

## Appendix A: Response of the City of London Corporation to the Mayor's Consultation on the draft London Infrastructure Plan 2050

### General Points in the City Corporation's Response

1. *The City Corporation welcomes this pioneering and ambitious attempt to set out the infrastructure implications of the significant future growth projected for London and agrees that such long term planning is essential to the long term success of London as a world city. Such planning needs to retain flexibility where practicable to allow for unforeseen events and trends.*
2. *The draft LIP2050 recognises that employment growth is likely to continue to be concentrated in central London and therefore infrastructure investment needs to address the current deficiencies and future needs of central London, including the City, as a key employment centre. This approach complements the spatial strategy already set out in the London Plan.*
3. *Key elements of infrastructure needed by central London are good public transport to the centre, reliable energy, excellent digital connectivity throughout buildings and the public realm, efficient highway management using the latest smart technology, and high quality green infrastructure to act as a foil to the expected intensification of activities and population.*
4. *Housing growth and community facilities are likely to be more evenly dispersed across London but good public transport access from residents to jobs will remain essential for such communities to be sustainable. Effective housing delivery that is affordable for and accessible to London's workforce will be critical to London's long term success.*
5. *Climate change will be more apparent by 2050 so needs to be addressed more directly in the document. New infrastructure should be designed to help reduce the risks of climate change and to be resilient to the inevitable effects. Green infrastructure can play an important role in mitigating climate change and adapting to its effects. The City Corporation plays its part as a key guardian of open space in and around London. The proposed 'task force' to review London's green infrastructure management structures, governance and funding is welcomed.*
6. *The proposed London Infrastructure Delivery Board is a welcome innovation to overcome existing disjointed arrangements for infrastructure delivery. It will need to be complemented by greater local financial flexibility and innovation to enable London to address its particular needs. There is scope for closer cooperation between public-private and between different public bodies to deliver services more efficiently in financially constrained times.*
7. *City Corporation welcomes the ambitious mix of infrastructure improvements set out in Section D of the document and considers that further debate will be needed to establish priorities. Projects that are particularly welcomed are the diverse rail and tube improvements to increase capacity to and across central London, the highway and public realm design and management improvements in central London to address congestion issues, the digital connectivity improvements and 5G aspirations,*

*electricity investment ahead of demand, the Thames Tideway Tunnel, and the Thames Estuary 2100 flood defences.*

8. *A significant omission from the document is the recognition that most physical trade is still conducted through shipping and that London is a great port and a world centre for maritime business. London infrastructure for maritime trade needs to keep pace with future changes and it needs to be planned at a regional level that is not constrained by artificial Greater London boundaries. There is also insufficient recognition that the River Thames is a major transport artery with potential for greater passenger and freight traffic in the future.*

### **Question 1**

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

9. *Agreed. London needs a long term infrastructure plan to manage significant change and growth during the coming decades. The broad approach taken seems reasonable. The City Corporation welcomes the ambitious mix of infrastructure improvements set out in Section D of the document and considers that further debate will be needed to establish their priorities.*

### **Question 2**

Is any of the infrastructure identified unnecessary – if so why? What (if any) infrastructure do you think London will need in addition to what we have identified? Why?

### **Response**

10. *The identified types of infrastructure are necessary for London to grow as expected but there is scope for considerable debate over the specific projects proposed.*
11. *There are several omissions from the identified infrastructure:*
- *Transport infrastructure focuses on travel by land and in the air but pays insufficient attention to the importance of travel by water. London is a major international port responsible for a significant part of UK trade. This trade needs to be encouraged and planned for with sufficient port infrastructure that is accessible to major domestic markets.*
  - *The River Thames is a major river and transport artery into the capital that should play a greater role in the sustainable transport of goods and passengers. The major wharfs found within London and further downstream make it possible to transport heavy goods, construction and demolition materials, and waste, sustainably by river. This reduces lorry movements on London's roads benefitting safety and air quality objectives.*
  - *The network of public passenger piers located along the Thames need to be exploited further so that river transport forms part of an integrated public transport network for London. The piers themselves and the services using them need long term management if they are to fulfil a greater role in the future.*
  - *Green infrastructure recognition is welcome but it needs to be delivered in a*

*network of regional, strategic and local open spaces to provide the essential foil to projected intensification.*

### **Question 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?

### **Response**

*12. The funding gaps are unlikely to be filled by a single option and therefore all options need further investigation. Funding mechanisms need to recognise that infrastructure is often a long term investment with long term returns and benefits. Infrastructure projects can bring significant benefits to nearby locations and it is important that such locations make an appropriate contribution to the cost of the infrastructure.*

### **Question 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?

### **Response**

*13. The proposed London Infrastructure Delivery Board should help achieve greater integration and complementarity in infrastructure delivery. It will help address existing difficulties caused by market fragmentation and a short term outlook. However there is a need to address regulatory failings that discourage investment ahead of need even though this is an essential component of long term infrastructure and regeneration planning.*

### **Question 5**

Where do you think London's growth would be best accommodated (please explain why)? Are there alternative spatial scenarios we need to analyse?

