

Transcript from Examination in Public – Contribution of Caroline Shah (AKA C Scott)

Friday 8 February 2019 and Monday 11 February 2019

**Housing supply (SHLAA) and targets [M19]**

Audio Recording: [https://airdrive-secure.s3-eu-west-1.amazonaws.com/london/dataset/london-plan-eip-2019/2019-02-15T15%3A10%3A52/EiP%20-%2008%20February%202019.wav?X-Amz-Algorithm=AWS4-HMAC-SHA256&X-Amz-Credential=AKIAJJDIMAIVZJDICKHA%2F20200510%2F2019-02-15%2Faws4\\_request&X-Amz-Date=20200510T141931Z&X-Amz-Expires=300&X-Amz-Signature=4390b8437b8ce84bfd59c7e36d562f0ff37d4acba3811a61989250f3394ee83&X-Amz-SignedHeaders=host](https://airdrive-secure.s3-eu-west-1.amazonaws.com/london/dataset/london-plan-eip-2019/2019-02-15T15%3A10%3A52/EiP%20-%2008%20February%202019.wav?X-Amz-Algorithm=AWS4-HMAC-SHA256&X-Amz-Credential=AKIAJJDIMAIVZJDICKHA%2F20200510%2F2019-02-15%2Faws4_request&X-Amz-Date=20200510T141931Z&X-Amz-Expires=300&X-Amz-Signature=4390b8437b8ce84bfd59c7e36d562f0ff37d4acba3811a61989250f3394ee83&X-Amz-SignedHeaders=host)

1. From 01.19.30 – 01.26.46
2. From 01.43.02 – 1.43.53
3. From 05.41.35 - Michael Edwards, Just Space, explicitly speaking on my behalf

1. **Effect on biodiversity and the environment; large site targets agreed without proper assessments**

I have a few points I want to make on behalf of just space and also relating a little bit to Kingston. We don't believe there is an integrated approach to site selection in the London Plan and that this has huge environmental and social implications. There is a loss of green space, a loss of communal space, **a loss of biodiversity**, and a **huge detrimental environmental impact**.

We also believe that a lot of development is leading to gentrification of areas and I'm not just looking talking about regeneration here , I'm talking just about some of the developments that are going on in that they are creating demand not fulfilling demand. So, for example in Kingston where I live, a lot of the developments going up being sold in Malaysia, Hong Kong and Russia. So they're not meeting local demand at all and they're becoming investment properties.

An example I'll give of the detrimental effect on the environment is the Hogsmill Valley which I believe is put forward for the SHLAA to help define the targets for Kingston. And 8500 units are being proposed on that, and I think that's one of the major contributors to our 17,000 large site targets in Kingston. And that's an area of very rich biodiversity which doesn't appear to have been assessed at all. Other areas, I think, that had been put forward, I think, include the green belt in Chessington , I have a list of the areas I believe are being considered. They are definitely not brownfield sites but I think that they are going to be part of the opportunity area.

The need for community involvement . I don't think there's been community involvement; I think that's true across the board in a lot of the areas that are seeing significant development. I don't know if it's true in areas like Richmond, for example, where development is much smaller but certainly in Metropolitan town centres and areas that are designated as opportunity areas, and *I think that people don't know about the development that's about to hit them. I certainly know in Kingston, the majority of residents don't know we are about to become an opportunity area and they also don't know that, if Crossrail two comes, we will get 16,000 extra homes.*

There's another issue I have. The next one, which is the cumulative increase in density. So, if you're a Metropolitan town centre, anywhere within one kilometre of that has central density, if anywhere in London that is an opportunity area has a further uplift in density, and then, if you are a Metropolitan

town centre, an opportunity area with Crossrail 2 you get extra. So, the effect of that socially and environmentally is massive and I don't think that has been taken into account.

The effect of Crossrail is at the end of the London plan, at the end of the SHLAA. It's not really integrated into the effect it will have on these areas and comma again, to refer to Kingston because I know it, Kingston is an established place. It is actually more than established, it is an ancient place. And to impose this kind of massive development on an established place, on established communities, on the environment and the surrounding environment is, in my opinion, irresponsible. And I imagine there must be other areas in London to which this must refer.

