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Borough Council
... bridging the communities ...

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1st March 2018

SENT VIA EMAIL

Dear Mr Mayor,

Elmbridge Borough Council Response to the Draft London Plan 2019 – 2041 Consultation

Elmbridge Borough Council welcomes the opportunity to comment on the draft London Plan 2019 – 2041. As a neighbouring borough, the Council is particularly interested in those cross-boundary strategic planning issues that could have implications for the Borough and for its own Local Plan preparation as well as how the benefits of growth and development in London could be shared with other local authorities.

Having reviewed the new London Plan, the Council would like to convey its general support for the draft plan and policies. The Council welcomes the concept of 'Good Growth', which the Mayor defines as growth that is socially and economically inclusive and environmentally sustainable (cross-cutting policies). Responding to the consultation in further detail, the Council has provided comments under the following headings:

- calculating housing need and taking account of the Government's proposed standard methodology;
- the identification of sub-housing market areas in London and how individual targets within London have been set;
- the delivery of the housing target;
- the type of homes to be delivered;
- the Metropolitan Green Belt; and
- duty to co-operate regarding cross boundary and strategic issues relating to the London Plan.

Calculating housing need

The draft London Plan sets out an overall target of 66,000 new homes every year for a 10-year period between 2019/20 and 2028/29. The Council welcomes the increase proposed from the current target of 49,000 as set out in the Further Alterations to the London Plan (FALP) (2015).

Regarding the Government's proposed standard methodology for calculating the number of homes required (Planning for the right homes in the right places, September 2017), the Council is aware that if this were applied circ. 72,000 homes should be provided across London per annum. The Council understands that the GLA's figure of 66,000 new homes is based on its own projections which differ slightly due to the longer time periods and trends data used by the GLA. It is also understood that this approach has been used to inform the preparation of previous London Plans (and amendments) and agreed at successive Examinations in Public.

Based on the above, the Council supports the identified housing need for London of 66,000 homes per annum. Nevertheless, in doing so the Council calls on the Mayor to support other Local Planning Authorities (LPA) outside of London should they also choose to deviate from the proposed standard methodology, using the same approach as the GLA as part of their own individual Local Plan preparation.

Sub- market housing areas and the setting of individual targets within London

The Council appreciates the acknowledgement of the series of complex and interlinked sub-markets (paragraph 4.1.2 of the draft London Plan) and the opportunity that exists within London to plan strategically, setting individual targets within London based on opportunities for development and the sustainability of locations.

The GLA's policy push to expect Outer London Authorities to deliver an increase in housing is also generally welcomed. This is a shift from previous London Plans that sought a continued reliance on Inner London to deliver the homes Londoners require. As set out in the Council's response to the FALP, this has been a key issue for those authorities outside of London and particularly in those areas on the fringe of the GLA area, as any under-delivery has tended to place increased pressure on housing delivery in our areas.

The realistic nature of whether such housing targets can be achieved

As set out above, the Council welcomes the proposed increase in housing targets across London and the bridging of the gap of un-met housing need. In supporting this approach, the Council acknowledges that to deliver the increase in homes, a shift in delivery will be required for example, increased densities and the delivery of more smaller sites. The Council also understands that this approach will require increased funding and investment from Government particularly in terms of infrastructure.

In supporting the call for increased funding and investment into London, the Council requests that the Mayor considers how any improvements can benefit authorities outside London, acknowledging that infrastructure is a key-cross boundary issue.

The types of homes to be delivered

It is clear to the Council that to increase housing delivery within London, the draft Plan is pushing to increase densities on most sites, principally those in key locations such as transport hubs and in town centres. This is mostly evident through the introduction of a small sites target for each London Borough.

Whilst the concept of optimising densities is supported in principle, the Council is concerned as to the type of homes that will be delivered because of this approach. The focus on higher density development across London and, within the Opportunity Areas in particular, is likely to only yield high-rise development of 1 and 2-bedroom units. The London Strategic Housing

Market Assessment (2017) identifies smaller units as the predominate need however, 29% of London's housing need does consist of family sized homes (3 and 4+ bedrooms).

By continuing to focus on increasing densities and thus the delivery of predominately smaller units, this approach fails to provide for the varying types of homes required. Inevitably this will lead to increased out-ward migration from London into neighbouring boroughs and districts putting significant pressure not only on their need to deliver more homes but also the supporting infrastructure required to support such growth. This includes schools, public services such as Health Centre and, in particular road and railway infrastructure for which, there is already some deficit.

The Metropolitan Green Belt

The Council notes that throughout the draft London Plan there is the presumption in favour of building on previously developed land and that the continued protection of Green Belt, Metropolitan Open Land (MOL) and other open land is strongly advocated (Policies H1, G2 and G3). However, the Mayor's approach does not recognise that in practice that several outer London Boroughs and local authorities on the London-Fringe covered by the wider Metropolitan Green Belt are already undertaking reviews of the Green Belt, in accordance with National Planning Guidance and the requirement to meet identified objectively assessed need.

The Council is concerned that without the benefit of a wider-strategic approach, local authorities within the South East are applying various approaches and methodologies to Green Belt reviews. This ad hoc approach is leading to inconsistent proposal for Green Belt release/protection and piecemeal release which may undermine the integrity of the wider Metropolitan Green Belt and prevent development taking place in the most sustainable locations away from Green Belt areas where its integrity is most vulnerable.

