a mistake to assume that pushing *intensification* harder and for still higher densities will eventually produce the required rate of housing delivery. If targets are to be met (or approached) it is clear that the *extensive* dimension has to play a substantial part, in terms of opening up more sites beyond the margins of London's own built up area, within the London Green Belt and/or other parts of the Wider South East (WSE).

3. The Potential for Collaborative and Sustainable Development beyond London

The idea of London 'exporting' part of *its* population growth and housing requirements outside its borders is (and has long been) a highly contentious one – especially when consciously planned for in ways other than the creation of a limited number of self-contained New Towns, or negotiated Town Expansion schemes. The beginning of wisdom about this is to recognise that, as a matter of simple fact, there has been a large and continuing net outflow of migrants from London to surrounding areas in the Wider South East, for as long as we have records – and that (even in the post-war decades of planned population dispersal) the vast majority of this has occurred on an unplanned basis, through private decisions. The major role of planning has been to limit the *net* inflow into the Outer Metropolitan ring close to London (notably because of Green Belt restrictions), pushing population growth further out, to the margins of the Wider South East and other more rural areas

beyond. Displacement chains have greatly extended the Green Belt leap-frogging which Peter Hall saw (in 1973) as a perverse effect of containment policies for London. The driver for this process has chiefly been increasing space demands from a more affluent population (in urban areas throughout the region), and latterly from large scale international migration into London particularly. This has continued over the last 20 years, when more explicit constraints on greenfield development have meant that London has actually experienced higher construction rates than the rest of the region.

This sketch of the way that demographics, policy and housing markets interact here covers ground that successive London Plans have avoided making explicit, preferring simply to pretend that the city can deal (on its own) with the space demands generated by a dynamic central London economy, without imposing on its neighbours. One cost of this for the wider region have been a failure to deal coherently and sustainably with the combined opportunities and challenges presented by this dynamism (much of it now occurring in specialised centres well outside London – for example in relation to integrated planning of the extended growth corridors running in and out from London. The other important one – for the whole of this region - has been the impact on younger generations (in particular) and the less affluent (in general) from the continuing inflation of housing costs, driven by a real/recognised inelasticity of housing land supply across the Wider South East.

After these issues had started to be opened up in public as well as professional debate over the past 5 years (including in the FALP Inspector's and Outer London Commission reports) it is quite perverse for them to be buried again by the NLP's renewed complacency about London's ability to handle the pressures on its own – given further intensification *and* hoped-for new powers/finance from central government.

No London Plan on its own can provide a strategic solution for this, and there is (in our judgement) zero chance of any extended metropolitan planning authority or centrally imposed regional plan coming up with this. The answer has to be rest very largely on collaboration among willing partners in a context where incentives are directed toward and against this. Those issues are taken up in our submission on M16.

What the Plan can and should have done is to make a strategic contribution to that process by honest recognition of the likelihood of a repeated delivery gap in relation to London housing capacity/need, and push much further in spelling out how collaboration with sub-regional partners in relation to linked residential, employment and infrastructural development could yield benefits for all. Though building collaborative arrangements needs to be seen as a long term process it is one that should have been pushed substantially further during preparation of the NLP and in elaboration of its strategy. As far as residential development is concerned (as distinct from planning infrastructure priorities) the NLP effectively kicks this back into touch by its insistence that London can cope on its own. Or rather, that the possible collaboration on this issue is essentially a back-stop, to be pursued only if/when the sustainable intensification strategy has demonstrably failed. That is a mistake, wilfully made.

Without preparatory work of this kind it would be meaningless to try to quantify the potential for accommodating additional growth elsewhere in the Wider South East (or to assess how much of that very necessary additional development would be related to 'London' need as distinct from that arising elsewhere in the WSE. But it is certainly much larger than is likely to be achieved by a (desirable) strategic review of London Green Belt. For essentially the same reasons as cited in our M11 submission, a wider Metropolitan Green Belt review ought to be undertaken (with willing partners) as part of this wider planning – in order to produce a recognised long term situation in which a strong, 'greener' Green Belt with secure boundaries was guaranteed alongside an

expectation of sufficient elasticity in future land supply to undermine the incentive to speculative with-holding of existing sites, in London and elsewhere.

4. Conclusion

As we understand the situation, if this Plan proceeds in its present form a substantial element of the projected additional housing need in London will either be un-met (with poor households priced out of independent occupation) or met in a strategically unplanned way outside London, in less sustainable locations than could have been chosen for it. The Plan will simply fail in delivering what is expected of it – and the opportunity for a collaborative city-regional approach to planning for this region be unnecessarily deferred.

Written Submission from LSE London (London School of Economics, ID845) on Matter M11 for consideration in the Examination in Public of the New London Plan, 2019

1. Introduction and Structure of the Submission

This submission addresses the second of two related Matters in which the Panel raise questions about whether, as the Plan proposes, the vast majority of London's development needs should be met within London, and (more specifically) through intensification of existing built-up areas there, or whether some of it should and could be better be achieved by accommodating some of the growth elsewhere in the Wider South East (M10) and/or through review of Green Belt within London (M11).

We have formally separated these, as required, though there is a common element to the two questions in terms of how far (and on what terms) the strategy of sustained intensification within London can actually meet London's projected development needs (section 2 in each).

This submission follows on from the one we have made under M1 on the treatment of alternative spatial strategies in the IIA (and by implication in development of the Plan itself), which was very critical of a one-eyed focus on 'sustainable intensification', and the failure to follow up on reports of the FALP Inspector and of the Outer London Commission indicating a need to look wider in order to address the serious (housing) delivery gap evident in the previous series of 'compact city'-based Plans. We try to avoid duplicating relevant material from that submission in the present one (by cross-referencing). Similarly, though a crucial issue for the first part of our submission these two Matters (M10 and M11) is how the 2017 SHLAA evidence on residential development *capacity* is to be understood in relation to this delivery gap, we defer detailed consideration of this question until our submission on M19 (housing supply and targets), referencing forwards where necessary to that (forthcoming) submission.

2. The Adequacy of Sustained Intensification as a Strategy for Delivering on London's Housing Needs

As is well known, the New Plan embodies 'capacity'-based estimates of future housing supply within London during the Plan period which are remarkably close to its estimates of future housing need, but very greatly in excess of what has been achieved over any period under past Plans. There is clear scope for debate about the bases on which the estimates of need (growth) have been made – both in relation to oscillating national projections of household growth and of how past backlog in meeting needs in London specifically should be met. For the purposes of this submission, however, these are of lesser importance than the consistently large gap evident through the Mayoral era between the additional supply that capacity-based measures promise and the much lower achieved levels of new dwelling completion or net additions to the housing stock. We shall discuss the numbers quite closely in our submission on M19, but for present purposes it is sufficient to note that (though net additions have been boosted very recently by exceptional levels of office conversions under PD) dwelling completions in London have fluctuated around 25 thousand p.a. since 2004, with no sign of a trend, which is vastly below the Plan/SHLAA 's capacity-based estimates of increases of 65 thousand p.a.- and also far short of any of the rival estimates of need growth. That is the delivery gap which has to be overcome if this Plan is to work any better than the earlier ones

And, despite a new name, heightened resolve and several sophistications made to the policy, the 'sustainable intensification strategy of this Plan embodies essentially the same ingredients as its 'compact city' predecessors. Whether we have evidence that the (genuinely) new features will actually make much difference will be considered in some detail in our submission on M19 – but the basic answer is 'not really' - which seems also to be message of the passage from the revised Housing Strategy cited in our M1 submission. The Plan itself seems remarkably uninterested in this fundamental question, focusing entirely on whether within standard NPPF conventions supply 'capacity' is in balance with predicted 'need' changes. That really seems a gross evasion of the real housing issues facing Londoners – but serves to suggest that the sustained intensification strategy is adequate on its own, without need to engage with questions about Green Belt or means of active collaboration with other WSE planning authorities.

In developing the Plan some serious attention should have been given to the delivery gap, and specifically to *why* neither:

- the successful build-up of a very large development pipeline during the course of London Plans (with an assessed potential for some 250 thousand potential dwellings) ; nor
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has secured substantial increases in the rate of housing completions.

A plausible basic answer is that with long term expectations of an increasingly tight land market across the tightly constrained WSE (as a whole), it makes little financial sense for large site owners to have them developed too fast. The argument in relation to densities is discussed in more depth, with evidence, in our submission under Matter M39, but the relevant fact is that with much higher permitted densities, developers/owners of large sites have been able to secure the same flow of housing (and thus cash flow) from release of a smaller amount of land, with a likelihood also that infrastructure and remediation requirements for other land within their 'capacity' can be advantageously deferred.

But whatever the full explanation, it is a mistake to assume that pushing *intensification* harder and for still higher densities will eventually produce the required rate of housing delivery. If targets are to be met (or approached) it is clear that the *extensive* dimension has to play a substantial part, in terms of opening up more sites beyond the margins of London's own built up area, within the London Green Belt and/or other parts of the Wider South East (WSE).

