

Draft London Plan:

Joint response of the Buckinghamshire District Councils and Buckinghamshire Thames Valley Local Enterprise Partnership

2 March 2018

Introduction

1. This response is submitted on behalf of the Buckinghamshire District Councils (Aylesbury Vale District Council, Chiltern District Council, South Bucks District Council and Wycombe District Council), and the Buckinghamshire Thames Valley Local Enterprise Partnership. Together we are working to drive positive change that will deliver sustainable development while ensuring that the local natural and built environment is protected and enhanced so that the places that make up Buckinghamshire retain a strong sense of identity. Where we are proposing a change to the Draft London Plan, this should be recorded as a formal objection as we would like the opportunity to participate at the Examination in Public in due course.
2. There are six inter-related strands to our response to the Draft London Plan.
 - We fully support the Mayor's ambition to achieve a step-change in housing delivery in London. (Draft London Plan Policy GG4)
 - The London Plan should fully close the gap between the number of homes needed and the supply of land to accommodate them by further exploring and exhausting all reasonable options for accommodating housing growth within London. One such option is a comprehensive and fully justified review of the Green Belt within London. (Draft London Plan Policy H1 and Integrated Impact Assessment)
 - The London Plan should include a policy or policies which demonstrate how London's housing need will be accommodated beyond the first 10 years of the Plan period. (Draft London Plan Policy H1)
 - We welcome the London Plan emphasis on willing partners for housing and/or economic growth in the wider South East and beyond, but the Plan should set out how the policies will be implemented. The London Plan should also include a clear and unambiguous policy commitment that, in the event the Mayor is not able to enter into partnerships that will deliver sufficient and timely growth to accommodate any shortfall between London's development needs and development capacity to 2039, then the whole of the shortfall will be provided for within the Capital. (Draft London Plan Policies SD2 & SD3)
 - We welcome inclusion in the Plan of the 13 Strategic Infrastructure Priorities endorsed by the wider South East partners for initial delivery. (Figure 2.15)
 - The Plan should include a commitment to collaborative working on a wider range of issues, including expansion at Heathrow Airport (Draft London Plan Policies T8 & SD2) and the All London Green Grid. (Policy SD2)

Housing and Green Belt

3. We understand, welcome and support the Mayor's ambition to achieve a step-change in housing delivery in London, including affordable housing, in order to meet as much as possible of the needs of London's growing population within the Capital's boundaries. In order to provide longer-term certainty within and beyond the Capital, the London Plan should close fully the gap between the number of homes needed (66,000 a year for at least 20 years) and the supply of land to accommodate them (65,000 a year for the first 10 years of the Plan) by further exploring and exhausting all reasonable options for accommodating housing growth within London.
4. One such option is a comprehensive and fully justified review of the Green Belt within London. Given the planned shortfall between housing need and supply in London over the next 10 years and the Plan's acknowledged uncertainty about London's longer-term approach to housing capacity, it is not acceptable that the London Plan has failed to explore in full what scope there might be to release Green Belt in sustainable locations within London in order to accommodate housing and employment needs.
5. We note the Integrated Impact Assessment (IIA) Consultation Document (November 2017) that accompanies the Draft London Plan includes a number of different strategic options which are compared in terms of their performance against 24 overall objectives relating to the environment, equality and diversity, health and community safety. The preferred strategic options have been chosen based on the IIA. 'Making the best use of land' is one of six themes that the IIA identifies as being important for London. We agree that this should be a key objective of the London Plan.
6. One of the strategic options to deliver this theme is 'Current London Plan and selective Green Belt release' (IIA Option 4 – paragraph 8.2.3). It would involve a continuation of the objectives in the current London Plan with the addition of limited Green Belt release in sustainable locations to accommodate identified housing and employment needs over the Plan period. Any Green Belt releases would be determined through the local plan process and would prioritise previously developed land and poorly performing Green Belt. The appraisal concludes that the option could/would have a range of positive impacts:

'The sustainable release of Green Belt land can bring a range of local economic benefits, helping to meet local demands and contribute to service and infrastructure provision. The release of land around commuter hubs could help to maximise and enhance strategic public transport infrastructure, underpinning sustainable growth. Green Belt release in sustainable locations and areas of high PTAL could encourage inclusive growth Increased public transport would contribute to improvements in air quality Associated traffic noise would also decline

This option also promotes the delivery of employment and housing land which will benefit businesses and residents alike and could play a role in strengthening the long-term competitiveness of London'.

