



Essex County Council

Councillor David Finch
Leader of the Council
Essex County Council
County Hall
Market Road
Chelmsford CM1 1QH

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By email

LondonPlan@london.gov.uk

Mr Sadiq Khan (Mayor of London)
New London Plan
GLA City Hall
London Plan Team
The Queen's Walk
London SE1 2AA

Dear Mr Khan

RE: THE DRAFT LONDON PLAN CONSULTATION

Essex County Council welcomes the opportunity to respond to the consultation on the Draft London Plan. The County Council is committed to working with the Mayor, on a bilateral basis, as well as through the East of England Infrastructure and Growth Group, which I Chair, and also through the Wider South East political meetings, where I represent the East of England Local Government Association (EELGA). This will provide mechanisms for engagement at the County, sub-regional and regional level.

The County Council response to the Draft London Plan consultation identifies issues where further work and/or clarification is needed to ensure we secure the 'mutually beneficial outcomes' for London, Essex and the East of England. I also draw your attention to the response submitted by EELGA which this County Council endorses.

Key issues and messages

- We support the recognition and continuation of Essex, East of England and WSE political liaison arrangements.
- Ambiguity remains with respect to the 'willing partners' approach and clarification is sought on London's intentions with regard to looking to longer term approaches and timeframes for growth management within the WSE. The County Council would seek to explore with its local authorities and London what this could mean in an Essex context given proximity, transport, workforce and economic links.

- Concerns relating to the way in which the WSE thirteen initial strategic infrastructure priorities (transport corridors) are presented to only imply growth opportunities. Attention is drawn to comments within the County Council's October 2017 response to the consultation on the Mayor's Draft Transport Strategy.
- Scope for further collaboration surrounding the economic links between London and Essex; and clarification of the advantages of relocating businesses outside of London.
- Support for the commitment to meet the vast majority of London's housing needs within London. However, there is concern, and clarification is sought on:
 - The scale of housing need in the period to 2029 (it appears to be substantively greater than that averaged out over the period to 2041);
 - The proactive proposals to plan within London's boundaries for the 1,000 homes per annum (identified as the difference between housing need and land supply - 66,000 dpa vs 65,000 dpa, of which the Draft London Plan is silent); and
 - How any housing delivery failure will be managed within London and whether this would necessitate a full review of the Plan, along with a commitment to how such a review would be triggered.
- Concerns relating to the sustainable management of minerals and waste, specifically an absence of evidence relating to available capacity and potentially deficient monitoring arrangements, which may not provide feedback on the effectiveness of policies/data forecasts.

Essex collaboration and willing partners

- Policy SD2: Collaboration in the Wider South East (and supporting text)
- Policy SD3: Growth Locations in the Wider South East and beyond (and supporting text)

The County Council would like to see an agreed process for engaging 'willing partners' to clearly define mutual benefits and articulate how they can be secured. In taking this forward it is recommended that the Mayor engage bilaterally with the County Council and Essex local authorities to explore what this could mean in an Essex context. We are working closely with other authorities in South Essex as part of the Association of South Essex Local Authorities; with authorities in the Innovation Corridor of London-Stansted-Cambridge; and with North Essex authorities on the most significant new garden communities in the country.

The County Council recognises the geographic and economic links between Essex and London and seeks to facilitate outcomes that are mutually beneficial. Essex is home to 1.4 million people. Outside London, Essex is the 8th largest economy in the UK, providing 663,000 jobs and we have ambitions for further economic growth. With this growth comes pressure on housing and infrastructure, and the County Council recognises the challenges to facilitate the delivery of new homes in sufficient numbers and at sufficient pace to meet housing need, aligned to job growth and the timely delivery of infrastructure. This Council and those in the East of England welcomed the recognition by the Mayor in his draft Economic Strategy that the WSE has overlapping economies and his desire to build stronger economic partnerships.