3. The Acceptable Development Potential of Metropolitan Open Space and Green Belt land within London

As noted in our submission on the inadequate treatment of spatial alternatives within the IIA, no data are available from Plan work on how much additional land might realistically be released from Green Belt/MoSp status for residential development if that option were pursued. The GLA/IIA answer¹ to those (half dozen) critics of the draft IIA who sought a more active investigation of this question was that:

¹ Arup (2018) London Plan: Integrated Impact Assessment – post-consultation addendum report, GLA, July 2018, spatial option 4.1 [the word 'assessments' is omitted in 5 of the 6 repetitions of this response]. As with other aspects of the IIA there is an ambiguity about whose responses these actually are, but this one is evidently that of the GLA, relayed by the IIA team.

while the 'social and environmental appraisals are (recognised to be) inconclusive without borough-level Green Belt assessments, .. sustainable intensification is still considered to be the preferred option'.

With the two-part explanation that:

'The GLA does not possess the powers to amend Green Belt boundaries through the London Plan and Green Belt boundaries may only be designated at a borough-level. Additionally, the National Planning Policy Framework (NPPF) and Draft Revised NPPF (March 2018) outline the importance of Green Belt land and require all other reasonable options to be considered, including the use of brownfield and underutilised land and optimising the density of development'; and

'Sustainable intensification uses small sites, co-location, town centres, opportunity areas and publically owned land within London to meet London's development needs without Green Belt Release';

concluding that

'The preferred option does not prevent London boroughs from undertaking Green Belt assessments, but rather emphasises the GLA's preference towards intensification and long term Green Belt protection, in line with the NPPF'

Our assessment above (followed up in later submissions) makes it clear that the second part of this explanation is quite false – at least if 'to meet' means 'to meet completely', which would be the relevant assertion. It simply has not been shown that the sustainable intensification strategy will (more than half fully) meet London' residential development needs – only that if assessed capacity were built out at the rate which planners expect (against the experience of previous Plans) that those needs could be met.

The other part of the explanation is rather better grounded, in that the GLA clearly lacks the powers to amend Green Belt boundaries, and that the right to review rests with local planning authorities. This is common knowledge, and was very clearly understood by the Outer London Commission who (in their 7th report on accommodating growth) saw this selective release of London Green Belt land as a potentially important contributor to accommodating growth, which this Plan could provide a strategic contribution to.

Specifically – having drawn on careful advice from City Hall – the OLC argued that

'(while) a number of Green Belt reviews have already been undertaken within and around London (this has not been generally in a coordinated way. Given this ... there should be a comprehensive review of the London Green Belt to assess how it addresses national policy principles in the unique circumstances of the city and in terms of London's anticipated growth. It recognises that national policy makes such reviews a local matter and it therefore suggests that the London Plan should provide a strategic methodology/principles to coordinate such local reviews on a consistent basis. This could take into account 'London specific' factors such as Growth Corridors, the Plan's emphasis on land use/transport integration and its distinct approaches to housing density and environmental quality'.

It suggested that the Mayor might have powers to take a lead in concerting this activity, maybe on the basis of section 30 of the GLA Act, but that in any case the Plan could very appropriately propose criteria and a framework within which borough-based reviews could be undertaken.

The underlying case for some form of strategic review – as reported in the 21st Century Green Belt report which LSE London co-ordinated² - rests on three pillars:

- the inadequacy of intensification alone as a strategy for securing the desired/required level of housing completions within London;
- the fact that Green Belt and MOL account for almost a quarter of London's land area, with a substantial part of that being land of relatively poor environmental quality, lacking in public access and irrelevant to the separation of town from country; and
- the undesirability of purely opportunistic, ad hoc, piecemeal removal of sites, without attention to the coherence of the areas opened up in this way, safeguarding of core Green Belt areas, and maintenance of public confidence in the long term security and enhancement of a London Green Belt.

We note that the GLA 'preference' for intensification over selective use of Green Belt land is not buttressed by any substantial empirical evidence in the IIA or Plan, but as it says a matter of preference and a judgement about the balance of opinion among Londoners. The issue is too important to be addressed on this slender subjective and political basis, and without any regard for its strategic significance, e.g. in relation to the growth corridors which London Plans have consistently treated as a significant strategic element.

4. Relation to other Spatial Options

While strategically managed Green Belt release could make an important contribution to boosting housing delivery in London, it would not obviate the need to pursue intensification also. There is a neglected equity issue to be considered in the balance between the two as to who (and which social classes) get their local environment curtailed or protected under these two strategies.

And, in relation to the potential of collaboration on development sites outside London (including some in Green Belt, no doubt), a simple/understood fact is that leaders in the WSE expect leadership from the GLA in terms of a willingness to look closely at London's own Green Belt.

² A. Mace et al. *A 21st Century Metropolitan Green Belt*, report of a HEIF5 funded knowledge exchange project, LSE London, August 2016.

Written Submission from LSE London (London School of Economics, ID 845) on Matter M16 for consideration in the Examination in Public of the New London Plan, 2019

1. Introduction

Our submission on this Matter follows on logically from those on:

M1, which (severely) criticised the IIA assessment of alternative spatial strategies, both for failing to recognise the inadequacy of its/GLA's preferred internal 'intensification' option in meeting basic needs for the delivery of residential development, and for the extreme superficiality of its assessment of the potential contribution of development elsewhere in the Wider South East, treated purely as an alternative (rather than complement) to internal intensification); and on

M10, arguing for the need to pursue such external options seriously.

In this submission, rather than repeat these arguments as to need for the Plan to address 'the matter of development and growth in the wider South East', we focus on the Panel's question about 'how' this should have been done, and about the *need/adequacy of policies SD2 and SD3*, in relation to Plan implementation and/or informing a future review of the Plan?

We start by recognising the symbolic significance of the NLP's statement (para 2.2.1) that 'London is not an island' – contrasting with the (reverse) impression conveyed by all its predecessors - and with the space accorded to WSE and collaboration issues, including the two policies referred to. This does reflect a significantly increased level of engagement since the FALP between the GLA and authorities elsewhere in (what is now identified as) the Wider South East, and indeed between those authorities themselves (and the Eastern/South Eastern associations of them), expressed not only in regular meetings but collaborative action directed at central government, in respect of both housing policy and infrastructure investment priorities.

But almost all of the Plan does actually still implicitly treat London as an island, with scarcely any attention to the ways in which overlapping housing and labour markets (in particular) affect responses both to exogenous shocks and to planning policies. And the seriousness of engagement in relation to planning/development activities in no way measures up to the FALP Inspector's suggestion that a review of the London Plan include: *'engaging local planning authorities beyond the GLA's boundaries in discussions regarding the evolution of our capital city'*.

2. Policy SD2: Collaboration in the Wider South East

For the most part - at least the first three of its five sub-elements - this policy statement is quite anodyne, expressing a willingness to work together, exchange views, promote a consistent information base – and consider collaboration 'where mutual benefits can be achieved'.

There is one less transparent sub-element, involving the Mayor's support for 'recognition of long-term trends in migration in the development of local Plans outside London'. The significance of this is not elaborated on in the text, but seems to represent a reminder that – despite ideas about London accommodating all of its growth within its boundaries (2.3.1) – the long-term norm, involving a substantial net outflow of residents from London to other parts of the WSE, is not

actually expected to change during this in the Plan period. (This is slightly undercut later by the acknowledgement that (just) ‘some migration will continue’ (2.3.4). A pertinent question, with no suggested answer in the Plan, is whether, if London started to hit its new housing delivery targets these flows might be expected to diminish significantly.

The final sub-element is denser but also pretty opaque. It commits the Mayor to working with WSE partners to find solutions to a very wide range of potential strategic concerns. The only specific steer in relation to these, perhaps oddly, involves work on finding smart digital solutions to environmental issues. A linkage with addressing barriers to housing delivery is also implied, but this seems only to involve the possibility of monitoring impact/planning agreements, ‘for example related to urban design’.

3. Policy SD3: Growth Locations in the Wider South East

This policy statement is also more opaquely worded than those on issues within London. Part A suggests a willingness to work with WSE partners (and others) to ‘realise the potential of the wider city region’, though (perhaps diplomatically) this is related here only to investment in strategic infrastructure (to support housing/business development in growth locations, to secure mutual benefits, as well as meet needs). Part B also rather vaguely refers to the Mayor ‘supporting recognition of’ (the same phrase as for migration trends) ‘with links to London in local Plans’.

Much more substance is given to these unclear indications of willingness in the accompanying text, which reports Mayoral interest in:

- ‘working with willing partners beyond London to explore if there is potential to accommodate more growth in sustainable locations outside the capital, including possible new settlements in areas with good (rail) links to London 2.3.4 and 2.3.5;
- helping investigate and secure mutually beneficial infrastructure funding to unlock these opportunities - and (a bit more specifically) a statement that the Mayor *will* work with key willing partners (including the NIC) to explore strategic growth opportunities where strategic infrastructure can unlock development to support the wider city region (2.3.7); and
- supporting formal partnership agreements between authorities (including with some authorities/groups outside London where work is already being pursued), particularly to ensure a balance between public transport capacity and planned growth – which could conceivably include selectively supporting enhancements to capacity in growth areas.

