

# London Stansted Cambridge Consortium: Response to the Draft London Plan

## Introduction

---

- 1.1 The London Stansted Cambridge Consortium (LSCC) is delighted to have the opportunity to respond to the draft London Plan. We, along with our partners, recognise the importance of the Plan and see it as a key tool for us in achieving our 20 year vision: that the Corridor between London and Cambridge should become one of the top five global knowledge regions alongside San Francisco - Silicon Valley, Boston Route 128 and the Carolina Triangle.
- 1.2 We would note up-front that **we feel it is remiss that the draft London Plan does not specifically reference London to Cambridge the *UK's Innovation Corridor*** given: the economic potential of the area; its importance to the future growth of the UK; the range of partners (in and outside of London) united in the consortium; and the role the Corridor and Consortium can play in promoting and realising the benefits of Crossrail 2.
- 1.3 Our specific responses focus upon the UK's Innovation Corridor and its role in supporting London's growth. To this end, we have responded to the chapters of the London Plan which are most relevant to our strategy for the corridor:
  - Planning London's Future (Good Growth Policies)
  - Spatial Development Patterns
  - Housing
  - Economy
  - London's Green Belt
  - Transport
  - Sustainable Infrastructure
- 1.4 This note has been produced following consultation with a range of key partners involved with the LSCC.

## Summary

---

1.5 LSCC is generally supportive of the new draft London plan and welcome its focus on good growth, transport infrastructure, collaboration, sector growth and air pollution. Key points identified include:

- There are currently no references to London to Cambridge, the UK's Innovation Corridor in the document
- There is a need for clearer guidance on the role of authorities outside of London in meeting shared challenges around housing delivery, infrastructure and industrial land
- There is a need for elaboration and advice on the delivery structures for enhanced cross boundary working between London and South East partners
- Our partners have concern over the achievability of housing targets given restrictions on SIL, Green Belt and the general viability of small site development
- Rigidity of SIL policy and lack of clarity about what constitutes suitable industry (i.e. clean vs. dirty industry) needs further elaboration within the plan
- Lack of focus on strategic road infrastructure and its role in the London and wider South East economy is an omission, particularly given its importance to some of our larger industrial areas (particularly in Enfield)
- West Anglia mainline four tracking should be given greater prominence given its role as a catalyst for Crossrail 2, growth and regeneration

## Background

---

### London to Cambridge: The UK's Innovation Corridor

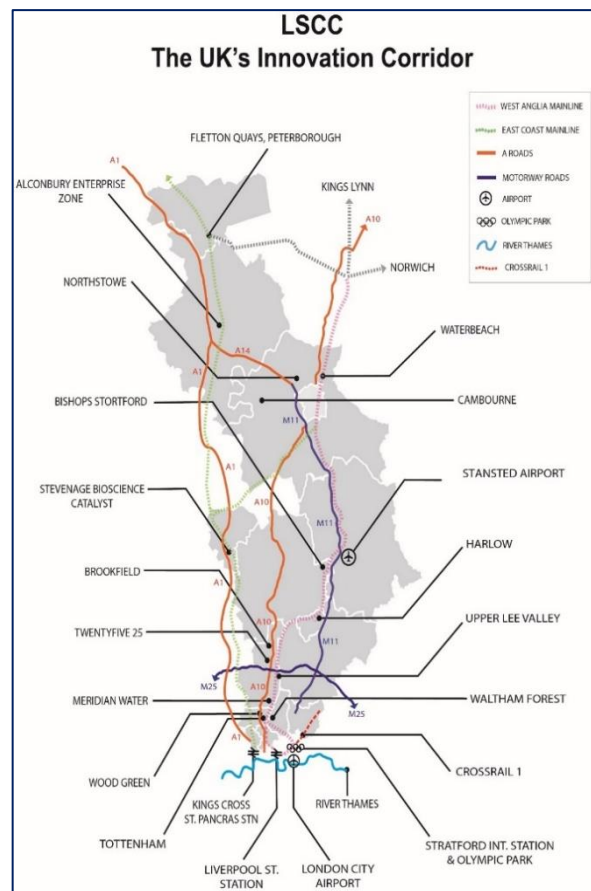
1.6 The UK's Innovation Corridor, linking London to Cambridge includes the area north of Tech City, the City Fringe, Kings Cross and the Lee Valley and moves up through the M11, A1, A10 and the East and West Anglia rail corridors (inc. Stevenage, Harlow and Stansted) towards Cambridge and Peterborough.

