

DRAFT LONDON PLAN (DECEMBER 2017) – RESPONSE BY DARTFORD BOROUGH COUNCIL

<i>Draft London Plan content</i>	<i>Dartford Borough Council's position</i>	<i>Further notes</i>
Policy SD2	COMMENT	<p>The principle of featuring a policy on collaboration is welcomed; however greater clarity is required on how important parts of SD2 will be applied.</p> <p>To ensure joint working continues to progress, and the relationship remains positive, confirmation is required that the Mayor's officers will only comment judiciously and with restraint; it is unlikely that any individual Local Plan will have a significant impact on plan delivery and the strategic planning of London.</p> <p>The Mayor should set out how he will sensitively implement the aim of the policy for "consistent technical evidence", with paragraph 2.2.9 highlighting that the GLA have created demographic projections for LPAs nationally . This part of the policy creates a conflict with national policy for LPAs outside London, and will be ineffective, as Inspectors for these plans will have to either set aside the GLA's approach or the government's approach. It is not appropriate to require setting aside national guidance.</p>
Policy SD3	COMMENT	<p>Most of the policy intent is now set out in supporting text in this version of the draft Plan. Recognition of joint working and exploring potential mutual benefits is welcome, and the series of 13 initial strategic infrastructure priorities are noted, with in principle support for route upgrades through Kent.</p> <p>Figure 2.15: Dartford Borough Council contends that corridors radiating in/ out of London should not be identified without appropriate explanation of the relationship between the Mayor's role in helping deliver infrastructure and his position on the role of growth in the wider South East vis-à-vis the shortfall in housing supply in Greater London over the plan period.</p> <p>The Mayor should not expect the Borough to accommodate additional growth from London without making a major capital contribution to the Crossrail extension and other necessary infrastructure. There is significantly less scope for developer contributions (whether via S106 or CIL) and from land values outside London, particularly in north Kent. The level of CIL which is viable within Dartford is a fraction of what is necessary to meet essential infrastructure requirements for schools and health facilities.</p>
Policy H2	OBJECT	<p>The Mayor's officers previously briefed Wider South East LPAs that there would be a notable shortfall in housing supply in London against need. This shortfall has been reduced in the draft London Plan; but a shortfall remains and the post 2029 London housing supply position is unclear.</p>

		<p>LPAs elsewhere will be looking beyond 2029, and moreover the Wider South East has a legitimate interest in ensuring that planned London housing delivery to 2029 is effective and will be delivered.</p> <p>Therefore Dartford is concerned over the prescriptive approach of the draft London Plan, particularly in relation to the rigid requirements and specifications on the delivery from small sites. Individual London Boroughs should be given local determination to explore the locally appropriate pattern of sustainable development to meet growth targets. This is heavily restricted by the London Plan, with increased likelihood of London failing to meet its overall housing target, with regional and national knock on consequences.</p> <p>Firstly, H2 should not go so far as to enforce a presumption in favour of small sites. Potential consequences in terms of impact on character – and especially the lack of on-site infrastructure on small sites – will be felt beyond individual Borough boundaries. The ability to deliver infrastructure, such as school and medical facilities, is greatly reduced in circumstances of cumulative growth from many small sites. This is due to both the economics of development as well as lack of opportunities to provide sites for these facilities. We disagree with paragraph 3.6.2 of the Plan. Here it takes the view that impacts will typically only be incremental, to be addressed through local Infrastructure Delivery Plans; and that it will not normally be necessary to refuse permission on infrastructure capacity grounds.</p> <p>In Dartford, there is already evidence of pressure on local schools adjoining the Bexley boundary because of inadequate provision within Bexley and the small sites approach is likely to exacerbate this. Furthermore, this approach is likely to conflict with the Mayor’s objective of protecting the Green Belt , with pressure being exerted to build school and health facilities on this land, given likely lack of alternatives.</p> <p>Secondly, specific issues arise with Table 4.2’s “targets” and H2. The robustness, suitability, implementation and relationship with operation of policy H1/ H2 and wider strategy, of the small sites figures needs to be explained. In the example of Bexley, 69% of total growth (H1) will need to occur at the stipulated infill/ residential intensification etc small sites. If enforced, this risks under delivery of housing and Bexley’s Growth Strategy which is a prime means of delivering the Elizabeth line extension sought by the draft London Plan.</p>
Policy G2	COMMENT	<p>The need for appropriate protection of the metropolitan Green Belt, both within and outside Greater London is recognised by Dartford Borough Council. In places, such as the Cray and Darent Valleys adjoining the Thames Estuary, any relaxation would lead to unsustainable urban coalescence.</p> <p>However, a London Plan which is rigid and does not allow for flexibility at the local Borough level to provide for sustainable development in the</p>

		<p>most appropriate way risks an increase of development pressure on the metropolitan Green Belt as a whole. In this context, there is concern about Policy G2, which allows for no flexibility for the de-designation of Green Belt by London Boroughs at the Local Plan-making stage and supports extension of the Green Belt. It introduces a very different level of protection of the Green Belt within London to that which will apply to Green Belt outside the Greater London boundary; despite all being the same metropolitan Green Belt. This is inequitable. On this strategic issue there should be consistency and fairness (between Greater London and outside) over the policy that applies when Local Plans are reviewed. The policy is in conflict with the NPPF which requires authorities to consider their Green Belt boundaries at the plan-making stage.</p>
Policy T3	SUPPORT	<p>Recognition in the London Plan of the need for significant transport upgrades along the southern side of the Thames from London to Kent is welcome. The “priority” given in the policy to new metropolitan rail lines, including the Elizabeth Line eastwards to Ebbsfleet, is welcome. As noted above on cross-boundary work, this is contingent on satisfactory explanation of the Mayor’s role in directly helping deliver infrastructure.</p>