The Council is also seeking clarification on how Crossrail 2 South, the Kingston Opportunity Area (Policy SD1) and the proposed 9,000 homes in Chessington will be delivered. It is not clear how these can be achieved without potential releases of Green Belt land. Given the proximity of Chessington to our Borough Boundary it is necessary to consider the Mayor's longer-term plans for this part of London as part of the preparation of our current Local Plan.

Duty to Co-operate

Throughout the original London Plan and the FALP, the need for a partnership approach to plan-making and addressing the key strategic issues, both by the Mayor and individual London Boroughs, was clearly stated. This has continued through to the new draft London Plan with a specific policy focusing on collaboration in the Wider South East (Policy SD2).

As a local authority immediately adjoining the Greater London boundary, it is extremely important that this Council continues to be informed of the continued development of the new London Plan. In particular, the proposed Kingston Opportunity Area.
However, relating back to the Mayor's own comments regarding the series of complex and interlinked sub-markets, the Mayor must acknowledge and recognise the findings of the Kingston & North-East Surrey SHMA (2016). That is that Kingston-upon-Thames falls within a sub-housing market area that includes the Surrey Authorities of Elmbridge Borough Council, Epsom & Ewell Borough Council and Mole Valley District Council.

On this basis, the Council strongly disagrees with the Mayor's statement that because of London's ability to plan strategically, boroughs are not required to carry out their own housing

needs assessment but must plan for, and seek to deliver, the housing targets in the Plan. This ignores the biggest cross-boundary strategic planning issue that there is.

Kingston is part of the Kingston and North-East Surrey HMA and the Mayor is required to acknowledge this under the duty to cooperate. It is therefore strongly suggested that any housing delivery over the housing target for Kingston, as set out in the London Plan, is equally apportioned to London and the remainder of the Kingston & North-East Surrey HMA. This would also include a proportion of any housing delivery provided through the Opportunity Areas. Such an approach would recognise the linkages between are areas, emphasising and truly embracing the duty. It is considered that the Planning Inspector would recognise the benefits of such an approach and the logic and pragmatism behind it and would expect this to be fully explored through a Statement of Common Ground with the HMA authorities.

Prior to any further deliberations on housing targets and amended policies following this consultation, the Council kindly requests an opportunity to discuss this proposal.

Conclusions

Whilst the Council welcomes the proposed increase in the London housing target, concern remain as to the type of homes that will be delivered and the pressure this could place on authorities outside of London to provide more family homes. The Council would also welcome clarification on the Mayor's longer-term approach to the wider Metropolitan Green Belt beyond the London Plan period (2028/29).

We look forward to any further iterations of the plan and would welcome further co-operation regarding the proposals for Kingston in terms of the Opportunity Area and also the mutual benefits of any over delivery in their housing target.

Please contact our Head of Planning Services Kim Tagliarini (01372 474702 / KTagliarini@elmbridge.gov.uk) if you have any queries on the points raised in our response.

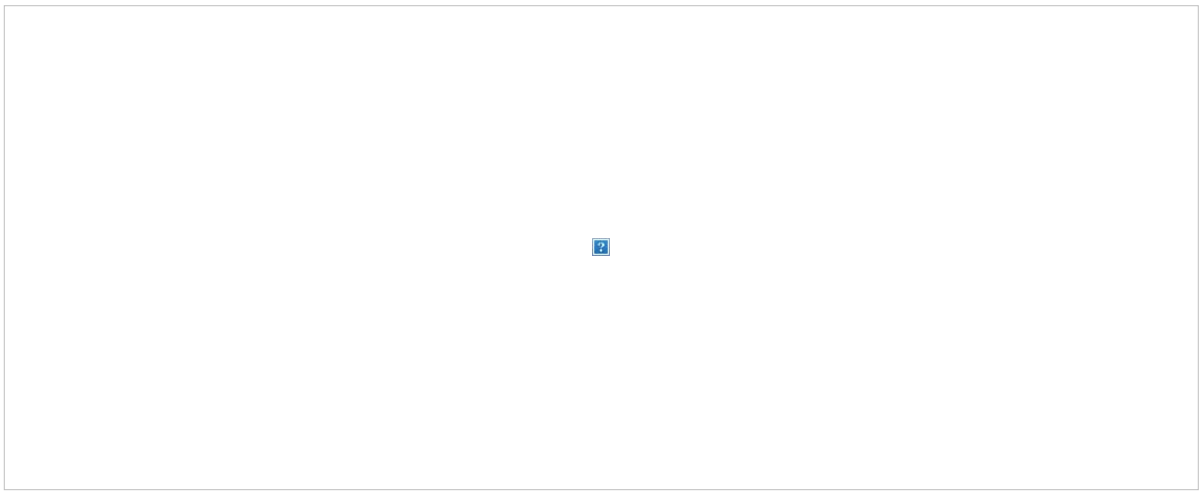
Yours sincerely

Cllr Mrs Karen Randolph
Portfolio Holder for Planning Services

From: Edward Chetwynd-Stapylton
To: Londonplan
Subject: New Draft London Plan - Policy G2
Date: 30 November 2017 14:27:10
Attachments: image002.jpg
image004.png
image006.png
image008.png

To whom it may concern

Following the publication of the draft London Plan yesterday, and a quick review of certain chapters https://www.london.gov.uk/sites/default/files/draft_london_plan_chapter_8.pdf) , please could you correct the error with the use of 'it's' in Policy G2 below. The correct version should be 'its', i.e. the possessive form of 'it', not the contracted form of 'it has' or 'it is'. Thank you.



Kind Regards

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How do you rate the service we provided in this email?

  

Good Average Poor