- 1.7 The functional economic area is the leading region in the UK for ideas, innovation and entrepreneurship which is a major reason why it has consistently outperformed the rest of the UK on a number of key economic measures. It is built on four pillars:
- **Innovation** - driving growth across the country through ground-breaking invention and discovery. There is an ecosystem of world-renowned research labs at the Francis Crick Institute, the Sanger Institute, Addenbrooke's Hospital and the Biocatalyst at Stevenage.
  - **Knowledge** - cultivating sectors driven from world-class universities at Cambridge and UCL which are linked by the Corridor. The Corridor is home to Microsoft's European Research and Development headquarters and the joint venture of Google and GSK at Stevenage.
  - **Connection** - outward facing, encouraging international trade and investment through Stansted Airport, the Eurostar and London City Airport. The Corridor's location on the Meridian means that it is ideally positioned for the US and Middle East.
  - **Growth** - opportunities for businesses to start and grow the Corridor as it links the two fastest growing regions in the UK. This is witnessed by investment in Stansted, the Google campus at King's Cross, Astra Zeneca's headquarters in Cambridge and investment from Public Health England in Harlow.

### London Stansted Cambridge Consortium

- 1.8 LSCC was formed in June 2013 as a strategic partnership of public and private organisations covering the same geographic area as the Corridor. The Consortium brings together public and private sector organisations which have the common aim of seeking economic growth, higher employment rates, providing places for people and business while preserving the quality and character of the Corridor.
- 1.9 The Consortium membership board has three simple objectives:
- **Promote the corridor:** which covers supporting Members with the development of the narrative for the corridor, promotion and positioning with government, Whitehall, and the investor community.

- **Make the case for infrastructure:** prioritising and focussing on the key infrastructure requirements which are needed to support growth. This includes London Stansted Airport as one of the key infrastructure components, as well as rail, road, digital and utilities.
- **Supporting our key sectors:** identifying growth spaces for expansion, supporting labour mobility, and encouraging skills development.



### LSCC Growth Commission

- 1.10 LSCC Growth Commission was completed in December 2015 for members of LSCC to provide a long-term vision for the Corridor. The final report outlines a 20-year vision for the Corridor that aims to establish the area as one of the top 'knowledge regions' in the world: (<http://www.lsccgrowthcommission.org.uk/wp-content/uploads/2016/07/LSCC-Growth-Commission-Final-Report-full.pdf>). It is in the context of this vision that we have responded to relevant themes below:

## Thematic Response: Good Growth Policies

---

- 1.11 LSCC is generally supportive of the six good growth policies set out in the London Plan. However, we feel that some of the policies run contrary to other policies set out in the plan. Partners have raised concerns about delivering housing targets while maintaining the quality of life of their existing residents. This is partly due to the propensity to deliver higher density residential uses in town centres and existing residential areas, driven in part by current land constraints and restrictions on Green Belt and strategic industrial land.