These are all to be welcomed, and include appropriate signs of Mayoral willingness to take a lead – as the single agent in the WSE most able to commit resources/effort in ways that could make a difference – while not overstepping his role as just one of the potential WSE partners. It does, however, seem very odd that in this particular case (unlike others in the Plan) the apparent ‘meat’ to the policy proposal is entirely excluded from its formal statement of SD3 – and that there is nothing here which could be formally monitored, or the Mayor held accountable for.

The problem is that these positive statements about interest in (what amounts) city-regional strategic planning are at odds with the rejection (explicit in the IIA) of such an approach as an important part of planning for accommodation of the population growth projected for London. Within this section of the Plan there are repeated references to the Plan’s aim to accommodate all of London’s population growth within its boundaries (2.3.1) or the vast majority of it (2.3.4) and to London having the capacity and targets for additional homes to virtually match assessed need.

At this point, though, there is reference to barriers to housing delivery needing to be overcome (in London as in the WSE as a whole) and it being 'prudent to plan for longer term contingencies' – which is the context for Mayoral interest in working with partners on the lines referred to.

The trouble is that these are not 'longer term contingencies' at all – except in the sense that all planning is geared to expectations that will turn out to be somewhat inaccurate in one way or another. To repeat what we are having to say in a series of submissions under different Matters (in most detail when we come directly to the matter of the SHLAA's relation to housing delivery, in M19) on the available evidence the baseline assumption has to be that new/additional housing delivery in London will fall below estimated housing need growth, and targets, by a considerable margin, over (and through) the Plan period.

The Plan is in denial about this, but the pursuit of additional development possibilities elsewhere in the WSE, along lines discussed here (and previously at some length in the Outer London Commission report on Accommodating Growth¹) is not a matter of contingency planning, to be more urgently pursued if and when housing delivery in London remains at a disappointingly below-target level. It is the missing key element in the NLP – along with the more positive attitude to London Green Belt review that would signal London's *willingness* to partners elsewhere in the WSE.

4. Conclusion

The fundamental flaw in the NLP as a strategic document is its failure to recognise the inadequacy of sustainable intensification within London as the meeting residential development requirements, and to seriously investigate spatial options including *planned* growth areas outside London. The lines of intended Mayoral action set out in relation to SD3 in particular are welcome, positive and helpful but:

- too late, vague and contingent in how they are framed; and
- needing to be incorporated explicitly in the formal statements of policy, which appear deliberately opaque in their current form.

¹ Outer London Commission 7th report: *Accommodating London Growth*. March 2016 (London: GLA),

Written Submission from LSE London (London School of Economics) on Matter M17 for consideration in the Examination in Public of the New London Plan, 2019

M17: Housing Requirement

The core issues

This note confines itself to three main topics:

- The methodology used to generate an annual requirement of 66,000 homes
- A more fundamental criticism of such an approach; and
- The implications of such figures for households in the future – including the implications of taking into account the latest government figures.

Has the need for 66,000 additional homes per year been properly calculated?

Technically, the number has generally been calculated in line with guidance. The SHMA comes to a different and lower figure than that calculated by national government using the same basic data in part because it works on a much longer timescale than the London Plan and projections suggest that household formation rates will fall in the 2030s. The national figure of over 72,000 covered the period 2016-2026 – which is more in line with the needs of this exercise.

The methodology in the SHMA is desirable in that, unlike national figures it attempts to take some very limited account of the fact that lower housing output in the past few years has constrained household formation. This generates a housing need figure without backlog, vacancies etc of just over 55,000. However, there is no suggestion that simply taking account of these lower output figures fully reflects the impact that lack of supply has had on the capacity for London's population to form households. More importantly as discussed below it takes no account of the economic and other factors which have led to suppressed household formation rates at least since the financial crisis.

The final figure for the housing requirement estimate of 66,000 includes a reduction in backlog to be spread over 25 years. The backlog is based on existing households who are currently inadequately housed for one reason or another. It takes no account of constraints on household formation. It does however appear to include some households who, when re-housed, will leave a unit acceptable to another type of household so is potentially an overestimate. It would be more appropriate to split the backlog into those that clearly require an additional dwelling and those that while being rehoused leave a vacant, usable dwelling.

Clearing the backlog over a 25 year period is a policy decision – and a much longer time horizon than that included in earlier national estimates of housing requirements. Clearly assuming a different, shorter timescale would lead to a significantly greater requirement.

In addition, an estimate is made of the possible vacancy rate on new supply in line with observed vacancy rates. Again this is one possible estimate but does not reflect the factors that lead to vacancy and how these change.

What is clear is that these figures taken together almost certainly underestimate housing need and therefore housing requirements in London. As such the figure cannot be regarded as a technically based figure but includes a set of assumptions which could more readily be regarded as policy based – or at worst as close to circular in relation to capacity estimates.

More fundamental issues

The main element of the requirements estimate is the household projections for London – which are accepted subject only to a small adjustment for lower house building since 2011. However, projections are exactly what they say they are: projections which assume the future will be like the past. As such they build in the significant decline on household formation over the last decade which has been a function of the financial crisis and its aftermath; increasing regulatory constraints; and undersupply of housing not just in London but elsewhere in the country. But as or more importantly they also build in the economic environment of the past decade.

Household formation is impacted by a whole range of macro and employment related factors as well as conditions in the housing market including in particular affordability. Nationwide, over the period since 2008 maybe 1.5 million fewer households have formed than were expected to in 2008. The result is that future projections build in this past bad experience and assume that it will continue

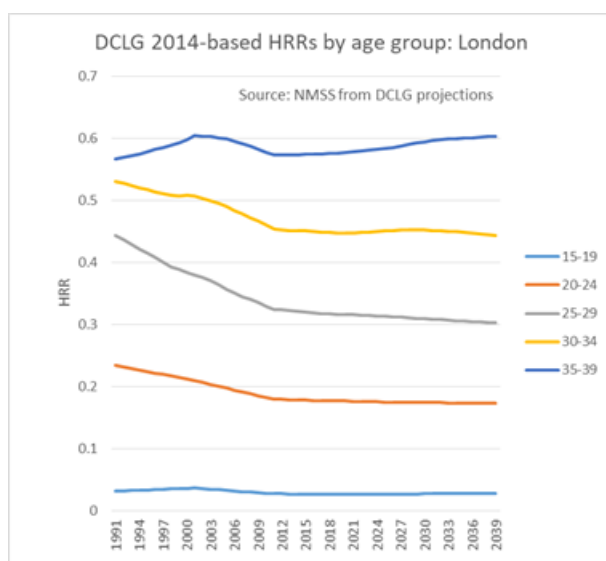
This raises two important issues:

- o What do these lower projections imply for housing conditions?
- o What happens if the economy grows more rapidly than assumed in the projections (or indeed if international migration declines)?

Implications of the tightening market

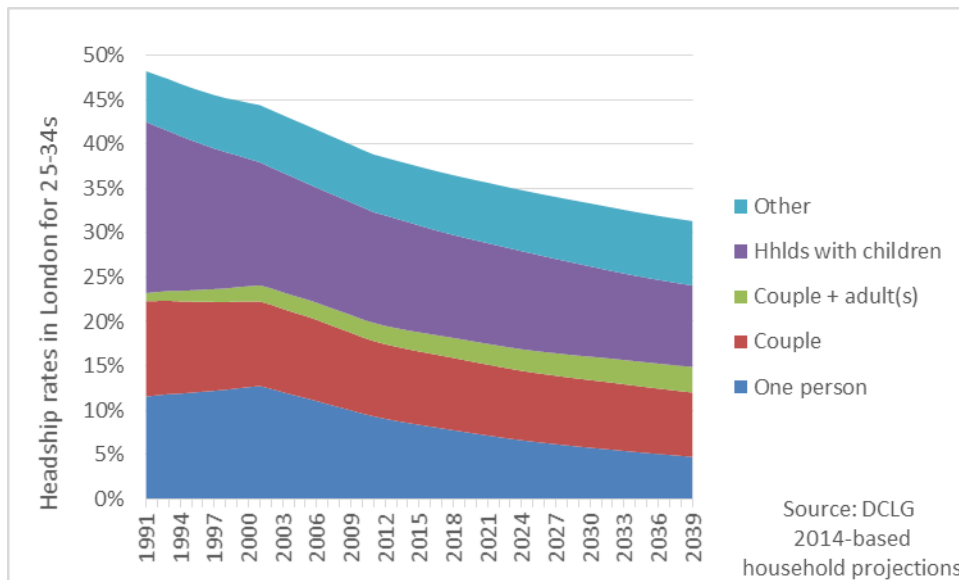
Housing conditions, in the sense of being able to form separate households, have been worsening for younger households for over two decades. And has significantly worsened since the turn of the century and is projected to continue to do so at least until the mid-2030s. Figure 1 taken from the DCLG 2014 based projections shows that headship rates have fallen significantly since 1991 for all those aged between 20 and 34 and that no improvement is expected to occur into the future.

Figure 1: headship rates among younger people in London



More detailed evidence (reflected in figure 2) shows that single adults are increasingly less likely to form separate households (tending to share in the private rented sector) and that the capacity to live as separate households among young couples has fallen very considerably and is expected to continue to fall throughout the projection period.

