

ORGANISATION	LONDON FIRST
ID	1588
MATTER	M12 OVERALL SPATIAL DEVELOPMENT STRATEGY

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

1. London First supports the infrastructure-led approach to growth that focuses intensification in accessible areas. Furthermore, we agree that it is prudent to plan for growth associated with the proposed major transport infrastructure projects. These are set out in the London Infrastructure Plan 2050 and the Mayor's Transport Strategy, and include projects such as Crossrail 2, the Bakerloo Line Extension and the DLR Extension to Thamesmead, which will all significantly increase the accessibility levels for parts of Outer London and thus allow substantial intensification of density compared to the existing situation. This, in turn, will support employment creation in the Outer London boroughs and lead to more sustainable patterns of development and travel in accordance with the Good Growth objectives.
2. However, London First is concerned that the detailed policy approaches on issues of design and density, Green Belt, small sites, industrial land, and sustainability and energy constrain the Plan's ability to deliver the spatial strategy for Good Growth set out in the draft Plan, principally with regards to the delivery of housing. We therefore believe it will be incredibly challenging to achieve the housing and employment targets set out in the draft Plan, even if all the proposed infrastructure projects are delivered and in a timely fashion.
3. In this regard, it is also significant to note that, whilst it is desirable to provide infrastructure in advance or in tandem with development, this may not always be possible, especially in Opportunity Areas. Indeed, delivery of development can provide the impetus for infrastructure delivery (including Government

commitment to funding where appropriate) as well as raise finance towards funding the infrastructure through the Community Infrastructure Levy (CIL) and S106 obligations. This is the case in the Vauxhall, Nine Elms and Battersea Opportunity Area, for example, where development is funding delivery of the Northern Line Extension. If it had been necessary to wait for the delivery of the extension, no homes would have been delivered yet, nor funds generated. Therefore, development should not necessarily be contingent on infrastructure provision.