Draft London Plan Policy SD2 references the WSE collaboration arrangements which complement the duty to cooperate. The inclusion of a commitment in policy outlining continued co-operation and collaboration across the WSE on this range of topics is welcomed. Elected members and officers from the East of England (including representation from this Council) have been working with the Mayor of London's team closely since 2013 and have been calling for stronger commitment from the Mayor to this collaboration effort. These arrangements present a vital opportunity to engage 'willing partners', a point that was reflected in the Mayor of London's address to the WSE Summit on 26 January 2018 when he reiterated his commitment to strengthening continued joint working across the WSE.

Draft London Plan Policy SD3 'Growth locations in the Wider South East and beyond' commits the Mayor to working with relevant WSE partners (such as those in Essex), Government and other agencies to realise the potential of the wider city region through investment in strategic infrastructure to support housing and business development in growth locations to meet need and secure mutual benefits for London and relevant partners.

The County Council notes that it is in this context that the Mayor presents his interest in working with 'willing partners' stating that: *'Given the pressure for growth in both London and the WSE, 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 seems to suggest the possibility of locations beyond the capital being suitable to accommodate not only their own local growth, but a proportion of London's growth, and refocuses the policy away from infrastructure and towards the delivery challenges associated with housing growth.

To provide an Essex context, local planning authorities are in the process of finalising NPPF compliant Local Plans, which need to meet in full their objectively assessed needs. This is proving challenging and involves a duty to cooperate with adjoining authorities. Many Essex authorities may be considered potential areas for London's future unmet growth given proximity to the capital; accessibility by road and rail particularly with Crossrail and Cross Rail 2; the existing commuter population; and availability of non-Green Belt land in local authorities beyond the immediate London boundary. However, this must be considered in the context of existing housing and infrastructure pressures within Essex particularly where growth is constrained by flooding from its estuarial coast line, Green Belt and stretched transport infrastructure.

Essex authorities are therefore facing increasing challenges to meet their own growth requirements, with the need for major infrastructure proving a significant hurdle and constraint to growth. Any additional housing pressures from London cannot be subsumed without significant investment in strategic infrastructure and the need to provide and maximise local employment opportunities.

Policy SD3 is supported by Figure 2.15 which shows thirteen initial strategic infrastructure priorities in the WSE and beyond that have been endorsed by the WSE partners for initial delivery. The supporting text states *'Some of these orbital priorities may have more capacity to accommodate additional growth than the radial ones'*. In developing these infrastructure priorities collectively the authorities beyond London have been clear that their purpose is to identify infrastructure priorities, which while supporting growth, should not be construed as growth corridors. Associating these infrastructure priorities within the Mayor's approach to 'willing partners' on managing longer term growth potentially takes their scope beyond that agreed within the WSE political arrangements.

At the WSE Summit on 26 January 2018, the Mayor reiterated his commitment to work with willing partners, stressing that the Greater London Authority (GLA) aims to explore with councils how to work better together and address the concern that London simply wants to export its problems and challenges. As noted earlier, the County Council welcomed the recognition by the Mayor in his draft Economic Strategy that the WSE has overlapping economies and his desire to build stronger economic partnerships. However, the GLA's plans remain unclear on how these stronger partnerships can be brought forward in a way that supports key sectors and the continued economic prosperity and success of the East of England including Essex. An early conversation regarding economic growth and job opportunities would be welcomed.

Essex County Council plays an important strategic role across the county linking economies, and facilitating and providing infrastructure to enable housing and economic growth. We would seek that such discussions take place as part of an agreed process between London, and bilaterally with any Essex locality and the County Council to enable the articulation of what 'mutual benefits' starts to look like and determine if there are appropriate locations for the range of 'benefits' which are as yet undefined. For Essex, the focus of discussions would be maximising the economic advantages between London and places within Essex, improving infrastructure (particularly transport), and then exploring what this could mean for housing provision. We would be open to agreeing a 'willing partners' Memorandum of Understanding with the GLA to clarify the approach.

The County Council wishes to highlight that across Greater Essex there are already strong partnership arrangements between ourselves, local planning authorities and other partners to plan strategically for future growth and prosperity covering West Essex (M11/London-Stansted-Cambridge Corridor), North Essex (A12, A120, Great Eastern Mainline corridors) and South Essex (A13, A127 and the Essex Thames Estuary) together with the Essex Planning Officers' Association. Such partnerships could be used by the Mayor to facilitate discussions.