Figure 2: Past and projected changes in household mix in London: 25-34s



We thus have a situation in which the housing requirement is **planned** to lead to continuing declines in the capacity of younger households to live separately. It is very difficult to believe that this is meeting housing requirements.

What happens if economic growth improves?

If the economy grows more rapidly than it has over the last few years on which the projections are based, many of the households which have not been able to form can be expected to try to find a home of their own. Again is this what we want to reflect in housing requirements – especially as unless supply can adjust very quickly the effect will be that house prices will have to rise further to choke off that demand? The result however would be that, while growth would be good for the London economy it would come at the expense of an even more dysfunctional housing market – and further redistribution towards established households at the expense of new entrants.

Of course there are also other elements that could be expected to change as a result of economic and political circumstances. In particular, outward mobility from London after the financial crisis declined very significantly but has now come back to roughly traditional levels. The projections

reflect this cyclical behaviour. Into the future the extent of movement out of London is likely to depend on growing incomes, the demand for more housing space and the relative affordability of London as compared to the rest of the South East. The net effect on demand in London is also crucially affected by the attractiveness of the capital especially for younger people.

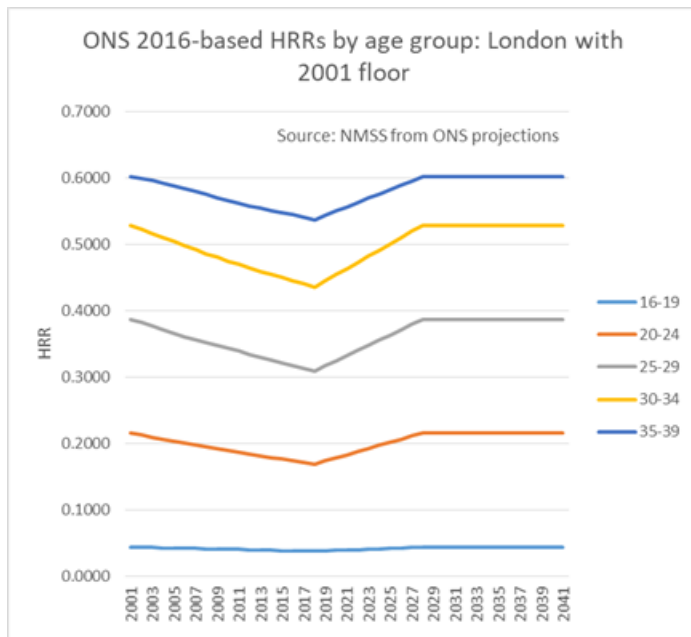
The biggest unknown is undoubtedly the impact of *Brexit*. If it is a no deal Brexit, affordability can be expected to increase and this could actually lead to more households wanting to form. More likely however is that the impact on wages and employment would offset this effect so the numbers of households forming declines. If there a good Brexit the most likely impact is on house prices as confidence returns and demand increases. This again could make it harder for new households to enter the market.

What we do know for sure is that none of these potential changes are directly included in projections. The logical approach would be to ensure that adjustments to requirements can be made in the light of changing circumstances. It would seem appropriate that this be included as a recommendation.

Implications for the future

The *2016 based household projections* produced by the ONS envisage falling headship rates for London up and including the 75-79 age group. The main reason for this is the results of recessionary effects on the 2011 census numbers. 2011 was perhaps almost the worst point for household formation after the crisis in 2008 and thus does not reflect longer term trends. Thus the shift to 2011 as the starting point for forward projections has led to a projected decline which cannot be reversed using the current methodology. That leads immediately to the conclusion that the projections are of little use in estimating housing need.

Figure 3: ONS 2016 based projections including a 2001 floor by (younger) age group



One way of visualising what has been inbuilt into the 2016 projections is to see what happens if we impose a 2001 floor – i.e. that no age group should be worse off in terms of household formation that it was in 2001, a reasonable expectation in a growing economy?

The 2016-based projections envisage that London will grow by an average of 35,000 households a year between 2018 and 2028. Applying the floor increases this to 74,000 if the adjustment is to take pace in the next ten years – as implied in figure 3 above. (Note the floor has been applied to each borough individually.)

The first implication is that as they stand there is no case for taking account of the new 2016 based projections as a means of estimating housing requirements. It would simply re-inforce the ‘planning for reduced standards’ which is already built into the projections.

Secondly were the principle to be accepted it would also clearly suggest that estimated requirements are significantly underestimated.

Thirdly it reinforces our argument that a projections based approach to estimating need excludes many of the most important determinants of housing need and requirements.

Conclusions

Thus to answer the questions specifically raised:

The approach mainly follows guidance but there are policy decisions within the calculation which mean that the figure could have been lower or higher – and much more likely higher if requirements are to be fully addressed;

There are fundamental flaws in the projections model which takes no account of causal factors. We would therefore argue that at the least there should be strong advice to re-evaluate the requirements figure regularly within the period of the Plan;

The impact of Brexit would come within this regular reappraisal – it is a one-off shock with consequence throughout the period which cannot reasonably be assessed at this time;

The 2016 based household projections are very significantly affected by conditions at the time of the census in 2011 and are inappropriate for the assessment of need and requirements into the future unless we wish to plan for continuing recession.

Written Submission from LSE London (London School of Economics) on Matter M18 for consideration in the Examination in Public of the New London Plan, 2019

Matter M18: Housing Strategy

This submission only addressed the question of build out rates in detail plus some general comments of GG4 overall.

The question posed is how the provisions in GG4E will be put into effect but the more fundamental question is whether, even if put into effect, will they make any real difference.

Build out rates

The set of policies suggested appear to be about good business planning within a constructive framework between the developer and the local authority.

The evidence that LSE London drew from GLA data covering the period to 2014 was that while around half of all planning permissions were on very large sites only around 5% of output had been on these sites. The build out rate on many of these sites has improved since 2014 but it remains a massive problem. Some of the issues are structural and can at best only be alleviated; some can be addressed by better business planning; and some are the outcome of the developers' business models. Not all of these problems can be addressed simply by making another plan which will almost certainly have to be modified because of external circumstances and indeed sometimes policy change.

The Letwin Review of Build Out Rates examined the potential for using this type of approach in a more formal way than currently undertaken by local authorities and developers. There was seen to be benefit from agreement about build out times but the potential for incentivising meeting agreed delivery times by imposing costs on the developer was seen to be limited by the range of unpredictable circumstances that might emerge, especially on a large site that might take a decade or more to complete. At the limit it could slow development down as disputes take time to resolve.

The rather different approach taken by the Letwin Review was basically to go with the grain of the developers' business model based on relatively slow build out rates to ensure that sales prices do not fall. The evidence on this model is that developers tend to build properties that will be priced somewhat above the existing units of similar type and that prices should if anything rise as the development is built out. It is not just developers that benefit from such an approach but also existing owner-occupiers and those who buy the new units who do not see falls in prices; and indeed the local authority in terms of public acceptance of development. This is a highly sub-optimal position and arises from the structure of the industry - but over time it probably generates more output. It also suggests that it is very important that there are far more planning permissions than appear to be necessary to achieve the stream of output desired by the Plan. (Evidence of 'excess' planning permissions is therefore positive rather than negative).

However, Letwin then examined what factors would increase build out rates and the answer was diversification into sub-markets and other provision which would be able to absorb development more effectively— i.e. a wider range of products (in terms of sizes, types, quality, location etc.) and outlets for market housing; more Build to Rent; more affordable housing; more custom build and more of any other type of dwelling where there was basically a contractual rather than a speculative building model involved. The wider the mix of providers and the wider the range of sub-markets included, the speedier and more desirable the outcome.

Observation of existing sites also suggested that there were many 'unique' features of each large sites which generated considerable uncertainty – so demand was by no means the only reason for slow build out rates on large sites. Other agencies and their incapacity and lack of preparedness to address required infrastructure issues – notably with respect roads, water and sewerage were often the reasons for significant hold ups and extra costs – even after the development had started. These issues need to be addressed before one can expect to see large phased developments build out significantly more quickly.

The answer therefore to the question whether policy GG4E can be implemented and achieve its goals is that improvements can undoubtedly be made. However, they are very unlikely to be enough to make a significant difference. Developers, once the site is on the books, do not generally have an incentive to do anything other than complete as soon as possible except with respect to the absorption rate. Bringing more developers on to large sites, eg by sub-dividing sites at the outline planning permission stage as well as encouraging a wider range of dwelling types and tenures could almost certainly improve build out rates and help to provide for different needs. However, this will impact not just on land values but also on risks and potentially profitability. In particular, it will not be enough to make a major difference if infrastructure and other constraints cannot be overcome in a timely manner.

General comment on delivery

More generally, policy GG4 reads more like a set of aspirations rather than a set of planned actions. These aspirations are mainly entirely appropriate. However as stated they are almost certainly inconsistent with one another in that for instance GG4B may reduce the numbers of sites coming forward and thus negatively impact on GG4A. The fundamental issue is that while the GLA can provide a framework they inherently do not have the tools to deliver such a large step change. This is reflected in the proper statement that Those involved in planning and development must address these issues.