## Thematic Response: Spatial Development Plans

---

### Growth Corridors and Opportunity Areas (SD1)

- 1.12 LSCC are supportive of the Plan's approach to spatial planning through the introduction of the Crossrail 2 North Growth Corridor, the revision of Opportunity Areas and the identification of 'Strategic Infrastructure Priorities' to better connect London into the wider South East.
- 1.13 LSCC welcomes opportunities for growth through the homes and jobs targets outlined in the three opportunity areas in the corridor (Lee Valley OA, Wood Green/Haringey Heartlands OA and New Southgate OA). The Plan correctly identifies transport infrastructure as necessary to unlocking growth in opportunity areas as demonstrated by the emphasis on four tracking and Crossrail 2 in the Upper Lee Valley Opportunity Area and New Southgate Opportunity Area.
- 1.14 To unlock the full potential of the growth corridor the plan promotes effective cross boundary working arrangements between boroughs and other stakeholders. The continued work between LSCC partners on growth within the corridor provides a good starting point for cross boundary working arrangements. Reference to LSCC and the Innovation Corridor specifically in the plan would help to further develop these relationships and subsequent actions.

### **Collaboration in the Wider South East (SD2)**

- 1.15 LSCC partners welcome the Mayor's commitment to work with wider South-East partners to find solutions to shared strategic concerns. It should be noted that LSCC partners have been collaborating on a number of key issues for a long time.
- 1.16 LSCC recognises the Plan's reference to the mutual benefits for authorities across the wider South East in working together to tackle regionally important matters, such the effects of London's housing and labour markets and their related multiplier effects. However, clearer guidance is required to set out strategic plans and the role of authorities outside of London in supporting delivery. The impetus for spatial planning at the regional level requires collaboration between wider South-East partners and the GLA, and LSCC is keen to work with GLA partners to promote this in our area.
- 1.17 The plan also references the Wider South East Programme, a non-statutory strategic structure in place to coordinate approaches between authorities across the wider South East, facilitated by South East England Councils, the East of England Local Government Association, London Councils and the Mayor. Whilst this has supported a dialogue, LSCC partners call for the structure to be much tighter with a better focus on delivering tangible outcomes. The work of LSCC is a good example of best practice and should be referenced in the plan as a key partner of joint working and collaboration in the wider South East.

### **Growth Locations in the Wider South East and Beyond (SD3)**

- 1.18 LSCC welcome's the Mayor's commitment to work with relevant wider South-East partners, Government and other agencies to realise the potential of the wider city region and beyond.
- 1.19 Focus on investment in strategic infrastructure to support housing and business development in growth locations to meet need and secure mutual benefits for London and neighbour partners is welcomed. The plan's reference to new/garden settlements aligns with the aspirations of LSCC partners outside of London.
- 1.20 In response to the pressure for growth in London and the wider South East, the Plan expresses an interest to work with willing partners beyond London to explore potential to accommodate more growth in sustainable locations outside the capital. There is a mixed response in the willingness of LSCC partners to accommodate London's growth. The LSCC also require more clarity on how the Mayor envisages the work with willing partners and the role of local authorities in relation to this.

- 1.21 LSCC welcomes the concept of the 13 wider South East Strategic Infrastructure Priorities endorsed by wider south-east partners for initial delivery (LSCC area aligns with Strategic Infrastructure Priority number 4). As referenced above, the current plan does not make a reference to LSCC corridor in aligning with the Strategic Infrastructure Priority, which would be a welcome inclusion given that the Innovation Corridor provides the basis to realise the benefits of this investment.

## Thematic Response: Housing

---

### Increasing Housing Supply (H1)

- 1.22 LSCC partners in London understand the need to increase housing targets (and delivery) relative to the previous plan (specifically in Enfield, Redbridge and Waltham Forest). However, while we recognise the importance of delivering housing for Londoners, there are concerns around whether the targets are achievable given the restrictions related to Green Belt and SIL land. Further clarity is required on how the targets were calculated, how impact were assessed and the necessary steps needed for delivery. LSCC partners outside of London also require greater clarity on what the Mayor will do in the event that London's boroughs are unable to meet their target.
- 1.23 Better utilising small sites is recognised as important to contributing to housing supply. LSCC partners do however, question whether small site housing targets are achievable given the challenge of viability on schemes of 25 units and below for both the public and private sectors. Furthermore, there are concerns about whether delivering a high proportion of housing targets on small sites will impact on quality of life for new and existing residents.
- 1.24 LSCC recognise the strategic affordable housing target of 50% and threshold target of 35% (enabling fast tracking of schemes), given the extent of affordable housing need identified in the 2017 SHMA. However, these policies need to remain flexible for areas with lower land values as they may attract growth and development due to viability issues. There are also concerns about the viability impact of 50% affordable threshold for housing on the release of public sector land, SIL and local strategic industrial sites.