Before such arrangements take place, the intent of Policy SD3 needs to be clearer outlining timescales for when the Mayor expects growth beyond London to be delivered, and removing the suggestion that the strategic transport infrastructure priorities reflect growth priorities/corridors.

Economic Linkages and Employment

- Policy E4: Land for Industry, logistic and services to support London's economic future (and supporting text)
- Policy E5: Strategic Industrial Land (and supporting Text)

- Policy E7: Intensification, co-location and substitution of land for Industry, logistics and services to support London's economic function (and supporting text)
- Policy E8: Sector Growth and Clusters (and supporting text)

As noted earlier in this response, there is scope for further collaboration surrounding the economic links between London and Essex. The LSE's migration review noted that, the economic interconnections have '*matured to a stage where almost all of it is integrated in one economic agglomeration*' (LSE, Review of Research on Migration Influences and Implications for Population Dynamics in the Wider South East, page 23).

Representatives of the GLA have previously expressed an interest in facilitating moving jobs beyond London and into the WSE. As with many localities, unfortunately several towns in Essex have lost office space under existing permitted development rights, and face difficulty attracting replacement businesses as they do not necessarily consider opportunities beyond London's boundaries. High quality employers are key to sustainable local growth and there would be a mutual benefit to London and Essex councils if more jobs were created outside London so that more residents were able to live and work locally thereby easing pressure on London and the region's already strained transport network and housing. Chelmsford for example has seen an increase in recent years in the number of former London back-office insurance and finance jobs being relocated in a cluster around Chelmsford station. Conversations to further explore employment opportunities and locations within the county would be welcomed.

The County Council welcomes the commitment in the Draft London Plan for a strategically co-ordinated process to the redevelopment of land used for industry, logistics and services. Policy E7 focuses on intensification within London as well as the potential for substitution outside London where there is local agreement. As mentioned in the supporting text this should only be considered where this results in mutual advantage, such as complementary business opportunities and transport infrastructure improvement.

The three boroughs identified for limited release of industrial land and floorspace are boroughs within the Thames Gateway that link to local authorities within Essex. The limited release is based on these areas having relatively low values and high vacancy rates. Notwithstanding the general supportive position of the economy policies in the Draft London Plan (such as the aim for no net loss of industrial land uses), the application of the intensification approach needs to be applied within these three boroughs. London's industrial study highlighted that two of the three boroughs assigned for limited release (Havering and Barking & Dagenham) actually saw net increases in floorspace between 2001-2016. The report also notes that '*there are some signs that occupiers and developers who would previously only consider west London locations are now looking to the east*' (CAG, London Industrial Land Demand, page 213). These factors indicate that pursuing intensification is a justified approach and the interaction between the proposed policies could be clearer in this regard.

The protection afforded to secondary materials and waste management in the Draft London Plan (policies E4 and E5) is welcome and benefits the vitality of the wider waste supply chain but, so to link with the safeguarding policy on aggregates (SI10), reference could also be made to aggregates within the economic policies.

It is noted in Policy E8 that the Mayor has identified a number of sector-specific opportunities and challenges and these sectors are also addressed in the Mayor's draft Economic Development Strategy. The County Council considers that additional wording should be included in the supporting text to this policy to recognise the mutual benefits of the Mayor working with the Wider South East authorities to maximise growth of these sectors through collaborative working on the location of key clusters and hubs, development of ancillary/spin-off industries, and provision of supporting infrastructure and skills and training.

Transport

Securing improvements to the strategic road and rail networks that connect Essex to the rest of the UK and London to enable trade within the wider UK and global economies is essential. Transport connections to and within Essex are generally good, providing links to London and elsewhere in the UK. However, transport delays and unreliability on the networks have direct costs to people, businesses and negatively affect productivity and innovation.

The County Council acknowledges that the economy of Essex is inextricably linked to London's and plays an important role in complementing and enhancing the position of London as a global city. However, the historical neglect in transport investment in Essex, and the East of England more generally, risks jeopardising the future growth of not just the region but also of London.