Written Submission from LSE London (London School of Economics) on Matter M19 for consideration in the Examination in Public of the New London Plan, 2019

Matter M19: Housing Supply and Targets

Introduction

This Matter is almost all about two issues: are the SHLAA numbers of capacity justified and whether the numbers of dwellings identified through this capacity assessment can actually be delivered. Our response concentrates on these two questions as they are central to the London Plan's credibility.

The SHLAA numbers

We note positively that the SHLAA (GLA, 2017b) does provide persuasive evidence that the chosen strategy is capable of supporting a housing supply *capacity* (for the first decade of the Plan's operation) very close to the SHMA's calculation of objectively assessed need (GLA, 2017c). However, although compliant with relevant NPPF methodologies, objectively assessed capacity is simply not the same thing as (objectively forecast) delivery of extra housing units – either in principle or (as past experience in London indicates) in practice.

We note that the capacity estimates prepared for this Plan *are* substantially higher than those derived in the (generally comparable) 2013 SHLAA. For large sites, the overall increase seems to be 47%, although the majority of this part (27%) relates to underestimation in the 2013 SHLAA of likely densities of development. Changes have been made in the density assumptions applied to such sites between (in the earlier round) estimates in the middle of the relevant density ranges prescribed in the Plan's density (or SRQ) matrix to (in the current round) ones reflecting those arising in practice in planning approval cases (at the maximum values prescribed in the Plan, with a mark-up in Opportunity Areas etc.). We welcome this shift to greater realism (consistent with recommendations in a density research study for the London Plan Team (LSE, 2016¹) expected to have broadly this scale of effect). But, we note that, since it was based on past practice, it does not imply actual increases in densities as compared with the past, at either approval or delivery stage. As such of course it raises capacity estimates without implying any effect on the scale or rate of delivery.

Finally, with respect to large sites, it is important to note that the higher capacity estimates are not grounded in any projected impacts from policy changes (in the Plan or the Housing Strategy – or even national policy).

For small sites, however, where the basis of estimation is statistical, rather than from identified plots, a very much larger proportionate increase in capacity is explicitly based on implementation of the Plan's small sites policy, particularly in relation to infill and conversions. It is thus policy based. We welcome these policies, which could at least in principle have real and significant impact on housing delivery as well as capacity. But we are very much more cautious about possible outcomes than is the Plan because there is considerable evidence that there are more fundamental reasons for the lack of smaller sites coming forward. The two main reasons are the continuing costs and risks associated with gaining planning permission for small sites despite the introduction of Planning in Principle (Magalhaes et al, 2018)² and the continuous decline in the numbers of smaller builders. In the absence of evidence, the assumption that a quintupling of output from such sites could be achieved (from 3.7k p.a. average over the last 8 years to 18.7 p.a.) over the first decade of the Plan appears wholly incredible. At the very least the impact of these policies needs careful and transparent monitoring.

¹ And an unpublished follow-up study in relation to the SHLAA.

² Magalhaes et al (2018), Planning Risk and Development, London: RTPi

The (strongly) implied treatment of capacity estimates for the next decade as indicative of the likely 'scale of development' and delivery of additional housing within London, under the sustainable intensification model, suggests that we could expect to see an increase of some 150% in housing completions. Of this the small sites (where capacity and delivery are quite closely related) are expected to contribute 15k, on the basis of the Plan's specific policies for small sites. We note that there is a very significant difference between capacity and planning permission before achieving delivery).

The balance (an additional dwellings 25k p.a.) must come from large sites, involving an increase of about 160%. Very little of that (maybe 20%) might be expected as a consequence of the higher capacity estimates³. Policies in the Plan and Housing Strategy which are designed to enhance delivery rates might well have some positive effects, but the basis of the estimates lies not in any allowance for this, but an unrealistic interpretation of delivery rates as equalling the capacity judged to be available.

Overall while the capacity may be there is little reason to believe that all of this capacity can be turned into planning permissions let alone into delivery over the ten year period.

The main counter-argument lies in the potential importance of permitted development, a national policy which is currently resulting in large numbers of dwellings based outside the individual planning permission structure and which the Mayor deplors. Into the future the existing government is likely to extend opportunities under this policy but no estimates or evidence can really be offered of the scale of the possible permitted development might be expected over a ten-year period. As the whole policy lies outside the scope of the Plan any such development must be regarded as a windfall that is positive in terms of numbers but has many negative impacts.

Capacity versus Delivery: targets

We start by taking the SHLAA figure for the period 2019-29 which generate annual average output required:

- From large sites 40.5k p.a.
- From small sites at 24.6

The former is clearly not a delivery forecast without massive policy changes and draconian powers. And even if there were a step change it will certainly not occur over the next two or three years – adding to the pressures for more output in later years.

The latter is, however, meant to be delivered through policy change – as compared with a windfall - 8 year trend baseline of 5.9k p.a. This implies an additional 18.6 k p.a, for policy effects (an increase of 310%). Even if feasible it is utterly incredible that it could be achieved instantly. If it were actually achieved in 2029 with linear growth between (which is highly unlikely) that would knock 9.3% off the average for the decade.

³ Between zero and 33% depending on the accuracy of our guesstimate about the part of the increase in capacity estimates between the 2013 and 2017 SHLAAs that simply reflects greater realism in relation to the operational (rather than formal) density norms.

But even if the large site completion rate were to go up by 20%, which reflects the projected increase in capacity that would only add something around 3,000 additional units per annum to total London deliveries. This again would not be immediate.

Borough level targets

The borough level targets, which are based on these capacity estimates (although given the small site assessment is statistical it is not fully clear how this element is calculated) are entirely unrelated to evidence of delivery within each borough. The result is an extremely odd looking pattern which at one extreme asks a borough (Tower Hamlets) to do less than they are currently delivering, while at the other end of the scale the target is more than 300% of current delivery levels. Table 1 gives details of the top 8 boroughs in terms of the scale of the target set in table 4.1 of the Plan and compares it to 2016/17 output levels (which are generally higher than 2017/18 numbers).

	Plan Annual Target	2016/17 net additions	% increase required
Barnet	3,134	1,799	74%
Brent	2,915	1,364	214%
Croydon	2,949	2,835	4%
Ealing	2,807	845	332%
Greenwich	3,204	2,380	35%
Newham	3,850	2,377	62%
Southwark	2,554	2,482	6 %
Tower Hamlets	3,511	4,827	27%
Top 8	38% of total	47% of total	
London	64,935	39,560	64%

Of course, the 2016/17 numbers are simply one year and there may be reasons specific to that year why figures are particularly low or high. However, the range of differences suggests that there will be very different challenges between boroughs. Moreover, given the Plan is ultimately about delivery surely some note should be taken of what has proved possible as opposed to a simple capacity measure.

What is also important in this context is that these boroughs accounted for almost half of London's net new additions in 2016/17 yet are expected to achieve only 38% of the Plan's requirements. This suggests that the challenges among the other boroughs will generally be greater.

A rather different issue is the size of dwellings specified in the Plan (Table 4.3) with over 50% of dwellings assumed to be one-bed. This is highly unlikely to be acceptable in the market. Moreover there is little reality to an assumption that only 35% of new build units should be a market prices/rents. In practice requiring over 50% of new dwellings be affordable is likely significantly to slow delivery

Conclusions

There are thus a number of major concerns about both the approach and the potential outcome:

Large sites are notoriously slow to deliver and it is difficult to see that the powers that the GLA have can make a significant difference in the short run against a declining market. Some of the suggestions in the Letwin report and elsewhere in the national policy debate may help to improve

delivery into the medium term – notably breaking up sites and diversifying outputs at site level (see M18).

Small sites, and small builders, still face high costs and risks in putting forward for planning permission and can probably work elsewhere in the South East and on existing dwellings more easily than expanding output in response to relatively limited policy change. The statistical analysis by definition does not address issues around specific sites and there will undoubtedly be site and area specific problems which are in no way part of the analysis.

Thus even if one accepts that the capacity is here – remembering that it is a very much bigger figure than in earlier Plans and so implies both policy success and a massive step change from past allocations - delivery from both big and small sites is likely to continue to fall well below that implied by capacity estimates and hence also below objectively assessed need. One implication is that housing targets for various areas within London may be quite unrealistic in relation to what boroughs can achieve simply on the basis of a more accommodating attitude to residential development/densities. Other policies, both national and local, are required – and even if they were forthcoming, the positive results would not mainly be seen during the term of this Plan.

Answering the questions

- a) They are better numbers than in the past but, especially in relation to small sites they may well be unrealistic;
- b) These issues were not taken account of in the calculations;
- c) it is highly unlikely that the sources identified will be sufficient to meet the targets at either GLA or borough level;
- d) would be easier if it were possible to encourage GB swaps;
- e) yes this is a sensible approach to improving the use of well -connected sites but see answer to (d);
- f) not at all;
- g) There are inadequate levers available to bring about the step change required; it is totally unrealistic to expect results by 2019 – indeed it may well be unrealistic to expect them in the next 5 years;
- h) As the targets are themselves unrealistic it is not sensible to sad a greater level of lack of realism. There is inherently no analysis of market behaviour in the Plan so the tools are anyway not there;
- i) Do not think extending the time helps – should make the Plan more realistic for the immediate and medium term future;
- j) this is a minor issue given the lack of realism with respect to the 64,935. However, interaction with the wider south east more generally is to be applauded;
- k) no –but it is too far away to matter – should be part of the reviews which will take place during the term of the Plan;
- l) Very significant especially given they have no rights formally to determine their own targets.