7. The IIA also considers Green Belt release in terms of environmental impacts, namely species and habitats, flooding, air quality, historic environment and geodiversity. With the exception of geodiversity (effects positive/unknown) and historic environment (effects unknown/minor negative), the significance of the environmental effects is assessed as minor negative/unknown. Minor negative effects are likely to be limited to small areas within London or limited to small groups of people. This evidence does not appear to support the IIA recommendation *'that an alternative to Green Belt release is considered due to the **severe** environmental damage it could have'* (our emphasis) or the GLA response to this element of the IIA which rejects selective Green Belt release in order to protect the environmental and social benefits (for example, activities that support health and well-being) of the Green Belt.
8. The IIA itself clearly demonstrates that selective release of Green Belt in London has the potential to deliver sustainable growth. It should therefore be given further consideration as part of the London Plan's preferred 'Sustainable Intensification' option.
9. We agree that the Green Belt is fundamentally important. The National Planning Policy Framework (NPPF) is very clear that once established, Green Belt boundaries should only be altered in exceptional circumstances and National Planning Policy Guidance (NPPG) has clarified how Green Belt may affect the ability of an area to meet housing need. However, this does not and should not rule out a comprehensive Green Belt assessment as part of the evidence base to underpin the London Plan. Crucially such an assessment would allow consideration of how areas of the Green Belt within London perform in terms of the five purposes for the Green Belt set out in the NPPF and whether exceptional circumstances may exist that would justify the alteration of Green Belt boundaries.
10. We understand that development in the Green Belt can raise significant concerns in local communities and that any changes to Green Belt boundaries must be fully justified. Nevertheless Green Belt release is an option that all of the Buckinghamshire Districts are considering in their emerging local plans, as are local authorities in neighbouring Bedfordshire, Berkshire and Oxfordshire. Given the gap between the number of homes needed and the supply of land to accommodate them within the Capital, the London Plan should do likewise, and consider Green Belt review as part of the preferred Sustainable Intensification option.
11. Consideration of selective Green Belt release is particularly important given the Draft Plan's failure to provide any detailed housing targets beyond 2029. London's own evidence on housing need relates to a 20-year period and the Draft Plan runs from 2019 to 2041. 2041 has been chosen *'... to provide a longer-term view of London's development to inform decision making'*. The Draft Plan explains that the decision to set housing targets for the first 10 years only reflects the dynamic nature of London's housing market. It also means there will need to be a review of the housing targets well before 2029. We understand that strategic planning is inherently uncertain. This is why delivery against policy targets is monitored and policies are kept under review and, where necessary, rolled forward. The Plan represents the first full review of the land use and growth strategy for the Capital since 2011 and provides the framework to address the key planning issues facing London, including infrastructure planning which often has a long time horizon, and the longer-term

needs of the economy. The South East and London are the drivers of the national economy and consistently deliver the largest net financial returns to the Treasury. This success is in part due to the strong interdependencies between London and the wider South East. In order to provide longer-term certainty within and beyond the Capital, the London Plan should include a policy (or policies) which demonstrate how London's housing needs will be accommodated beyond the first 10 years of the Plan period. Policy H1 should be amended to include targets for net housing completions to 2039.

Collaboration with the Wider South East

12. Aylesbury Vale DC, Chiltern DC, South Bucks DC, Wycombe DC and Bucks Thames Valley LEP have reached agreement as to how Buckinghamshire's housing and employment needs will be accommodated in local plans in the county up to 2033. Evidence shows that housing need originating in Chiltern, South Bucks and Wycombe Districts will exceed their capacity due to constraints including Green Belt and AONB. The unmet housing need originating in southern Buckinghamshire will be provided for in the Vale of Aylesbury Local Plan. Linked to this, there will be a redistribution of economic growth from the three southern districts to Aylesbury Vale District. The level of housing growth that Aylesbury Vale DC is expecting to deliver to 2033 is ambitious but achievable. Aylesbury Vale is already delivering large numbers of homes into the market; its new housing supply outperformed all other authorities in the Cambridge – Milton Keynes – Oxford Corridor between 2011 and 2015. To build upon this track record and deliver homes at the rates required to meet Buckinghamshire's needs amounts to a step-change in housing delivery in Aylesbury Vale and will require a large number of actions to be taken by a range of different partners. It means that there will be no scope to meet the development needs of London within Buckinghamshire.
13. We welcome the London Plan emphasis on joint working between the Mayor and willing partners for housing and/or economic growth in the wider South East and beyond, where investment in strategic infrastructure has the potential to support development and secure mutual benefits for London and the partner(s) concerned. Though the Draft Plan acknowledges the strategic and longer-term nature of such partnerships, including investment in public transport and the likely need to secure infrastructure funding to unlock opportunities, no specific partnerships are referenced in the Draft Plan. Nor does the Draft Plan explain how the 'willing partner' process will work in practice. Further detail is required in the text supporting Policy SD3 in order to avoid creating uncertainty in the wider South East and to avoid unnecessary risks for London's future success. The Plan should also include a clear and unambiguous policy commitment that in the event the Mayor is not able to enter into partnerships that will deliver sufficient and timely growth to accommodate any shortfall between London's development needs and development capacity to 2039, then the whole of the shortfall will be provided for within the Capital.

14. The inclusion of the 13 Initial Strategic Infrastructure Priorities endorsed by the grouping of wider South East partners is welcome. The text accompanying Figure 2.15 should clarify that the list of 13 priorities may evolve over the life-time of the Plan as existing schemes such as the Cambridge – Milton Keynes – Oxford corridor progress and/or new priorities emerge, including connectivity to London, Heathrow and Old Oak Common. We welcome the recognition that any additional growth opportunities unlocked by the infrastructure investment may be required to meet South East demands, rather than those from London. Capacity and the scope for additional development vary locally within the South East and it is rightly a matter for local leadership to determine how to meet needs in a sustainable manner.
15. We welcome the statement in Policy SD2 (E) that the Mayor will work with relevant wider South East partners to find solutions to shared strategic concerns. Although the list of issues in (E) is not intended to be exhaustive there are a number of important omissions. These include the All London Green Grid (Colne Valley Regional Park) and Heathrow Airport. In both cases the relevant authorities include those in Buckinghamshire. We note that the Draft Plan restates the Mayor's opposition to any expansion at Heathrow Airport that would result in additional harm in terms of noise or air quality but that he supports additional aviation capacity including improved surface access (Policy T8 [D & E respectively]). Policy T8 should make specific reference to the importance of early delivery of western and southern rail access to Heathrow and the supporting text should refer to collaborative working between the Mayor and relevant authorities and LEPs in the South East. These commitments to collaborative working would be useful additions to the London Plan and in the spirit of the Draft Plan's other statements about partnership working with relevant wider South East partners to secure mutual benefits.