## Thematic Response: Economy

---

### Industrial, Logistics and Related Land Uses (E4, E5, E6)

- 1.25 The Plan establishes a general principle of no overall net loss of industrial floorspace in SILs and Local Strategic Industrial Sites (LSIS) in London and designates most boroughs within LSCC for the “retain capacity” approach.
- 1.26 LSCC recognises the need to retain industrial land and floorspace capacity given loss of supply in the last decade and the importance of supporting industrial, logistics and related uses. Providing space for logistics sector is particularly important, given the strength of the sector in the corridor and acknowledged growth in demand.
- 1.27 LSCC partners, however, have concerns around the simplicity and rigidity of the policy and the implications on strategic planning. Some London boroughs lack available employment space suitable for key sectors (as identified in the plan) and the rigidity of SIL further constrains these boroughs in growing diverse “good economies”. Partners are also worried about whether restrictions could result in decisions that do not consider the most appropriate spatial and urban planning solutions.
- 1.28 We feel a more nuanced and flexible position on the land use classes that can be considered on SIL sites is required and greater clarity on conditions for release is needed. This would help boroughs identify suitable intensification, consolidation, co-location and relocation opportunities within SIL (as referenced in the plan). LSCC is keen to collaborate with GLA partners to work towards a joint vision for the future of SIL uses.

### Sector Growth Opportunities and Clusters (E8)

- 1.29 The new Draft Plan provides the planning framework to deliver workspace for business and employment. This is intended to complement the Mayor’s Economic Development Strategy (EDS) which identifies sector opportunities and clusters.
- 1.30 Several sectors are identified which mirror the key growth sectors in LSCC Agenda for Jobs, Growth and Improved Liveability report published in 2014. This includes Life Science and Medical; IT; Digital and Media; Low Carbon, Clean Tech and Energy from Waste; and Financial and Business Services. The LSCC fully supports attempts to grow these sectors as



it will help with our aspiration to become one of the primary 'knowledge regions' in the world.

- 1.31 LSCC partners aspire to deliver business and employment growth in these key sectors. There is a concern that central London will deliver high quality jobs whilst low quality jobs will be pushed to outer London and the corridor (particularly given the constraints of SIL land). LSCC is keen to work with GLA partners to ensure the benefits of key sectors are realised in all areas of the Innovation Corridor.
- 1.32 The LSCC Agenda for Jobs, Growth and Improved Liveability also identified food production and engineering, transport, logistics and distribution as priority sectors for the corridor. Whilst these are not classified as priority sectors, the importance of these activities in supporting and enabling priority sectors (i.e. through supply chains and innovation) should not be overlooked.

## Thematic Response: Green Belt

---

### London's Green Belt (G2 and G3)

- 1.33 LSSC and our partners understand the argument for the continued protection of London's Green Belt and Metropolitan Open Land, in accordance with the National Policy Planning Framework (NPPF). However, in light of high housing and employment targets partners call for a more open discussion around the Green Belt and greater flexibility to adopt tailored approaches where locations are of poor quality, have low environmental importance and are not accessible for leisure use.
- 1.34 Partners agree that housing delivery may not be possible without some release of Green Belt land and in the absence of a clear strategy the release of green belt will be piecemeal and may not take into account strategic considerations. An amendment to the policy could provide the corridor with a means of accessing development potential of strategic sites more easily.