**Written Submission from LSE London (London School of Economics, ID 845)
for consideration in the Examination in Public of the New London Plan, 2019**

Matter M24: Affordable housing

General remarks

The London SHMA has found that 65% of London's need is for affordable housing, and the Mayor's strategic target is for 50% of new homes to be 'genuinely affordable'. This is a strikingly ambitious target, especially given the Plan's emphasis on low-cost rented homes (social rent/London Affordable Rent), which require the highest levels of subsidy.

There is no doubt that there is very high unmet demand for lower-cost housing in London, especially if we accept the assumptions of the Plan (some of which are implicit):

- that those who now live in the capital should be able to find housing in the areas where they currently live, regardless of their income or other circumstances;
- that lower-cost housing should be available across the city;
- that almost all new housing should be mixed in terms of income, unit size and tenure and that this mix should be at the level of individual buildings or schemes; and
- that lower-cost units should be indistinguishable (at least externally) from market units.

All of these are legitimate political goals that reflect the lessons of historic failures of urban planning and governance; some are dictated by national planning policy. However, they are all choices that increase the challenge and sometimes the cost of providing affordable housing, and raise issues around who pays.

The responses below address certain sub-questions of Matter 24. The questions ask about the effects of specific, individual affordable housing policies, and we have responded by addressing the expected effects of each policy in isolation. As the Plan and the Mayor's Housing Strategy make clear, policies H5-H8 are part of a wider suite of policy measures including grant funding and intervention in the land market, so they will not in fact operate alone. We make a few comments about how certain policies can be expected to interact, but it is for the panel to consider how all the measures will work together.

Questions re Policy H5 (Delivering Affordable Housing)

b) Would the strategic target of 50% of all new homes to be genuinely affordable be justified in light of the identified need?

Judged purely against need and without regard to deliverability, or indeed alternative approaches to subsidy, the 50% target looks reasonable and indeed is not high enough. The Plan itself makes this clear: even if the capacity numbers were to be achieved in practice (which, as we say in other submissions, is extremely unlikely), and the strategic target were to be met immediately, this would imply production of 33,000 affordable units/year (50% of 66,000). But the SHMA identifies a need for 43,500 affordable units per annum, so even on these highly unrealistic assumptions the policy, in

isolation, would leave a shortfall of 10,500 units per annum. Actual numbers of new affordable homes are likely to be much lower, so the true gap will be greater.

c) In requiring major developments which trigger affordable housing requirements to provide affordable housing through the threshold approach, would the policy be effective in delivering the quantum of affordable housing required?

No, not on its own. The Plan's affordable-housing policies set the strategic framework for boroughs' use of S106, through which they can require developers to provide a proportion of affordable housing as a condition of receiving planning permission. This mechanism has in recent years become the main channel for provision of new affordable homes. S106 is in effect a hypothecated tax on development.

Compared to its predecessor, the draft Plan increases the proportion of affordable housing expected through S106 by introducing a threshold significantly higher than the average previously achieved—and higher still for developments by housing associations and/or on public land. It also provides new guidance about how the total amount of affordable housing should be distributed, requiring that each scheme produce at least 30% at social or near-social rents (the highest subsidy level).

To meet the requirements developers would have to generate higher profits to cross-subsidise the affordable housing or pay less for the land. Evidence is already available that there is land that is not coming through into development, some because it was bought before the target was introduced and some because landowners now see less benefit in selling. The policy's eventual effect on the quantum of new affordable housing would depend on how responsive landowners, developers and consumers are to changes in costs and prices.

Realistically, the policy on its own would be unlikely to result in a significant increase in the overall *number* of affordable units, and could indeed cause the number to fall. The adoption of higher affordable-housing expectations through the threshold approach might however increase the *proportion* of affordable homes produced (although not up to the 50% level).

d) Would the approach to affordable housing providers, public sector land and industrial land be justified and effective?

The discussion below relates to public-sector and industrial land. We express no view as to whether the approach is justified, as this is a political decision. We assume that the definition of an 'effective' policy is one that would lead to up to half of new housing on (former) public land being affordable. Thus by definition an effective policy must be expected to lead to higher overall production of housing on (former) public land. The policy might be effective in the first sense but in our view is highly unlikely to be effective in the second, as it will reduce the financial incentive for public landowners to release land for development.

The Plan's justification for the 50% target is that 'as public assets, these landholdings should be used to deliver development and outcomes that are most needed by—and matter most to—the public.' The Plan performs an important signalling function, conveying the Mayor's strong view that public

landowners, whatever their functions, bear some responsibility for alleviating London's housing problems.

The range of public-sector bodies with landholdings is broad—from schools and prisons to NHS trusts and the Ministry of Defence. Most have core missions that do not involve housing. Landholdings not required for operational purposes are assets that might be sold or leased. When public bodies sell land, their goal (and normally legal responsibility) is often to secure the maximum price for it, to provide funding for their core activities. The ongoing squeeze on public-sector finance has increased the incentive for public landowners to maximise receipts from asset sales.

The 50% threshold for affordable housing on public land can be expected to reduce the capital value of public holdings of developable land in London. This is intentional and is what is meant by 'embedding' the threshold numbers into land values. How public landowners will respond to this change in incentives, and to the Plan's political message, will depend on their expectations about how long the policy will last and how rigorously it will be enforced, and on their own strategic goals. Many of these institutions do not routinely audit their landholdings so by default would not consider selling it for development (or developing it themselves). Some institutions regard their land as a strategic asset and source of future revenue. Landowners that aim to secure the highest price for their land may decide to hold it off the market in the hope that policy will be relaxed in future. The Plan seems implicitly to assume that the 50% affordable policy will not affect the rate at which public land is made available for development. The Mayor can direct his own organisations to make land available for housing and has done so for example with TfL, which has had to accept the tradeoffs involved. However most public landowners are not under the Mayor's control.

As for industrial land, the 50% threshold reduces the incentive to move industrial land to a higher-valued use. This may be in line with the Mayor's overall strategy but clearly has not been assessed in cost-benefit terms. The requirement is likely to reduce the land made available for housing.

Questions re Policy H6 (Threshold Approach to Applications)

a) Would the threshold approach to viability, with a fast track route and viability tested route, as set out in policy H6, be justified and effective? Would the threshold level of affordable housing as set out in Policy H6B be justified and effective?

One of the main goals of the threshold approach is to increase certainty/reduce risk, with the hope that this will speed up the process of agreeing planning permission and accelerate overall development. Our research into the barriers to faster housing delivery in London have identified protracted planning negotiations and complex requirements for developer contributions as a significant issue, especially for large schemes. This policy introduces greater clarity, both about the overall level of developer contributions to affordable housing and about the split within the overall total. This greater certainty is to be welcomed, subject to the concerns raised above.

The question of whether these targets are set at the correct level is not straightforward. They clearly would not produce the required amount of affordable homes even if the overall total of 66,000 were achieved. On the other hand, higher targets increase the chances that land will be held back, as

discussed above. In our discussions with key stakeholders before the target was introduced, they said that a target of thirty percent was more likely to enable the required total to be achieved.

One issue that has not been much discussed is how the emphasis on small sites might affect the capacity to achieve target levels. Small sites generally produce a lower proportion of affordable homes than do medium to larger sites for a whole range of viability reasons. The expectation for greatly increased production on small sites is a further reason why we might expect the outturn of affordable units to be lower than implied in the Plan.

Finally, changes in national policy on CIL and S106, as well as Mayoral CIL, all put more pressure on the residual available through S106 for affordable housing. Policy makers are looking to fund more infrastructure through CIL; this almost inherently will reduce the amount available to cross subsidise affordable housing. Overall therefore the likelihood is that it will become harder to achieve the target proportions identified in the NLP.

Questions re Policy H7 (Affordable Housing Tenure)

a) Would Policy H7 be effective in delivering the tenure of affordable housing to meet the objectives of Policy GG4?

c) Would the preferred affordable housing tenures be justified and effective in meeting identified need?

This is another area where the many objectives with respect to delivery of affordable housing are likely to be inconsistent with one another. The provision of social rented housing requires far higher levels of subsidy than either affordable rents of other types or affordable home ownership, which can often be provided without subsidy additional to S106. If the proportion of social housing is to be increased then the numbers achievable purely through S106 are likely to be lower.

This is reflected in research done by the University of Liverpool for MHCLG¹, which shows that while over 30% of the financial value of S106 affordable housing agreements was in London, this only generated around 17% of the total numbers of affordable housing provided across the country. In S106 contribution terms, one London affordable home on average cost around 80% more than the average for the country as a whole – showing that London affordable housing is very expensive to provide, especially at social rents. It is therefore likely that the emphasis on social rented housing, however much it is justified in need terms, will actually reduce the total quantity of housing made available over the period of the NLP.