So moving on to my penultimate point. It seems like designating a place like Kingston as an opportunity area is extending opportunity areas beyond brownfield Science and saying we just want **whole Boroughs to become subject to this kind of massive development which has not been properly assessed. And it seems to avoid the need to look at proper alternatives and to do impact assessments.**

And I think that if you can't deliver the housing that's needed you need alternatives. So actually it would make sense from a builder's, from a developer's point of view also to look at alternatives. This is not a community saying we don't want it, it's saying let's do what's right, and in the places that you're doing this development this is not right. It has not been thought through. And actually what it is doing is creating conflict between councils and residents; it is creating a lack of social cohesion and is probably going to create some unrest. So, I think the kind of blanket designation was seeing for some opportunity areas is wrong and it won't be deliverable without huge damage to society, to the environment and to communities.

My last point is the funding gap. I used to work at a rating agency so I look at finances quite a lot. How is this deliverable? £3 billion a year is needed for homes. What really worries me is that point 11.123 says that CPOs are probably going to be needed to make land available. I mean, how many people are we going to turf out of our homes in order to get land available for this plan to work? And that really worries me. It's just one point in there.

£22 billion needed for schools. Kingston, for example, our special needs schools provision is in crisis. It is forecast to generate a deficit so big that we will be out of business next year unless we turn it round. There are huge issues here so again, I don't know how many areas for mass development have similar problems as Kingston, but with this sort of huge problem in special needs alone, how are we going to cope from a social infrastructure point of view with even more development?

Health the same. Apparently, developer contributions contribute to the £4.5 billion needed over five years. Will we get enough? The National Audit Office today announced that we are not getting enough from developer contributions. So how can we be confident we will get the £4.5 billion pounds we need to fund the NHS, which apparently, the £4.5 billion we need just to keep "operationally functional". How can we do that?

And £200 billion for utility infrastructure and £3 billion pounds a year to deliver these homes, which is the funding gap that we have identified or the GLA has identified. These are massive issues here and I look at the area I live in, which is Kingston, and I think this kind of plan cannot be delivered and ***I think that we should revisit the nascent opportunity areas and take them out*** because the damage that could be caused socially and environmentally by following this plan is incredibly huge.

Inspector: of course, we talked about opportunity areas previously so....

C. Shah: *but it's about the growth everywhere*. They are just a great example of if you take it at a huge level the implications are bigger and you've got the cumulative [effect] - you know the Metropolitan town centre and the opportunity area and the Crossrail 2 [effect]. Some places in London will have some of those but I'm just showing you what the cumulative effect will be.

Inspector: I understand your point.

## 2. Areas of deficiency

On the environment, there is something I missed out. It is not about foreign investment. It is about areas of deficiency.

In some places, where there are very significant housing targets being set, there are already big areas of deficiency for open spaces.

And I noticed in G4 E3 it talks about cross-Borough provision and I'm a little bit concerned about that, particularly in an area like Kingston where you've got **European sites** of - whatever they are called - but **really special scientific sites like Richmond Park** if you rely on [Inspector: I know, I know] those green areas to take everything from what you're building as a city in an adjoining Borough. First of all, you are going to increase the areas of deficiency in the Borough, but you are also going to put **a lot of pressure environmentally or the surrounding area which is meant to be protected**.

So that was just the point. I think it's really important that that is considered.

Inspector: Yes. Thank you for that.

## 3. CrossRail 2 additional capacity committed in SHLAA

I have two small practical matters. I was expecting to be joined today by Caroline Shah, who was with us on Friday, but she has a family bereavement and had to cancel and therefore isn't here.

She asked me if I would particularly refer to one matter, which I will very briefly do, which is, that in some parts of London, **targets for the longer term clearly include major additional capacity opened up by Crossrail 2**.

**She is from Kingston which, according to the SHLAA Appendix 8, Table 2 [should read chapter 8, table 2] can expect to see 16,000 additional housing targets placed on them**. It made me look at the table again and see in Harringey, where I live, there's nearly 20,000 additional homes to be added to the target as and when Crossrail 2 should come on the horizon. These are very, very major matters which we haven't really discussed and maybe we can discuss them later in the EiP, but they are a very big thing. They add up to 100,000 additional dwellings across London as a whole. Crossrail 2 additional capacity. So, I just wanted to put that on the record as a matter which really hasn't come up Friday and today.