As noted earlier in this response, the County Council has for some time been working with other local authorities, including London, across the East of England and the WSE to identify the initial strategic infrastructure priorities where investment is necessary to deliver a thriving economy. Thirteen priorities for the WSE are reflected in Figure 2.15 of the Draft London Plan. Economic growth and the provision of new housing in London, Essex and the East of England depend on improvements to connectivity and sufficient capacity of the strategic transport network. Promoting investment in the 13 transport corridors should be seen as a priority for all partners in the WSE and it is one that this County Council supports; and we emphasise the role the corridors play in the wider economy and the delivery of growth within Essex. Investment in the identified strategic infrastructure priorities (both road and rail) also has the potential to re-balance the Essex and East of England economy away from a dependency on London by, for example, improving access to ports to drive exports. As noted in explanatory text for Policy SD3, the investment requirement is not confined to the radial strategic transport corridors. While these radial corridors provide access to London, principally for commuters travelling to work by rail, investment in orbital routes such as the A120 (currently omitted from Figure 2.15) would enable both road and rail traffic to divert away from London. Accordingly, the County Council seeks that the A120 is included on Figure 2.15 as a strategic infrastructure priority that will deliver mutual economic benefits.

The County Council identifies five strategic transport corridors that are essential to the Essex economy, connecting our key economic growth locations to each other, to London and the wider UK and global economies.

1. M11 corridor including the West Anglia mainline and Crossrail 2

2. A12 corridor including the Great Eastern mainline
3. A13/A127 corridor and parallel Essex Thameside rail line and the potential Crossrail 2 eastern branch
4. A120/A14 and parallel rail routes connecting our ports to the Midlands
5. Lower Thames Crossing to Cambridge (A130, A120, M11)

Key strategic transport projects where the County Council would wish to work with London and other relevant partners include:

- West Anglia mainline 4-tracking and the delivery of Crossrail 2
- Improved surface access to London Stansted Airport for all modes of transport
- Improvements to the Great Eastern mainline and Elizabeth line; capacity and access improvements at Liverpool St, Stratford, Brentwood and Shenfield stations, and the introduction of a 'digital railway' solution to enhance capacity
- Securing the confirmation of RIS1 and RIS2 improvements to deliver the 'A12 Expressway'
- Options for a Crossrail 2 eastern branch
- Rail freight solutions that accommodate both passenger and freight growth
- Lower Thames Crossing and other proposed crossings of the Thames in eastern London to ensure proposals are optimised for growth
- The development of transport corridor solutions to accommodate growth along the A13 and A127.

London's ambition to create a transport network that is sustainable and able to provide for its growing population is welcomed, however if London is to achieve the vision set out in the Mayor's Transport Strategy and the Draft London Plan, the Mayor would benefit from supporting partners outside of London in key strategic projects and ensuring that there is meaningful engagement on transport beyond London's boundaries. The County Council particularly welcomes support for Crossrail 2. This project not only delivers much needed regeneration and growth within London along the Lea Valley but also supports growth along the wider London-Stansted-Cambridge corridor, including at Harlow where the Enterprise Zone provides high quality employment, and significant new housing is planned across the Harlow and Gilston Garden Town; and at London Stansted Airport.

The Mayor's sustainable transport ambitions (in relation to extending Transport for London's (TfL) franchise, car travel and air pollution in particular) also need to be considered in a wider context and conversations with the County Council and those Essex councils most likely to be impacted on London's boundaries, need to be given greater priority.

The need for people to travel is not confined by geopolitical boundaries and the provision of transport services across the London boundary is an additional challenge especially when the different legislative frameworks exist. There is a need to strengthen cross-boundary relationships between TfL and transport bodies and councils in Essex and the East of England so that different modes of transport can be linked and planned more effectively in advance of any future transport ambitions of London and its neighbouring authorities. In order to achieve the Mayor's ambitions in relation to upgrading of rail freight routes especially to the growing ports on the Thames, Felixstowe and Harwich, and improvements

to surface links to airports (notably London Stansted and London Southend in Essex), the Mayor is asked to collaborate with councils in the East and wider partners to make the case for expanding road and rail capacity both within and outside of London.

