

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 TfL 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.