

ORGANISATION	LONDON FIRST
ID	1588
MATTER	M13 OVERALL SPATIAL STRATEGY – INFRASTRUCTURE

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

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

1. London First supports the infrastructure-led approach to growth that focuses intensification in accessible areas, particularly in the outer boroughs. The Growth Corridors and accessible locations are defined by both existing and planned transport infrastructure. This includes major transport infrastructure projects set out in the London Infrastructure Plan 2050 and the Mayor's Transport Strategy, such as Crossrail 2 the Bakerloo Line Extension, and the DLR Extension to Thamesmead.
2. Policies GG2 (B) and D6 (A) in the draft Plan make it clear that intensifying the use of land and higher-density development should occur on sites that are well connected by public transport. In other words, it is suggested that intensification can only occur where existing public transport accessibility is good, and those areas where accessibility needs to be improved cannot be intensified until there is full commitment to the infrastructure projects set out in the London Infrastructure Plan 2050.
3. Transport infrastructure tends to be the element that requires the greatest public financial investment and it is helpful that the Mayor of London controls Transport for London (TfL) as well as strategic planning functions, so that intensification areas have the potential to benefit from a joined up approach and TfL funding.
4. Whilst it is desirable to provide infrastructure in advance or in tandem with development, this may not always be possible, especially in Opportunity Areas, which often require significant investment. 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 Battersea Opportunity Area, where development is partially 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.

5. Therefore, development should not necessarily be contingent on infrastructure provision, and Policies GG2 (B) and D6 (A) in the draft Plan should be revised to make specific reference to both existing and planned accessibility levels.

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

1. The London Infrastructure Plan 2050 identifies a range of priorities for London, from new energy, water and sewerage infrastructure, to enhanced digital connectivity and new transport schemes. Much of this investment is provided by the private sector, through the privatised utilities. Such investment is generally delivered reliably, though there can sometimes be a time lag in provision in fast-growing areas. Transport investment represents a high proportion of the overall costs and is often undertaken by the public sector. Transport is therefore the principal area where greater political certainty about future investment would be most beneficial.
2. We support the infrastructure-led approach to growth in the draft Plan and agree that it is prudent to plan for intensification associated with the proposed major transport infrastructure projects, even if the funding has not yet been confirmed and timescales for delivery are uncertain. We believe this to be a reasonable planning assumption, given the scale of need for future investment is well established and the case for future investment is broadly accepted.
3. The London Infrastructure Plan 2050 has been supported by successive Mayors, London Councils and the London business community. The need for additional investment in London's transport infrastructure was endorsed by the National Infrastructure Commission (NIC) in *Transport for a World City* (October 2016) and again in its National Infrastructure Assessment (July 2018). The NIC's analysis confirmed that new schemes such as Crossrail 2 were necessary to support London's continued growth and were affordable within its fiscal remit set by Government. The latest DfT rail passenger number and crowding statistics (July 2018) confirm that London commuters continue to experience the worst levels of overall crowding in the country.
4. As stated above in respect of (a), whilst it is desirable to provide infrastructure in advance or in tandem with development, this may not always be possible

and delivery of development can actually provide the impetus for infrastructure delivery as well as raise finance towards it.

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

1. We believe the London Infrastructure Plan 2050 and the Mayor's Transport Strategy provide a sound basis, justified by evidence, on which to plan London's future growth strategy. The Mayor's High Level Infrastructure Group, which meets three times a year, provides a forum in which significant changes to need or delivery timescales can be aired and addressed.