London's housing need and ability to meet its requirement

- Policy GG4: Delivering the Homes Londoners Need
- Policy H1: Increasing housing supply (and supporting text)
- Policy H2: Small sites (and supporting text)
- Policy H3: Monitoring housing Targets (and supporting text)

The County Council supports the commitment in the Draft London Plan to meet the vast majority of London's housing needs within London. However, there is concern, and clarification is sought on:

- the scale of housing need in the period to 2029 (it appears to be substantively greater than that averaged out over the period to 2041);
- the proactive proposals to plan within London's boundaries for the 1,000 homes per annum identified as the difference between housing need and housing land supply (66,000 dpa vs 65,000 dpa); and
- how any housing delivery failure will be managed within London and whether this would necessitate a full review of the Plan, along with a commitment to how such a review would be triggered.

The County Council refers the Mayor to the EELGA response to the Draft London Plan, which contains further details on these housing matters and a technical note on London's housing requirement evidence base. Specific points this County Council wishes to highlight are included below.

Housing land supply vs housing need and housing delivery

There are no indications of effective monitoring frameworks which will ensure that the Mayor delivers on his housing ambition as well as the supporting infrastructure. With the right monitoring frameworks and appropriate policy wording to set out appropriate contingencies/actions in the event that delivery falls short of policy requirements, the Mayor would be able to demonstrate how London is progressing on its ambitions and avoid the risk of unintended and unplanned pushing of London residents into the WSE and beyond.

The County Council seeks confirmation within the new London Plan (both policy and supporting text) that any housing delivery failure is a matter for London and would be dealt with by means of a review of the Plan. There may also be merit in calling for the new Plan to include a trigger point for a review for example, a specific number of years of failure or cumulative under delivery percentage. This would demonstrate how London is progressing on its ambitions and avoid the risk of unintended and unplanned consequences beyond London.

The Draft London Plan identifies land for a housing supply of 65,000 dpa compared to a housing need of 66,000 dpa, resulting in a shortfall of 1,000 dpa. Whilst the County Council supports the Mayor's commitment to meet 65,000 dpa of identified housing need within

London's boundaries, clarification is sought on the proactive proposals to plan for the 1,000 dpa undersupply within London's boundaries.

The current London Plan, which failed to proactively plan for the level of identified need (but in that case the gap is 7,000 dpa) contains policy wording that seeks to encourage London Boroughs to exceed their specific housing targets to make inroads into managing the 7,000 dpa shortfall between 'need for' and 'plan for' (*'Boroughs should draw on the housing benchmarks in table 3.1 in developing their LDF housing targets, augmented where possible with extra housing capacity to close the gap between identified housing need.....'*). The Draft London Plan contains no such wording and therefore there is no clarity on the position in relation to the 'missing 1,000 dpa' and how this will be accommodated within London's boundaries or otherwise. The position on this matter needs to be clarified in the new Plan.

There would clearly be a range of potential serious consequences if housing delivery within London continues to fail – both within and beyond the capital (exacerbating the tendency to migrate, increasing commuting, increasing migration assumptions within official population projections, etc.). Given the scale of the challenge ahead it would seem prudent for the GLA to plan for the possibility of failure and the Draft London Plan is not as clear as it might be in terms of what would happen were failure to materialise. A clearer link in the Plan to the Mayor's Housing Strategy and the relationship between the two documents may further assist in providing clarity and assurances that these two documents combined, together with concerted effort of all partners, achieves the Mayor's desired housing delivery uplift.

The Mayor's policy with respect to the Green Belt is considered to impact negatively on London's ability to achieve its aspiration of delivering the identified 65,000 dpa, particularly at a time when a number of Essex councils have had to make tough decisions to release Green Belt in order to meet objectively assessed needs.

Affordable homes

The London Plan must ensure that the required range and mix of private and affordable housing is delivered within London. London boroughs should be required to deliver affordable homes within their area to avoid the relocation of people into Essex and to prevent inevitable additional strains on resources from already stretched public services, as has been the experience in several Essex local authorities. The Mayor should also do all he can to ensure that London boroughs do not inappropriately discharge their homelessness obligations by placing people in Essex without the right levels of support and care.

