

# Buckinghamshire County Council comments

Page: [Chapter 1 Planning London's Future \(Good Growth Policies\)](#)

Section: [N/A](#)

Support the concept of six core 'Good Growth' principles that are "strategic objectives" of the Plan for delivering growth that is socially and economically inclusive and environmentally sustainable.

Page: [Introduction to Chapter 2](#)

Section: [N/A](#)

Support the police objective that all parts of London need to embrace and manage change and Outer London, where the suburban pattern of development has significant potential, has the opportunity for appropriate intensification over time, particularly for housing; the Opportunity Areas (OAs) to be clustered into strategic Growth Corridors; the Central Activity Zones (CAZs) and Town Centres, and for many the surrounding areas have potential to accommodate significant quantities of new housing as part of mixed-use development and integrating community and leisure activities and the Strategic and Local Regeneration Areas to be the focus for sustainable and inclusive regeneration.

Page: [Policy SD2 Collaboration in the Wider South East](#)

Section: [N/A](#)

The County Council acknowledges that there is need for collaboration with neighboring authorities for wider mutual benefits and support the Mayor's approach to working with "willing partners in the Wider South East" through non-statutory strategic structure, however, there has been little discussion and/or dialogue with the willing partners by the Mayor, at least not with Buckinghamshire County Council and we are willing to have a dialogue and explore how the GLA and BCC can working together across the boundaries.

Page: [Chapter 3 Design](#)

Section: [N/A](#)

There is general support for policies that encourage good design and good planning and development should be fit for purpose and respond to the changing needs of London and make the best use the city's finite supply of land. The efficient use of land requires optimisation of density.

Page: [Policy H1 Increasing housing supply](#)

Section: [N/A](#)

Welcomes the approach set out in the Plan to deliver housing and to meet the needs of the Londoners within the plan area, however the major concern is that Strategic Housing Land Availability Assessment is only able to identify land for the first ten years of the Plan, whilst the Plan covers a period of 22 years. How will the Mayor deliver a similar level of housing demand for the remaining 12 years of the Plan.

The Plan should also set out the consequences if housing delivery rates fail to increase the supply of housing and how the situation will be managed within London or would the Mayor be seeking support from further afield.

There is a need for greater clarity on how London would manage its own housing pressures, policies and delivery rates, local planning authorities outside London should not be pressurised or asked by Inspectors, to explain how they propose to address housing delivery shortfalls within London.

Housing delivery shortfalls within the capital should be a matter for London to deal with, perhaps by means of a review of the Plan or alterations to it. There may also be merit in the Plan to identify a trigger point for such a review or alterations – a specific number of years of failure, for example.

Page: [Policy H2 Small sites](#)

Section: [N/A](#)

The target for small sites is very ambitious as in previous London Plan reviews they have been unable to demonstrate the available capacity of small sites, however they provide an opportunity for early delivery. The County Council welcomes the approach, but the evidence needs to demonstrate that there are available sites to deliver this level of homes.

Page: [Policy H5 Delivering affordable housing](#)

Section: [N/A](#)

Also support and welcome the aspirations of the Plan to deliver affordable housing to meet the need of those who are unable to access market. If more affordable homes are delivered in London, this may reduce pressure for home in the County from household who move to the county for reason of affordability.

Welcome the aspirations to deliver more affordable in partnership with developer who enter into an agreement and development on public sector land. This is a positive direction of the Plan and BCC supports such policy and commitment

Page: [Policy H13 Build to Rent](#)

Section: [N/A](#)

BCC supports the policies setting out the policies on how the Plan will assist in the delivery of home “build for rent” that will also increase housing accommodation and ensure that they are affordable;

Page: [Policy H15 Specialist older persons housing](#)

Section: [N/A](#)

There is support for the delivery of specialist housing for the elderly and in setting a bench for the Boroughs for sheltered, extra-care and nursing care accommodation

Page: [Chapter 5 Social Infrastructure](#)

Section: [N/A](#)

Support the aspirations of the policy to deliver the level of appropriate social infrastructure to meet the needs of the communities.

Page: [Chapter 6 Economy](#)

Section: [N/A](#)

Support the protection for the industrial floorspace for the SIL and LSIS to ensure that there is no net loss and also support the policy seeking intensification of the employment areas with increased density to ensure better use is made of limited land resources and in providing flexible and affordable space for SMEs.

