

# RTPI response to the London Infrastructure Plan 2050 Consultation

Friday, 31 October 2014

## About the RTPI

The Royal Town Planning Institute (RTPI) is the largest professional institute for planners in Europe, representing over 23,000 spatial planners. The Institute seeks to advance the science and art of spatial planning for the benefit of the public.

## Main points

- Health facilities should be considered in a comprehensive infrastructure plan
- More regional cooperation with East of England and South East is needed
- Fragmentation of utilities has resulted in too little emphasis on growth
- Delivery Board should include experts in spatial thinking such as planners
- More should be done to plan for housing and transport together

## General response

The RTPI welcomes the publication of the London Infrastructure 2050 Plan which asks critically important questions including what infrastructure will be needed, where it should go, how can we deliver and finance it. It is possibly the first recent plan in England to identify the infrastructure necessary to support land use change.

The plan correctly points out that despite successes such as Crossrail being on time and budget, and the growth in the number of cyclists London's infrastructure is at a competitive risk and will require improvement in areas. A critical point in the upcoming *Planning Horizons* paper *Creating Economically Successful Places* is that the world's economy led by cities is changing faster than ever before. This will require making better use of data, longer-term thinking and strong leadership and capacity of leaders and planners.

We welcome the scope of the plan and particularly its acknowledgement of wider health implications alongside more obvious infrastructure. However, the plan should go further, by covering health care infrastructure such as A&E and urgent care facilities, GP surgeries and hospitals. Whilst it is understandable why health facilities may not be covered given the Greater London Authority's limited involvement in this area and external reviews, a truly comprehensive spatial representation of London's infrastructure needs should include the provision of health facilities. More on the relationship between planning and health can be found in the recent *Planning Horizons* report [Promoting Healthy Cities](#).

The plan should be applauded for recognising the importance of securing cross-party support for major infrastructure projects. This point has been included within the RTPI's three most-recent policy papers: [Delivering Large-Scale Housing Developments](#), [Transport Infrastructure Investment](#) and [Fostering Growth](#).

To maintain the momentum for major infrastructure projects the backing from neighbours such as local authorities in the East of England and the South East is also needed. In [Fostering Growth](#) we make the case for the need for planning across functional economic areas, which is relevant to London as it grows. Later this year the RTPI will also be publishing a paper on strategic planning focusing on how local authorities can be incentivised to work collaboratively across boundaries (an interim paper [Beyond 'Cooperation'](#) for England has been published).

We regret that the plan was not coproduced with surrounding counties, especially considering that it is not a statutory plan and therefore open to innovative solutions. We recognise that the abolition of the London and South East Regional Planning Conference (SERPLAN) and the creation of three regions afterwards has made planning London in this context more difficult than before. Yet arguably the urgency of dealing with this has never been greater. For instance, the "major growth potential North of London" identified in the plan may have no support locally, in which case its identification lacks purpose. We are also curious as to why, when considering areas outside the jurisdiction of the Mayor, particular concern to avoid the Green Belt applies.

On the other hand, we welcome the consideration of transport capacity outside London as the basis for making growth allocations. Far too many commentators suppose that simply building at stations in the Metropolitan Green Belt will solve London's housing problems. It would be encouraging to hear the Mayor more powerfully emphasise this point, especially as the implications for Transport for London and national rail within London would be most serious.

## **Responses to select consultation questions**

### **1) Do you agree with the need for an infrastructure plan for the capital? Do you support our approach? If not, why?**

The RTPI strongly supports the need for an infrastructure plan. The exercise of developing a plan such as this provides much needed certainty and clarity. A fully spatial plan for the London region properly linking infrastructure investment and regional growth would be beneficial. Initial work conducted by AECOM indicates a shortage of nearly one million homes as yet unidentified in the London region (i.e. within a potential 60 minute commute). It would be beneficial for other areas whether they be Local Enterprise Partnerships or Combined Authorities to also develop infrastructure plans which would then be incorporated into the National Infrastructure Plan.

**3) We have identified a significant funding gap with regard to the infrastructure that we think London will need. We have also set out a menu of options to help close the gap. Which of these should we pursue and why? Which not and why? Are there other options we haven't considered which you think need to be addressed?**

There may be scope to capture more uplift in property values in the future especially given the proposals set out in the plan exceed available funding. The RTPI believes that we need to identify better ways to ensure that the importance of infrastructure provision, as a key driver of growth and transformation, is fully recognised. This will enable greater consensus to be achieved, and barriers removed. There are huge and varied benefits to be gained from effective, integrated, and strategic planning of transport infrastructure, benefits which can improve people's lives which cannot be reasonably captured in any current, quantifiable appraisals mechanisms. However, to fully realise these benefits, we need to become better at planning transport infrastructure both across and between modes and also in combination and cooperation with development priorities in other sectors.