### **Response**

*14. The London Plan provides a strategic context for the spatial pattern of London's growth. It recognises the key role of central London, including the City, as a dynamic economic centre offering employment opportunities that are accessible sustainably by an extensive public transport network. Continuing investment in this regional public transport network is essential for sustainable long term growth.*

*15. The London Plan will need updating to address changing circumstances but is a good starting point. It is important to recognise that London is at the centre of a large city region that extends beyond its formal boundaries. Therefore long term infrastructure planning needs to be undertaken on a regional basis with employment and housing linked by good transport network.*

**Question 6**

Do you agree that incentives on utility providers should be amended to enable investment costs for growth to be shared more widely? How practically can this be achieved? If not, why?

**Response**

16. *Utility regulation needs to be made more flexible so that a wider range of investors can share the costs and eventual rewards, and there are greater incentives for investment ahead of need. Successful strategic regeneration is a long term exercise that cannot rely solely on short term market driven demand.*

**Question 7**

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

**Response**

17. *The importance given to digital connectivity in the document is welcomed as this has become an essential requirement for business and personal life. Good digital connectivity will complement London's other advantages such as time zone, language, skilled workforce and quality of life.*

18. *Digital connectivity will need to be ubiquitous to reflect the trends of increased mobile working and greater use of the public realm for business as well as leisure. Provision will need to be adaptable to respond to the increasing pace of change so that it does not become obsolescent.*

19. *London should use technology to reinforce its current strengths in science, medicine, education, finance and business services so that London-based businesses remain world leaders as these fields evolve.*

20. *London should be integrating technology and data to bring 'smarter' urban management that provides goods and services more efficiently to Londoners. Pioneering transport management successes such as the congestion charging zone, Oyster card and cycle hire scheme need to be complemented by initiatives in other types of infrastructure such smart metering and smart demand management for energy and water to reduce waste and drive efficiencies.*

**Question 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?

**Response**

21. *Behaviours can change if users have a flexible approach and better information enables them to use such flexibility to avoid costs or problems. For example better transport information and cost incentives can change travel behaviour concerning travel time, mode and route. Similar approaches could be applied to water, energy and waste infrastructure to change the nature of the demand and*

*the consequent total infrastructure capacity needed. Smarter urban management will make possible changes to behaviour that make better use of existing infrastructure and better prioritisation of future infrastructure investment.*

## **Selected Other Questions**

### **Question 11 Transport**

Given funding constraints, what transport projects do you think we need to prioritise?

#### **Response**

*22. The draft LIP2050 recognises that employment growth is likely to continue to be concentrated in central London and therefore transport infrastructure investment needs to address the current deficiencies and future needs of central London, including the City, as a key employment centre. This approach complements the spatial strategy already set out in the London Plan.*

### **Questions 15 and 16 Green infrastructure**

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

What are the key issues that the proposed Green Infrastructure Task Force need to consider?

#### **Response**

*23. A key issue facing all providers of green infrastructure is the need to maintain the quality of management and facilities for visitors during a period of financial pressure when statutory priorities are more likely to retain funding than discretionary spending on green infrastructure. Unless open spaces continue to be attractive places to visit they will not serve as the intended foil to projected intensification elsewhere in London. The task force will need to explore all options to address this funding issue.*

### **Questions 17 and 18 Digital connectivity**

What else can we do to ensure we achieve universal digital connectivity?

Are you able to suggest examples of alternative ways of providing digital connectivity to local areas with poor or no broadband provision?

#### **Response**

*24. Digital telecommunications infrastructure needs to be provided and upgraded to offer universal coverage. This may need changes to the regulatory environment to incentivise ubiquitous rollout and will also require innovative design solutions to enable coverage in sensitive areas without adversely affecting their character. Provision of a universal network will then have to be complemented with suitable user packages to encourage take up of the digital services available. A particularly important issue for future economic growth is accessibility to reliable affordable broadband for small and medium enterprises. Such firms cannot always access digital services as cheaply as more mature and larger users. This*

*could be constraining their growth and that of the economy as a whole given the importance of SMEs to future growth potential. Market competition should address this issue but there needs to be effective regulatory powers to address market failures.*

### **Questions 19 and 20 Energy**

Do you agree with our approach in stimulating locally produced energy? If not, why?

What else should we consider to ensure London's energy supply is affordable, sustainable and secure?

### **Response**

*25. Locally produced energy should be encouraged because of its sustainability, resilience and security benefits. The mix of energy sources will vary across London with local circumstances. Higher density mixed use areas such as parts of central London are particularly well suited to combined heat and power schemes. The same high density characteristics such as overshadowing can sometimes make it harder for buildings in such areas to contribute wind or solar power. However technological change may bring new solutions and opportunities.*

### **Questions 22, 23 and 24 Waste**

Do you think the name 'circular economy' is best to describe the approach or will it confuse consumers and businesses? Can you suggest other names?

Do you agree with our proposed approach? If not, why?

How can we incentive businesses and households to reuse and recycle more?

### **Response**

*26. 'Recycling' is a well-known concept and would be more readily understood than using the generic term 'circular economy' to describe the intended approach to waste management. More consistent and thorough recycling services are essential yet a significant potential challenge is the resultant extra storage space needed by businesses and especially households. Local plan policies need to include space standards for storage and collection to enable more sustainable waste management to occur without adversely affecting quality of life or the public realm.*