

Strategic Plan Partnership Team

Central Bedfordshire Council
Priory House
Monk's Walk
Chicksands
Shefford
SG17 5TQ

Your ref:

Our ref:

Draft London Plan

Date:

02/03/2018

Dear Sir/Madam

Central Bedfordshire Response to the Draft London Plan Consultation

Thank you for consulting Central Bedfordshire Council (CBC), we welcome the opportunity to comment on the Draft London Plan. Overall, the Council is supportive of the Draft London Plan and its commitment to meet much of London's identified housing needs within the Greater London administrative area. However, we do have some concerns regarding uncertainties arising from housing provision which are set out below. We hope you will find these comments helpful and supportive.

Housing need and supply

The Draft Plan identifies a housing need of approximately 66,000 additional homes a year within London. However, the supporting Strategic Housing Land Availability Assessment suggests that London only has capacity for approximately 65,000 additional homes a year. This results in a deficit of 1,000 homes a year which are unaccounted for in the Draft Plan. Whilst we welcome the commitment set out in the Draft Plan that states "...as far as possible sufficient provision will be made to accommodate the projected growth within London...", we are concerned that the Draft Plan doesn't specifically acknowledge this shortfall, nor does it set out how this will be addressed. Under delivery against London Plan targets has been an ongoing issue in recent years, with no apparent solution to the acknowledged deficit identified. On this basis, we suggest the Draft Plan is amended firstly to clarify how the 1,000 homes per year deficit will be accommodated, and secondly what contingencies have been identified should the housing target not be met, and subsequently how any resulting unmet needs will be addressed.

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Policy SD3: Collaboration in the Wider South East

We welcome the acknowledgement that the effects of London’s housing and labour markets and their related multiplier effects extend far beyond its administrative boundaries, and the commitment to work with Wider South-East partners to find solutions to shared strategic concerns. As you know Central Bedfordshire is already one of the most highly connected areas, and given its unique location in the centre of the Oxford-Cambridge Arc, there are a number of key opportunities that Central Bedfordshire is positioned to take full advantage of; including the proposed East West Rail Link (EWR), the Cambridge-Milton Keynes-Oxford Arc and associated high tech employment led growth. We therefore strongly welcome the reference to East West Rail and new Expressway road link (Oxford - Cambridge) in your list of strategic infrastructure priorities.

However, we have concerns regarding the housing deficit identified above, and how this issue will be addressed. On this point, the Plan states that “given the pressure for growth in both London and the Wider South East, the barriers to housing delivery that need to be overcome to avoid a further increase of the backlog, and potential changes to projections over time, it is prudent to plan for longer-term contingencies. Therefore, the Mayor is interested in working with willing partners beyond London to explore if there is potential to accommodate more growth in sustainable locations outside the capital.” This suggests the Plan may be placing reliance on “willing” authorities beyond London to meet its unmet housing needs, though it is not explicit in saying this. Indeed, the reference to “longer term contingencies” suggests that this may refer to the period post-2029. Whilst we welcome the commitment to informal partnership working, we seek clarification concerning what the Plan’s intentions are in relation to this section of the Plan, specifically whether the measures – for example is it accommodate unmet needs arising now, or post 2029 - and the redrafting of this policy and supporting text to reflect this.

With respect to partnership working, we would expect positive engagement to include discussions and commitments on infrastructure provision beyond simply mitigating the very local impact of the development. To this end we would like to see a commitment in the Draft Plan that willing partners that accept London growth can expect an enhanced level of investment in key infrastructure beyond the usual local mitigation – be it significant upgrades to our railway stations that serve London, or road routes into the capital, investment in local hospitals and open spaces etc.

We suggest that if the Draft London Plan expects peripheral authorities to accommodate London’s unmet need then it needs to be explicit about this, and work proactively with Councils to ensure that the implications of its growth and development plans are fully considered in current Plans and/or planned Local Plan reviews.

Green Belt

Paragraph 2.3.1 states that that Plan “aims to accommodate all of London’s growth within its boundaries without intruding on its Green Belt”. Whilst the Central Bedfordshire Council support the protection of the London Green Belt where appropriate, given that there is an identified unmet need of 1,000 homes a year throughout the Plan period, a review should be undertaken to identify whether there is any potential to release and London Green Belt before potentially seeking assistance from peripheral authorities to help meet that unmet need. This is particularly important given that many of those authorities may also have Green Belt, and may already be seeking to release Green Belt land to accommodate their own growth requirements. We believe that the Mayor should do more to ensure that all development options are considered to meet London’s own needs within its boundaries, including a review of its Green Belt, and encouraging reuse of commercial land where appropriate.

Minerals and Waste

- We welcome and strongly support the overall strategy for minerals and waste, in particular:
- The provision for safeguarding aggregate wharves and railheads (Policies T7, SI10 and SI15);
- The emphasis on recycled aggregates, whilst at the same time seeking to maintain aggregate landbanks (Policy SI10);
- The safeguarding of aggregate resources (Policy SI10)
- The reduction and minimisation of waste, aiming at a circular economy (Policy S17);
- Waste self-sufficiency by 2026 (Policy SI8);
- The safeguarding of waste management sites (Policy SI9);
- The ‘Agent of Change’ principle (Policy D12) which will assist in safeguarding existing mineral and waste sites.

I hope you have found the above comments and observations helpful. Please do not hesitate to contact me if you wish to discuss the above further.

Yours faithfully

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