¹ Lord, A., Dunning, R., Dockerill, B., Carro, A., Burgess, G., Crook, A., Watkins, C., & Whitehead, C.M.E (2017) *The incidence, value and delivery of planning obligations in England in 2016-17*, London: Department of Communities & Local Government

Questions re Policy H8 (Monitoring Affordable Housing)

- a) *Would Policy H8 provide an effective framework for boroughs to monitor affordable housing?*

Here we raise only one issue. If the measure of affordable homes targets is to be in terms of habitable rooms for reasons to do with mix of dwelling types etc, then it seems to us (and we may be missing something?) that it will be extremely difficult to transpose this into units, as required for determining whether the policy has led to production of the numbers of affordable homes identified in the needs assessment.

Written Submission from LSE London (London School of Economics, ID845) on Matter 39 for consideration in the Examination in Public of the New London Plan, 2019

1. Introduction

We did not ask to participate directly in discussion of this Matter – about the formulation and implementation of policies to assure the ‘optimum density’ of residential developments in particular contexts within London – because we are generally supportive of the direction of change introduced by the NLP, and do not have the relevant expertise to evaluate the ways in which that is supposed to be implemented locally.

We are aware, however, of objections made by others to the direction of change – specifically the removal from this Plan of the density/Sustainable Residential Quality matrix used in its predecessors – and wish to rebut these. In doing so we have an interest - as authors of two of the Density Research reports commissioned by the Plan team, one of which recommended removal of the matrix, or at least of the explicit setting of maximum density levels for each of a number of types of area within London. We therefore wish to ensure that the relevant evidence is taken fully into account.

Because the clearest (and simplest) part of the proposed changes embodied in the draft NLP’s Optimum Density Policy (D6) is the removal of the old matrix, the remainder of our submission starts with the second of the Panel’s questions, about whether ‘leaving density to be assessed on a site-by-site basis’ will be as effective as using the matrix’. We then turn (briefly) to the its first question, about the proposed ways in which that site-by-site assessment should now be carried out.

2. The Likely Effect of Removing the Density Matrix for Achievement of Optimum Densities of Development

A starting observation is that the notion of achieving optimum densities is a slightly odd one, in two respects:

- why refer to a search for optima in just this aspect of the Plan? and
- why focus specifically on the optimum density of development, when this provides only one partial indicator of the form that a specific scheme should take to achieve overall objectives.

The reasons for this particular language and focus reflect some very important tensions and problems in this aspect of London Plans. All of the Mayoral Plans (including this one) have embodied ‘a compact city’ strategy, involving London accommodating a substantial projected growth in population within its borders, without recourse to Green Belt/MoS land, or to planned development elsewhere in the WSE. This is justified largely in environmental terms, including potential avoidance of increased carbon emissions from car-borne personal travel, as well as savings of greenfield land.

The language was thus initially (in the 2004 Plan) one of *maximising* densities, toned down to one of ‘optimising’ densities in the face of objections of various kinds. The seemingly technical notion of optimisation never actually had an analytic basis – and still does not have such a basis. It simply reflects a compromise between competing considerations, of which the only ones to be at all formalised were those relating to levels of access to the city’s public transport network (measured in PTALs)

The old/iconic London Plan density matrix rather crudely divided up neighbourhoods in London into a few categories on the basis of two three-way categorisations of areas, relating to:

- high/medium/low levels of public transport access (PTAL values); and
- central/urban/suburban character, in terms particularly of proximity to larger/smaller service centres.

In principle this gave 9 categories of areas, though most fell within a smaller sub-set, since central areas won't normally have low PTAL values nor suburban ones very high ones. For each of these very broad types of area, an acceptable range of residential densities was defined (with maximum and minimum values). These ranges were naturally very broad, because of the diverse sets of areas to which they were to be applied and now to the use of dwellings rather than habitable rooms.

The basis for the ranges as originally defined was not an analysis of the impacts and acceptability of real schemes which had been proposed, but rather a small number of outline designs for types of acceptable neighbourhood intensification. Hence the fact that a development involving an average plot density falling within the matrix limits (for the relevant broad type of area) provided no assurance that its form (including height, block grouping etc.) would actually be suitable for the setting – or for desired mixes of dwelling type and size.

One important point to be understood, in considering whether the NLP's new optimum density policy proposal is 'as effective as using the matrix' is that even *by design* there is little reason for thinking the matrix (as deployed in the past) would be (or has been) effective in relation to policy D6's concern with relating 'built form and massing' to 'the surrounding context ... of a development'

A second equally important question to be asked about the density matrix as a *policy instrument* is whether there is evidence that in practice it has been *effective* - either at the aggregate level across London, or differentially across areas within London - in managing the density of new developments in accordance with Plan policies.

On the basis of our analyses for the LPT¹, there is very little to indicate that it has been effective (or even consistently applied) in these respects. More specifically:

- while average densities of new developments within London have risen very considerably over those prior to 2000, the increase seems to have been concentrated in the early 2000s – prior to the first Mayoral London Plan (in 2004) – with no clear evidence of an upward trend since then. We understand this pattern of change as one reflecting a strong *market response* to the tightening of land supply across the Wider South East as a whole *via (national) greenfield quota policies, rather than London-specific planning policies*;
- as noted in our submission for M19, the effect of this general intensification (whatever its causes) seems to have resulted far more in using less land with only a very modest boost to rates of housing delivery;
- at a local level within London, there is an evident correlation between achieved densities of new development and the norms set in the density matrix. But analysis indicates that this overwhelmingly reflects a, strong, response of market forces (interacting with local planners)

¹ I.R. Gordon, A. Mace and C.M.E. Whitehead (2016) *Defining, Measuring and Implementing Density Standards in London*, London Plan Density Research Project 1, Greater London Authority [in EiP Library]. (https://www.london.gov.uk/sites/default/files/project_1_defining_measuring_and_implementing_density_standards_in_london.pdf)

rather than the matrix itself. The evidence for this is that achieved densities are much more closely related to alternative measures of character and accessibility than to those used to define the matrix (e.g. a more continuous version of TfL's public transport accessibility index, the established local population densities, and character measures for differently scaled areas), while the policy variables which had a substantial impact were Opportunity / Intensification Area statuses (again not the matrix); and

- from the matrix's first appearance in a London Plan onwards, its limits have consistently been more honoured in the breach than in the observance. From the outset, the performance standard has been supposed to involve 95% of approved developments having planned densities within the relevant matrix range. In fact, as has been regularly reported the bulk of development has involved schemes falling outside these limits, with half or more generally above the relevant upper limit.

The last of these observations in particular leads is to conclude that the GLA - with strategic policy concerns for London as a whole is an unlikely guarantor of more local environmental/quality of life considerations which the matrix's upper limits are supposed to protect..

Much better we would argue to find ways of entrusting these to boroughs, in the context of some more generalised norm as to (say) the average densities expected, given the GLA's city-wide concerns.

With removal of the density matrix, the NLP's policy D6 might represent a significant shift in that direction, depending on how the policy will actually be implemented, and the Panel's first question about that, to which we now (much more briefly) turn.

3. Questions about the Likely Effect of the Alternative Density Policy Instruments Proposed by the NLP

We do not claim the technical expertise necessary to be sure what the implications are of the rather lengthy and somewhat opaque presentation of the new policy instruments.

We do, however, note two aspects of the proposals which seem to have different implications for the capacity of boroughs to make situated and locally-informed judgements about the impacts and thus suitability of more or less intensive development proposals:

- on the one hand, the language of 'optimising' densities is repeatedly used in a sense which clearly means pushing densities up, while specifying factors – including future rather than current infrastructure availability/capacity – that are to be used for this purpose; but
- on the other hand, broadening the required set of density measures to be supplied, explicitly addressing issues about built form as needing closer scrutiny in denser schemes, with more use of master planning for large scale development. This all suggests more scope for qualitative factors to be taken into consideration –with an apparent expectation that this will make higher densities more acceptable.

The new instruments proposed are undoubtedly more cumbersome and more expensive to operate than the status quo. It is not clear, however, that the new procedures will actually return more responsibility (as well as influence) to boroughs in relation to making judgements about suitability of different examples of intensification – as would (in our view) be the desirable objective. Rather they seem to imply a very considerable degree of GLA control (beyond what we would regard as its proper role of establishing principles).

4. Conclusion

Intensification is a common-sense strategy for a city like London with (for the past two decades at least) a strongly growing population and limited space within its borders.

The density matrix was one rather simple way of trying to pursue that, by specifying a range of acceptable densities for different spatial contexts within London. Analysis of outcomes strongly suggests that the matrix played little role in determining either the time path or spatial pattern of approved residential densities – which were shaped more by a combination of market forces and national policy constraints affecting land supply across the WSE as a whole.

This is a very poor record for a planning policy instrument, which clearly failed to resolve the tension within London government between a desire to drive densities up across the city, and local concerns over perceived negative impacts on the quality of community life. The new instruments set out in D6 give more recognition to such concerns, but do not seem at all to resolve the tension, or recognise that boroughs are the appropriate judges of the qualitative issues.

Written Submission from LSE London (London School of Economics, ID 845) on Matter M65 for consideration in the EiP of the New London Plan, 2019

1. Introduction

Our response to M65, and argument with the New London Plan (NLP) policy G2, follows on from broader points raised in relation to the Plan's general spatial strategy (our submission in M11) with its avoidance of any use of sites within the existing London Green Belt (LGB) to help meet housing delivery targets. As we noted, the NLP position on green belt essentially rests on:

‘a matter of preference, and a judgement about the balance of opinion among Londoners’.