Support the policy for intensification and mixed-use in the Town centre to make best use of space and facilities in sustainable location with active day and night economies.

Page: [Chapter 7 Heritage and Culture](#)

Section: [N/A](#)

Support the aspirations of the policy to protect and enhance heritage and culture of the capital.

Page: [Policy G2 London's Green Belt](#)

Section: [N/A](#)

The County is constrained by the Green Belt and the Chilterns area of Outstanding Natural Beauty both of which provides essential green and open spaces as well as leisure and recreational opportunities for Buckinghamshire and large parts of London. BCC welcomes the Mayor's commitment to 'protecting and enhancing the environment – including the Green Belt and other designated green spaces' as well as the acknowledgement of the role that such areas play in the health and well-being of people.

Page: [Policy G6 Biodiversity and access to nature](#)

Section: [N/A](#)

Introducing a principle of “**environmental net gain**” into planning decisions where wider natural capital benefits will be assessed as part of the planning process;

The 25-year Environment Plan includes proposals to seek to embed a “*net environmental gain*” principle for housing and infrastructure development. It says that current policy is that the planning system should provide biodiversity net gains where possible, but adds: “*We will explore strengthening this requirement for planning authorities to ensure environmental net gains across their areas, and will consult on making this mandatory – including any exemptions that may be necessary*”.

The London Plan should be more strongly aligned with this aspiration

## 2) Using a “**natural capital**” approach to protecting and enhancing the environment

The Defra 25 year Plan describes how in the past “*our failure to understand the full value of the benefits offered by the environment and cultural heritage has seen us make poor choices.*” The Government’s aim is to address this by using a natural capital approach to protecting and enhancing the environment, by recognising tangible and non-tangible economic benefits. The Plan states:

*“When we give the environment its due regard as a natural asset – indeed a key contributor – to the overall economy, we will be more likely to give it the value it deserves to protect and enhance it”*

As part of the Plan the Government pledges to:

*“...set gold standards in protecting and growing natural capital – leading the world in using this approach as a tool in decision-making. We will take into account the often hidden additional benefits in every aspect of the environment for national wellbeing, health and economic prosperity,”*

The County Council is conscious that the London Mayor has just published a natural capital account for London

<https://www.london.gov.uk/what-we-do/environment/parks-green-spaces-and-biodiversity/green-infrastructure/natural-capital?source=vanityurl>

Although the above document is referenced in the London Plan I sense the principle of a natural capital approach as now being advocated in the Governments 25 years Environment plan could be given much greater weight and emphasis in the London Plan.

Page: [Policy SI2 Minimising greenhouse gas emissions](#)

Section: N/A

Support the positive to approach for more sustainable development that will reduce carbon emission and energy demand, increasing recycling and improve quality of life and access to green space.

Page: [Policy SI8 Waste capacity and net waste self sufficiency](#)

Section: N/A

London's waste planning authorities need to be more positive and strategic in facilitating delivery of the management capacity as emerging trends suggest that more waste than previously anticipated is to be exported to other WPAs; if this trend continues it could significantly impact on / displace capacity of other WPAs and the level to which they can achieve net self-sufficiency.

Page: [Policy T1 Strategic approach to transport](#)

Section: [N/A](#)

The County Council acknowledges that there is need for collaboration with neighboring authorities for wider mutual benefits and support the Mayor's approach to working with "willing partners in the Wider South East" through non-statutory strategic structure, however, there has been little discussion and/or dialogue with the willing partners by the Mayor, at least not with Buckinghamshire County Council and we are willing to have a dialogue and explore how the GLA and BCC can working together across the boundaries.

Page: [Policy T2 Healthy streets](#)

Section: [N/A](#)

Support and welcome the overall approach in the Plan built on the Transport Strategy that the Mayor consulted on in September 2017, with the emphasis on "Health Street Approach"; with the ambition to reducing use of private car and improving the environment that encourages public transport, walking and cycling.

Page: [Policy T2 Healthy streets](#)

Section: [N/A](#)

The County Council supports the overall approach for reducing travel by private car and improvement of the environment and public transport that encourages walking and cycling.

Page: [Policy T3 Transport capacity, connectivity and safeguarding](#)

Section: [N/A](#)

The County Council requests the Mayor to consider improvement to the Metropolitan Line serving the southern part of the county and Watford-extension to Watford junction station