London's waste management

The County Council is responsible for Minerals and Waste Planning across the county; in addition to dealing with planning applications, this also includes the preparation of local plans and the allocation of new capacity for minerals and waste. A detailed response relating to minerals and waste issues has been included in an appendix and covers a number of the Draft Plan policies.

The detailed response seeks to highlight the potential implications for Essex including waste and mineral capacity in the county. The County Council has adopted both a Mineral

and Waste Local Plan in recent years, and there is concern that the policies of the Draft Plan as currently published may result in additional pressure on capacity allocated through the Essex Mineral and Waste Plans. The key concerns highlighted in the detailed comments include:

- No specific arrangements in place to address sterilisation of mineral resources despite a considerable reliance on imports of aggregate into London to facilitate development.
- An approach to net self-sufficiency in relation to waste management which does not seem to apply to CDEW and an absence of factual evidence relating to available capacity in surrounding areas to deal with this waste stream. Where such waste is to be exported by London Boroughs, an accurate forecast in line with NPPW should be set out to enable surrounding counties to plan effectively.
- A waste evidence base which refers to now defunct national policy (PPS10) as justification for the approach identified.
- Potentially deficient monitoring arrangements, which may not provide feedback on the effectiveness of policies/data forecasts.

The County Council looks forward to further engagement and discussions on the matters raised in our response before the Draft London Plan is submitted for examination.

Yours sincerely

Councillor David Finch
Leader of the Council

APPENDIX 1

Detailed comments on specific Draft London Plan policies

Paragraph, Policy	Comment
<p>GG5 – Growing a good economy GG6 – Increasing efficiency and resilience</p>	<p>The role that a sustainable supply of minerals and effective waste management play in growing a good economy and increasing efficiency and resilience should be highlighted in these overarching policies. Economic and residential development can only occur when sufficient minerals can be economically sourced to facilitate their development, whilst economic activity generates waste which must be managed as locally as possible to ensure a cost effective waste solution for the local economy. There is a brief mention of this in relation to the Circular Economy at paragraph 9.7.1 but such principles would be well served by being included within the ‘Planning for Good Growth’ section.</p>
<p>Policy E4 – Land for industry, logistics and services to support London’s economic function</p>	<p>The recognition of the need to supply land in different parts of London for the purposes of waste management is strongly supported. The protective measures with regard to ensuring the continued supply of industrial land as suggested through this policy and its supporting text are also supported.</p>
<p>Policy E5 – Strategic Industrial Locations (SIL)</p>	<p>The explicit recognition for waste management being a ‘other industrial-type function’ that could be appropriately located within industrial locations alongside other forms of industry / employment is strongly supported, as is the policy approach of securing the potential for 24hour operation in these areas. It is however considered that the provisions relating to waste management could be explicitly extended to Policy E6 – Locally Significant Industrial Sites in order to confirm the appropriateness of waste facilities in these areas, where the waste management facility proposed can be suitably located within the LSIS in terms of built form, emissions, transport movements etc. such that it would not be detrimental to the character or aims of the LSIS.</p>
<p>Policy E7 – Intensification, co-location and substitution of land for industry, logistics and services to support London’s economic function</p>	<p>Whilst the justification for such a policy is clear, it is considered that the intensification of industrial land in this manner will impact on different industry types in a markedly different manner, including to the extent that some industrial practices may be untenable in certain mixed use environments. The final form of this policy will have to ensure that there is a sufficient quantity of industrial land in the respective London Borough(s) to accommodate ‘bad neighbour’ industries following intensification/co-location/substitution, where the current and forecasted need for such facilities has been established. As a sui-generis use considered acceptable on B2/B8 land, the waste industry may be negatively impacted by such proposals compared to other types of uses found on such estates. Estate reconfiguration may also preclude the establishment of certain types of industry not</p>