In essence the position of the NLP reflects value judgements that give particular weight to the maintenance of the existing green belt (and potential expansion of it) *relative to other priorities* – notably those of addressing unmet housing need, but also protection of open space used by local communities elsewhere in London.

Here, on the Matter explicitly concerned with policies toward Green Belt, rather than ones that simply excluded real consideration of its potential role in strategic options, we focus on the implications of prioritising Green Belt preservation in this way, and the prices of doing so (in other than housing terms), which the NLP ignores, in relation to the particular kinds of value provided by green belt, both in general and by those with particular stakes in it. A basic argument is that unquestioning maintenance of the Green Belt status quo is not without costs for other Londoners and for other places within London – and we note that in the *corrected* IIA report knowledge about the social/environmental impacts of change in that status quo are recognised to be ‘inconclusive’, though the GLA preference remained simply one of avoiding it¹

2. Policy G2 and the Argument about London's Green Belt

In the rhetoric of the NLP, as well as in much external debate, real issues about Green Belt policy are obscured by their condensation into very broad-brush terms. Thus, Policy G2 (b) states that “The extension of the Green Belt will be supported, where appropriate. Its de-designation will not”. This sets up a crude blanket defence of green belt as a whole, counter posed with a view there is simply no need to draw upon it as a resource for housing, since a combination of brownfield re-use and intensification can accommodate the housing London needs. The practical adequacy of the latter strategies has been challenged in our earlier submissions on M10/M11, M19 and M39. The additional points to be made here are that this is not a black and white choice between two alternatives, but a matter of balance - where issues of preservation/access to open space and environmental sustainability are not simply associated with one side, *and* where there are important (but entirely neglected) aspects of social equity, in terms of which groups win/lose in these terms when Green Belt preservation is given the absolute priority accorded by policy G2.

As the NLP observes, without pursuing its implications, ‘London's Green Belt makes up 22 per cent of London's land area’ (8.2.1). In these simple quantitative terms, the issues are not simply

¹ Rather than potentially having ‘negative environmental effects, since it risks impacting habitats within the green belt and puts natural capital at risk’ as the original IIA report stated, with implied additional health benefits from G2 since protection would ‘provide space for activities such as physical exercise, mindfulness and community events-

ones of de-designating this area either in whole or large part - nor of using it as a direct substitute for available brownfield land within London. Rather, they are of whether:

- all of this very extensive area should be automatically excluded from development because it helps drive efficient re-use of previously developed land (8.2.1); or
- some use of London Green Belt land should be considered as part of wider attempts to secure a sufficient supply of land for housing development over the long run; and whether
- retention of GB status for all of it is actually the best way, in London circumstances, of achieving other intended 'good growth' outcomes of health, environmental sustainability and strong/inclusive communities.

The NLP (and its IIA supporting report) notably fail to address such questions, or offer clarity on the benefits associated with preservation of (various parts of it) and how these weigh against the opportunity costs elsewhere in the city, and for Londoners generally, of prioritising any/all Green Belt land. Ideas about what the main benefits might be have change over time. When the LCC first discussed it, the purpose was to give Londoners access to open space. This remains a public expectation, even though urban containment has become the official priority, preventing development but not assuring access (now available on around one sixth of the LGB)². In recent decades these kinds of benefit have been complemented by notions that building on LGB land is unnecessary so long as development 'capacity' is available on brownfield sites – and that protecting the former will speed up development of the latter.

In our earlier submissions (on M11, M19 and M39) we have shown both these notions as resting on false premises. These, and the whole question of how Green Belts (inside and outside London) impacts on housing supply will not be repeated here. Instead we will focus on relevance of the social and environmental aspects, particularly how they vary between areas, types of green site – and in their impact on different groups of more/less privileged Londoners.

3. The Opportunity and Equalities costs of Maintaining the London Green Belt Unchanged

Leaving the current area of green belt within London untouched and relying exclusively on brownfield land and intensification to meet housing need has consequences, not only (negatively) for the chances of succeeding in that aim, but also (with mixed effects) for quality of life, access to space and local environmental sustainability. These will vary across both areas and communities in London, with more positive effects close to the protected areas than for places/groups where pressure is transferred to.

Crucially, in relation to goals of delivering good growth for all Londoners this uneven geography also implies socially uneven effects, because of the correlation between:

- the uneven spatial distribution across London of green belt on the one hand (within certain parts of outer London), and of valued open space in intensification zones on the other; and

² Estimates range between 13% and 22% [<https://barneystinger.wordpress.com/2015/02/25/the-green-belt-a-place-for-londoners/>]

- the residential distribution of the city's generally more/less socially advantaged groups – including legally protected groups who are particularly likely to live in areas where intensification squeezes access to open space.

There are opportunity costs to protecting green belt which have implications for equality as well as for the overall greenness of London and Londoners' lives, and can involve legally significant discrimination too. This inequality is further exaggerated by conservation areas that also limit where intensification can happen and have a broad geography associated with more privileged local populations. And by the fact that access to green belt is easiest for people with larger properties who often also enjoy better opportunities to access parks with a lot of open space. These implications should at least be addressed openly within the NLP – and in impact assessments of it – together with ways of mitigating it.

4. Relating Green Belt to Other Types of Open Space in London

If, as social attitudes surveys suggest, public support for Green Belt is much more related to a 'green' concerns than to its 'belt' role a more functional and differentiated approach to green (and other) open spaces in London and their uses (by people and nature) would be much more appropriate than the NLP's practice of lumping them together at the level of argument (e.g. 2.02) – in defence of LGB which happens to be much the largest of them. Others serving particular functions more effectively deserve a priority that they don't get within a policy that (unrealistically) purports to provide full protection for all.

The early purpose of providing access to green open space for those living at higher density is better served by MOL which in general sits within Inner London. Given this and that there is much less MOL it would make sense to give particular strength/weight to policies protecting it. In practice the reverse seems to be the case with substantially greater losses reported from MOL than Green Belt, and very much more from local open space³. In practice there are trade-offs between them which need facing up to explicitly, in the policy statements and supporting text, including addressing likely losses of types of 'local' open space.

An important example is allotments, which have provided land to Londoners without gardens to grow food. Shortage of land for housing has placed these under pressure, recognised in a 2006 GLA report on London's disappearing allotments, though promised monitoring seems not to have been continued beyond 2007, and London's longest-surviving allotment space still faced threats of development for housing in 2017. The NLP favours growing more food in London, recommending protection for allotments as well as use of between-spaces. But where green belt is effectively defended, experience suggests this is at the cost of MOL, allotments and other open spaces – a plus greater intensification. This will have particular spatial characteristics and, again, we need better information regarding the groups to which the benefits accrue and on which the costs fall.

Considered in a more sophisticated way, green belt could be appraised for its contribution in supporting other open spaces; for example, by highlighting where opening access to green belt could contribute to the creation of a green corridor when combined with, say, MOL. A more careful appraisal of green belt on a case by case basis could in a similar way help contribute to understanding possible contributions to initiatives such as *London National Park City* while identifying other sites that make little contribution and where housing and other development might be appropriate alongside the robust protection of green belt that is making the most positive contribution and imposing the least cost.

³ The latest London Plan Annual Monitoring Report shows that in 2016/7 5% of lost protected open space came from green belt, 12% from Metropolitan Open Land and 83% (1666 ha.) from other 'local' open spaces.

5. Conclusion

The original draft of NLP offered potential protection against urban heat islands (UHIs) as part of the case for a blanket defence of the LGB, even though this was completely unsupported by the GLA's own guidance for decision-makers on how UHI effects could be reduced (e.g. by avoiding areas of over-concentrated development). The minor revisions dropped that claim in favour of a much fuzzier (but still unsupported) claim about 'climate resilience'. But we see this episode as yet another example of a familiar 'shifting of goal posts' in defences of the LGB, by both obfuscating and changing the justifications for it.

In place of such generalised claims-making - and the conflation of green belt/spaces - what we need (now especially) is openness and clarity about:

- what the green belt is; what it effectively does/doesn't do in different situations;
- what 'London' and Londoners want of protected green spaces in the city; and then,
- how far and in what form the LGB is the best means to achieve these goals

The NLP falls short particularly in failing to clearly explain: the opportunity costs as well as the benefits of a blanket preservation of the inherited LGB; and the uneven distribution of these benefits across communities, which clearly do not experience the same balance of gains and sacrifices.

In its present form policy G2 is unacceptable because of the arbitrarily political way in which (as argued in M1 and M11) spatial development strategies involving LGB reform were excluded from consideration as a contributor to reducing the housing delivery gap. If that were put to the side, the purely social/environmental issues addressed in this submission need to be dealt with in a much more differentiated and explicit way. This would include acknowledging that as amounts of MOL, green belt and local open space are lost each year some weighing should take place of when and where this loss is to take place. We note that green belt review sits with the boroughs. However, as argued in our response to M11, this does not, and should not, curtail a leadership role for the mayor in coordinating boroughs' reviews of green belt and of green infrastructure more widely.