

## **Chelmsford City Council's response to the draft London Plan**

1. These responses have been agreed by the Chairman and Vice-Chairman of Chelmsford City Council's Development Policy Committee and the Director of Sustainable Communities.

### **General comments**

2. Chelmsford City Council (CCC) welcomes the opportunity to comment on the draft London Plan to help influence the emerging document and monitor the key cross-boundary and strategic issues that affect CCC's administrative area.
3. CCC welcomes the concept of Good Growth that underpins the Plan and the ambitious approach the Plan is taking to try and address the continuing growth of London in a sustainable manner. As a whole, the Plan is proactive, comprehensive and challenging. However, CCC has concerns on some key issues.

### **Housing numbers and meeting need**

4. The Plans states that it aims to accommodate all of London's growth within its boundaries such that as far as possible sufficient provision will be made to accommodate the projected growth within London. However, this appears to be caveated by the interest expressed in working with 'willing partners beyond London to explore if there is potential to accommodate more growth in sustainable locations outside the capital' as set out in the supporting text of Policy SD3 of the Plan.
5. The GLA Strategic Housing Market Assessment identifies that London has a need for approximately 66,000 additional homes a year over the Plan period. The Plan makes provision and has specific policies and targets to deliver 65,000dpa. The proposed annual housing target is, therefore, 1,000 dwellings less per year than the identified housing need for London. However, there is no robust reasoning for this shortfall and there is no explanation on how the shortfall will be addressed.
6. Paragraph 47 of the NPPF requires local planning authorities to meet their full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the Framework. Justification needs to be given regarding the shortfall on delivering London's FOAN and there should be clear provisions and mechanisms to meet deficiencies over the Plan period.
7. The Plan contains an ambitious 10 year housing completions target period of 2019/20-2028/29. Whilst it is acknowledged that targets are only set for this period due to the dynamic nature of London's land market, some indication should be given on the expectations of housing delivery in the latter half of the

Plan period and whether the same ambitious targets are expected to be sustained for the next 10 years.

8. On the 10 year housing target, whilst windfall sites are not specifically included, there is still a reliance on them in achieving the target through windfall assumptions that are higher than past trends due to the introduction of a new presumption in favour of small sites (Policy H2). This policy and presumption is yet to be tested and therefore it is questioned whether Boroughs should be encouraged to use these assumptions in their 5 yr housing trajectories.
9. In addition, the Plan has averaged need over 25 years, which amounts to 66,000pa. But if one looks at the need for the period 2016-2029, it appears that housing need is higher. CCC is aware that clarification on this matter has previously been sought by East of England Local Government Association – a response is yet to be received.
10. Whilst CCC supports the Plan's ambitious approach, delivery will be challenging – London's past delivery trends are evident of this – and therefore it is considered that the possibility of failure is addressed in the Plan. Whilst monitoring and key performance indicator strategies and policies are specified, the Plan is not as clear as it should be in terms of what would happen were failure to materialise.
11. CCC is concerned that the ambitiousness of the Plan, the shortfall in housing delivery against need, the lack of provision/recognition of possible failure and the Plan's interest in working with willing partners indicates that there may be a future expectation that authorities outside of London boundaries accommodate London's unmet housing need.
12. As part of the process of identifying the OAN for the Mid and North Essex HMA, the joint OAHN Assessment 2016 has considered London's Housing need assessing both the GLA Central Scenario and the SNPP. The differences of the migration projections from London into the HMA from these two approaches are very similar.
13. CCC welcomes the opportunity for cross-boundary working with London and other Wider South East (WSE) partners, as set out in Policy SD3, to support housing and business development and to realise the potential of the wider region. However, the supporting text of the policy seems to suggest that the primary focus is finding 'willing partners beyond London to explore if there is potential to accommodate more growth in sustainable locations outside capital'. As stated above, CCC does not believe there is a need, nor are in a position, to accommodate any of London's unmet need.

#### **Gypsy and Traveller accommodation**

14. At paragraph 4.16.2 of the Plan, it is noted that the Mayor has adopted a new definition of Gypsies and Travellers which is different to the Government. It is

questioned whether all the London Boroughs have agreed to this new definition and whether they are obliged to adopt it when assessing need for Gypsy and Traveller accommodation.

15. Paragraph 4.16.7 of the Plan states that Boroughs should actively plan for Gypsies and Travellers' accommodation needs. The Plan does not clarify the position if need cannot be met and what steps should be taken by Boroughs to address unmet need.

### **The Economy**

16. CCC welcomes the Plan's positive approach to supporting the projected growth of all sectors of London's economy.
17. It is noted that in respect to industrial land, Policy E7 encourages Boroughs to consider, in addition to intensification and co-location, the substitution of some of London's industrial capacity elsewhere in London and beyond London's boundary. This is subject to it being mutually advantageous and full regard being given to the positive and negative impacts of substitution.
18. CCC welcomes the investment of high quality employers who will positively contribute to the Borough's economy. However, the Plan is unclear on what industrial uses it considers may be more appropriately located outside of London so authorities in the WSE can understand what collaboration opportunities may be available. Also, it is questioned whether substitution arrangements will place additional pressure on WSE authorities to increase housing supply to meet job demand not previously identified in Objectively Assessed Need Assessments.

### **Transport**

19. The Plan's ambition to create a transport network that is sustainable and able to provide for its growing population is welcomed.
20. CCC supports the Plan's Transport Strategy to develop effective transport policies and projects to support the sustainable development of London and the Wider South East as well as to support better national and international public transport connections.

### **Waste management**

21. CCC is aware that the Essex County Council Minerals and Waste and the East and England Waste Technical Advisory Body have provided detailed comments on the draft London Plan raising questions, amongst other matters, on the ambitious waste targets to reduce exports. The Council's supports the delivery of these targets, which will be subject to pressure from significant levels of new housing, as a priority and the commitment of the Plan for Boroughs to meet recycling targets.