There are many examples where development has not taken place, or is at risk of not taking place, because the private sector has been required to take on positions of risk, related to the funding of infrastructure, which it deems too costly. In these situations the public sector, or potentially the London Enterprise Panel could play a role in absorbing risk to facilitate development where it believes this will enable growth in the local area. Regarding infrastructure-led development, it is reasonable and fair that those who benefit from uplifts in land value are required to make contributions to infrastructure funding. For more information please see [Transport Infrastructure Investment](#).

**4) Will the London Infrastructure Delivery Board be enough to ensure best-practice joined-up delivery of infrastructure in London? What more could the Mayor do?**

The issues raised in the plan on the conditions for delivery are of utmost significance and the analysis given of regulation is well argued. We are concerned that the regulatory arrangements for the fragmented utility industry appear to place growth as a low priority. This issue is a major barrier to growth and it is time that more organisations joined with the GLA to make this clear. Often 'planning' is blamed for the lack of growth when 'fragmentation' is more responsible.

We support the London Infrastructure Delivery Board as a first-stage concept, but consider that real change will only happen when regulators are required by Ministers to change their behaviour. We note the proposal would place a duty on utilities to consult the Mayor but such duties have not proven hugely successful in other contexts. We consider that a stronger obligation should be placed on utilities, Network Rail, the NHS and others to require conformity with the London Plan. Or failing that regulators should be required to provide for and support local growth as an objective alongside prices. Equally the London Plan should be examined in such a manner as to make such conformity plausible.

The Board on its own is probably not enough; joined-up thinking is needed across all departments which requires the approach to be institutionalised. The RTPI urges for

some members of the board to have planning expertise and spatial awareness to ensure these unique skillsets are part of the process. For more information please see [Thinking Spatially](#).

**7) Regarding technological change, do you agree with the proposed approach? What technological advances should London be taking account of or be leading?**

The plan does an effective job of beginning to anticipate the future needs of London whilst not overly focusing on one particular technology. For instance, it is sensible to avoid defining ‘high speed digital connectivity’ as standards are bound to change. Though the plan does proactively recognise the importance of working closely with University of Surrey (outside the boundaries of the GLA), a leader in 5G development, to bring 5G technology to London first. It is worth pointing out that as the plan demonstrates, investment in technology such as high-speed internet is relatively inexpensive compared to other investments, and brings substantial benefits to the overall economy.

It is correct to plan for a degree of flexibility in relation to technological change so that places can be open to radical change such as ‘solar roads’ and ‘hardwiring’ innovation through projects like Crossrail. It is also correct to embrace existing technologies such as Building Information Modelling (BIM) which is already increasingly being used and is expected to continue. A BIM4Planning task group has been set up with the aim of identifying the regulations and standards that are relevant for planning and make recommendations as to the best way to develop.

**8) How can we change behaviours to reduce demand for key infrastructure? To what extent could demand side changes affect, for example, our energy needs or over-crowding on London’s transport?**

The ‘sharing economy’ may change people’s behaviours as the need to own personal vehicles and other goods decreases. This shift in behaviour would lead to fewer individual cars on the road meaning fewer parking facilities being needed, and less congestion.

**9) Do you have other suggestions for how we could more effectively unlock housing sites with the help of infrastructure?**

Lack of infrastructure is one of the main barriers to growth identified in our work on housing delivery across England and Scotland. People partly oppose growth because they know it will place burdens on public services; planning permissions sometimes can be refused or not built out when granted because no organisation will accept responsibility for infrastructure provision.

In countries like Germany, French and Holland local authorities buy land, front fund the infrastructure investment and then sell the land in parcels to developers. Land value uplift is kept by the local authority to fund initial costs. For further information see [Delivering Large-Scale Housing Developments](#) (recommendations 5 and 9).

Transport must be linked to wider policy objectives such as housing and employment. If the housing crisis is not adequately addressed London’s economy

will likely suffer as key workers, young professionals and immigrants, who all enable the efficient functioning of London will be unable to afford living there.

**12) Which transport innovations do you think will have the most impact and why? How can we encourage their development?**

Focusing on increased efficiency including increased frequency of Network Rail trains and 50% increase in mass transit capacity seems to be the correct approach.

**13) How clear is our approach to tackling road congestion? How significant do you think promoting walking and cycling could be as part of the solution?**

Streets should be designed for all forms of transport including walking and cycling. They should not be considered separate issues as they achieve the same objective.

**14) What do you think of the vision for increasing step-free access on public transport?**

It is important to design places that are able to be used by a wide-range of people with different needs. If these issues are addressed upfront, the costs are dramatically less than if future changes are needed.

**15) Are there strategic green infrastructure objectives that should be prioritised? If so, are there any specific initiatives needed?**

Measures that add the most value should be prioritised for all forms of infrastructure, but a holistic view of 'value' as advocated in [The Value of Planning](#) is needed.

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<http://rtpi.org.uk/knowledge/publications/>

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