Paragraph, Policy	Comment
	currently operating within a particular estate which could've otherwise been considered at the location in the future. Such reconfiguration then acts to reduce the range of uses such an estate may otherwise have been able to incorporate.
Policy SI3 – Energy Infrastructure	The recognition that waste can form part of energy infrastructure is welcomed as, based on the waste hierarchy, this offers a last resort for utilising waste products before consigning them to disposal. With landfill becoming an increasingly less sustainable form of waste management, particularly in London, opportunities to reduce the amount of waste disposed of in this manner should be appropriately considered as part of the overall energy mix. The supporting text to this policy does not however expand on the 'possible opportunities to utilise energy from waste' as highlighted by policy, save for a brief mention at paragraph 9.3.7. It is therefore considered that the London Plan could go further in exploring the benefits of this practice here, even if it's just by means to a reference to that contained in paragraph 9.8.5 where this is discussed.
Policy SI7 – Reducing waste and supporting the circular economy	The support for the principles of the Circular Economy are made clear through this policy and are supported, particularly the requirement for applicants to consider how best to manage the waste arising as a result of their development through its construction, developed and end-of-life phases.
Policy SI8 – Waste Capacity and net waste self-sufficiency	<p>The policy stance of attempting to be net self-sufficient in waste management by 2026 is strongly supported and is sympathetic to the challenges that other Waste Planning Authorities have in achieving net self-sufficiency in their own waste management. The statement “new waste management sites should be provided where required” (Policy SI8 – A4) is considered to be a clear indication of expectations, as is paragraph 9.8.3 (“...sufficient sites should be identified within London to deal with the equivalent of 100 per cent of the waste apportioned to the boroughs”). The definition of what it means to manage waste provided by paragraph 9.8.4 is accepted. The flexible approach to how this may be achieved within the plan area is supported as is the reiteration that waste management can contribute towards renewable energy generation.</p> <p>What is not clear however is how the apportionment value for each borough has been calculated. There does not appear to be a link between the scenarios set out in Task 4 – Updating the apportionment method Methodology Report (SLR/LUC, 2017) and the London Plan itself. Notwithstanding this point, it is accepted that forecasting waste arisings is not straightforward and as such it is important that waste forecasts are monitored to assess their appropriateness as a</p>

Paragraph, Policy	Comment
	<p>basis for planning provision. Such a commitment is must be mentioned in the policy, supporting text and within the monitoring framework set out in Table 12.1.</p> <p>Clause D4 requires that “where a site is likely to produce significant air quality, dust or noise impacts, it should be fully enclosed”. This is supported in principle but clarification ought to be provided with regard to what constitutes a significant impact. For example, would a ‘significant impact’ be assessed if the site was within an industrial area which already creates such impacts. Essentially, would it be required that there would have to be a sensitive proximal use or feature that could be detrimentally impacted upon before a significant impact could be assessed?</p> <p>The encouragement of development proposals which contain commitments to effectively deal with CD&E waste on site and minimise export to landfill (Policy SI8 – C5) is also strongly supported as the bulk of London’s waste exports to Essex and the wider East of England take the form of CD&E waste. Minimising the export of this waste stream could therefore strongly contribute to sustainable waste management goals.</p> <p>However, through an interrogation of the evidence surrounding the London Plan, it is clear that CD&E waste is not covered within individual borough’s apportionments and therefore the principle of net self-sufficiency is intended to not apply to CD&E waste. <i>Task 4 – Updating the apportionment method Methodology Report (SLR/LUC, 2017)</i> seeks to justify this approach by stating that it is in accordance with PPS10. It is stated in the Methodology Report that PPS10 “explicitly limits the requirement for apportionment to household waste and commercial and industrial waste, therefore excluding CDEW” and that PPS10s successor (the NPPW) is not explicit with regards to CDEW. As noted in Appendix 1 of that report, PPS10 has been revoked and as such it is not considered to be a strong basis for policy. Although it is noted that the NPPW is not explicit regarding the CDEW, it does state that “waste planning authorities should have regard to their apportionments set out in the London Plan when preparing their plans” and “in particular, identify the tonnages and percentages of municipal, and commercial and industrial, waste requiring different types of management in their area over the period of the plan”). The requirement to assess municipal and commercial and industrial waste <i>‘in particular’</i> does not preclude a requirement to assess the</p>