## Thematic Response: Transport

---

### Strategic Approach to Transport (T1)

- 1.35 We generally agree with the Plan's target for 80% of all trips in London to be made by foot, cycle or public transport by 2041. However, plans to reduce car usage should consider the challenge of transport connectivity in outer London authorities, particularly where east to west movements via public transport are challenging. Reducing car usage will only be possible with greater transport connectivity, including four tracking of the West Anglia line and Crossrail 2.
- 1.36 Furthermore, the plan fails to raise the importance of road infrastructure in supporting the distribution and logistics sector. Improved road infrastructure is vital to ensuring that these sectors grow and London and the wider area remains productive.

### Crossrail 2 and Four Tracking

- 1.37 The Plan's support for Crossrail 2 and the regeneration impacts on the locations it serves is supported by LSCC. It is welcome to see both Crossrail 2 and the four tracking of the West Anglia line on the indicative list of transport schemes, giving local authorities the power to refuse development proposals that do not provide adequate protection of the schemes.
- 1.38 LSCC, however, would expect to see the four tracking of the West Anglia line given greater prominence within the plan and the Mayor's rhetoric. We believe that transport infrastructure improvements outside of London are vital to the capital's continued growth and success. Greater emphasis is being placed on infrastructure improvements within the London boundary which may be short-sighted. This intervention is vital to the success of Crossrail 2 and unlocking the regeneration and growth opportunities it could bring to London and LSCC.

### Freight and Servicing (T7)

- 1.39 Whilst LSCC are in favour of the Plan's aims to facilitate sustainable freight movement in London, strategic and major road infrastructure networks are not given enough prominence. We would encourage collaboration to ensure road infrastructure is developed and strengthened in the right way, particularly along the A10, M25 and M11 routes.

### Aviation (T8)

- 1.40 Aviation is a major pillar of LSCC economy, with Stansted and London City contributing to employment and facilitating the success and growth of several high value industries within the corridor. As such LSCC supports the Plan's acknowledgement of the importance of London's major airports in providing essential connectivity for passengers and freight, supporting investment and providing and supporting significant numbers of jobs.
- 1.41 The Mayor supports the case for additional aviation capacity in the South East of England, providing it also meets London's passenger and freight needs. LSCC partners are keen to realise the potential economic benefits provided by additional aviation capacity at Stansted, as long as this is balanced with environmental and social impacts to local communities.

## Thematic Response: Sustainable Infrastructure

---

### Improving Air Quality (SI1)

- 1.42 LSCC appreciate the need to improve air quality in London and the classification of Air Quality Focus Areas along the corridor are important to addressing this. LSCC raises considerations of how improving air quality might impact on the freight, logistics and distribution sector in the corridor and whether this is possible along strategic transport routes such as the A10, M25 and M11. LSCC are keen to work with GLA partners to work towards a joint solution that contributes to the continued improvement to air quality. in London and the wider South East

## Appendix Consultation

1.43 To produce this formal response we held a roundtable discussion and workshop on 19<sup>th</sup> February. We had attendees from the following organisations:

- Broxbourne Borough Council
- Cambridgeshire County Council
- East of England LGA
- Essex County Council
- Garden of Ideas
- Gener8 Finance
- Harlow Council
- Karakusevic Carson Architects
- Lea Valley Park
- London Borough of Enfield
- London First
- London Pensions Fund Authority
- London Borough of Redbridge
- Middlesex University
- NLWA
- Regeneris
- Uttlesford District Council
- Weston Williamson

1.44 A number of in-depth consultations were also undertaken with key stakeholders across LSCC area. Responses came from:

- Harlow Council
- Epping Forest

- Cambridge City Council
- South Cambridgeshire District Council
- London Borough of Enfield
- Hertsmere Borough Council
- Hertfordshire County Council
- Broxbourne Council
- Uttlesford District Council