



Sadiq Khan (Mayor of London)
New London Plan
GLA City Hall
London Plan Team
London
SE1 2AA

Date: 28 February 2018
Ref: CT/BMSPG

Dear Mr Khan

Berkshire Members Strategic Planning Group - Response to the New London Plan

I write on behalf of the Berkshire Members Strategic Planning Group, of which I am Chairman to respond on behalf of the Group to your consultation on the New London Plan.

The group was established to address shared issues around the planning and delivery of housing in Berkshire. Members of the Group are at different stages in the process of producing new Local Plans for their areas and are working together to plan effectively at a strategic level. Membership of the Group comprises the lead member for planning from each of the six Berkshire Unitary Authorities and a representative of the Thames Valley Berkshire Local Economic Partnership.

Please find below the Group's response to the current consultation on the draft New London Plan.

Growth

The Plan's aspiration that London should accommodate its growth needs within its boundaries is welcomed (paras 2.3.1 and 4.1.1). This is considered important in order to minimise the need for commuting and make the city as sustainable as possible. There are concerns about whether this will be achievable in practice, particularly bearing in mind the significant increase in delivery rates that would be required. It would be helpful if the Plan could be more detailed in setting out how the proposed rates will be delivered.

Green Belt

The Berkshire authorities recognise the importance the government attaches to the protection of the Green Belt. However in the context of a plan that does not propose to meet all its housing needs **it is not considered a sound approach** to seek the blanket protection of the Green Belt as proposed by Policy G2 in the absence of Green Belt review. The lack of a proper review of the Green Belt and the extent to which the land within it contributes to the purposes of the Green Belt means that this policy approach is not supported by any evidence. It is particularly inappropriate to adopt this approach when many planning authorities around London (including some of those in Berkshire) are undertaking such reviews and in some cases removing land from the Green Belt in order to meet their development needs.

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Housing

It is noted that the SHMA indicates a need for 66,000 homes per annum while the SHLAA indicates a capacity for 65,000 homes per annum. This represents a significant increase on current delivery rates and while a number of proposals are included in the Plan to increase densities and promote further development of smaller sites, further clarity should be provided on how this would work in practice. It would also be helpful to include consideration of how an increased gap would be dealt with if, for example, the government's proposed housing need methodology is imposed.

It would be helpful to this Group and others in the south-east if the Plan made it clear that London has the responsibility for resolving any unmet need from the SHMA. This is important to enable authorities outside London to plan properly for their own growth without having to deal with any perceived London overspill. This is critical in trying to defend planning appeals with regard to 5 year housing land supply and the additional 5% or 20% requirement arguments.

The Plan refers to the intention to seek 'willing partners' to accommodate more growth (para 2.3.5). While the emphasis on only 'willing' partners is welcomed, it is not clear from the Plan how this will work in practice. It does not specify the locations of these partners or which tier of local government they will be and what measures will be put in place to secure them. It would provide greater certainty and transparency if a call for 'willing partners' was carried out before the next version of the Plan is produced.

There is also a concern that the housing target is only for ten years with little indication of what will happen after that. Local Plans are normally expected to plan for at least 15 years of supply from the date of adoption. It would be helpful if further clarification could be provided on this, even if it is only in the form of strategic locations at this stage.

Economy/Employment Land

The recognition in Policy GG5 of the need to promote the strength and potential of the wider city region is welcomed and supported as are the proposals to plan for sufficient employment and industrial space to support economic development and regeneration.

The intention of Policy E7/F that LPAs' development plans should look at the potential to relocate industrial capacity to neighbouring authorities is noted. While the thrust of the policy is acceptable there is little evidence of the availability of receptor sites to take the displaced industrial capacity. Certainly in Berkshire, and probably across much of the Home Counties there is very little land available or suitable for such uses. Therefore while the principle of the policy is acceptable there is concern as to whether it will in fact be implementable.

Infrastructure

The Plan commitment to work with South East councils and other partners to secure mutual benefits on growth and infrastructure (para 2.0.5, Policy GG5/para 1.4.8) is welcomed. There is a significant infrastructure funding gap across London and the south-east which should be a shared priority to help secure economic prosperity.

The inclusion of the initial 13 Wider South East strategic transport infrastructure priorities is supported as is the recognition that these 13 transport priorities are needed to ensure existing growth plans can be delivered and address current shortfalls in transport provision.

The Plan should continue to be clear that Wider South East transport priorities are not being planned as corridors for extra growth from London. South East authorities' growth plans are for them to decide on and the London Plan should not seek to influence them unduly.

The Plan opposes the expansion of Heathrow if additional noise or air quality harm would result, and sets out that support for additional aviation capacity, including improved surface access (Policy T8). The Plan should emphasise the need for western and southern rail access to Heathrow **now**; they are already necessary to tackle existing transport and air quality problems, and should be implemented for the current two-runway configuration rather than as a by-product of expansion, should it happen.

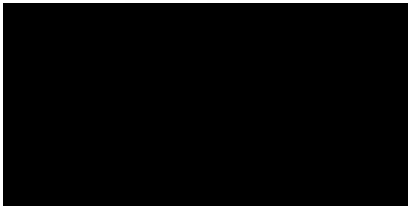
Waste

The Group strongly supports the intention that by 2026 London will cease to export household and commercial and industrial waste (Table 9.3).

There is also support for Policy S19 to safeguard existing waste sites. This will be important if waste capacity is to be maintained in the context of intense demand for development land.

I trust that due consideration will be given to the comments made above and that you will continue to engage in constructive dialogue with Councils and other organisations across the south-east as the Plan progresses through its further stages.

Yours sincerely



Cllr Chris Turrell
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Executive Member for Planning and Transport
Bracknell Forest Council