Paragraph, Policy	Comment
	<p>potential for London to appropriately assess opportunities to manage CDEW in the Plan area. Appendix 1 then lists a number of reasons why the apportionment of CDEW would be “problematic”, and given these reasons, “it is arguably appropriate” to not quantify CD&E arisings. This approach is strongly questioned. More detail is provided under ‘Task 2 - CDEW and Hazardous Waste Forecasts.</p> <p>Other than on-site management, the Plan seeks to manage CD&E through a continuation of existing exportation patterns rather than proactively looking at potential internal solutions, or justifying why such are not practicable. This assumption that current disposal patterns can continue is not considered justified and is therefore not supported. More detail is provided under ‘Task 2 - CDEW and Hazardous Waste Forecasts’.</p>
<p>Policy SI9 Safeguarded waste sites</p>	<p>The principle of waste safeguarding is supported but it is considered that more detail could be provided with regard to the spatial extent to which safeguarding provisions could apply, and when these should be given focus within a planning application.</p> <p>It is considered beneficial to highlight that ‘waste sites’ could also include key infrastructure which facilitate the movement of waste such as wharves. It is recognised that the policy principle of safeguarding wharves is established elsewhere in the Plan (at SI15 – Water Transport, Policy T7 – Freight and servicing) but it could nonetheless be highlighted within the appropriate waste policy to recognise the importance transfer sites play in the sustainable management of waste. It is noted that safeguarding wharves is highlighted within Policy SI10 – Aggregates.</p>
<p>Policy SI10 – Aggregates</p>	<p>The policy principles are supported but the approach to apportionment does not seem to reflect that advocated in the NPPF. The approach of stating a minimum amount of permitted reserve is supported in order to provide certainty in a level of supply but clarification should be provided within the London Plan as to why these particular apportionments are considered to be appropriate. The Local Aggregate Assessment for London 2016 states that “...the current review of the London Plan, will re-consider the apportionment in the light of the requirements of the NPPF and PPG and the development needs of London.” It is unsure whether this reconsideration has occurred or has been appropriately documented. It is noted that the current landbank in London stood at 2 years in 2015, as reported by the Local Aggregate Assessment 2016.</p>

Paragraph, Policy	Comment
	<p>Proposals to safeguard wharves with existing or potential capacity for aggregate distribution and/or processing to ensure more sustainable distribution and use of aggregate is supported. In light of the constrained supply of mineral within London itself, safeguarding the means to import aggregate is critical to maintaining an appropriate supply.</p> <p>There are currently no safeguarding provisions in the London Plan relating to mineral that is yet to be extracted. Whilst opportunities for wholesale prior extraction and therefore the likelihood of mineral sterilisation may be more limited in London than elsewhere, the London Plan should still advocate this practice in accordance with sustainable mineral principles. Support could also be given to the requirement to support applications with Mineral Resource Assessments to establish the quality of material that may otherwise be sterilised. These assessments could also explore the potential to use indigenous material for the construction of the proposed development itself in order to off-set the amount of mineral that would otherwise be bought into the site.</p>
Policy M1 – Monitoring	<p>Table 12.1 set out no commitment to monitor the appropriateness of the waste forecasts underpinning Policy S18 – Waste Capacity and therefore accordance with net waste self-sufficiency across the London Plan area. There are also no monitoring indicators to ensure that waste capacity is provided in line with forecasted need and is also not lost through, for example, the redevelopment of industrial land as envisaged through Policy E7 – <i>Intensification, co-location and substitution of land for industry, logistics and services to support London’s economic function</i>. There are no mineral related indicators and although it is accepted that mineral data can and will be accrued through the Local Aggregate Assessment for London, there seems to be a clear role for the London Plan to understand mineral movements given that aggregate provision is crucial in facilitating development. The loss of wharf capacity in particular is a critical issue both nationally and in London, and this should be monitored through the London Plan.</p>
Evidence Base	
Task 2 – CDEW and Hazardous Waste Forecasts (Regarding Policy S18)	<p>Section 2.4.2 assesses historical export of CDEW to the East of England. It is questioned why this reporting tier was used as this regional/sub-national tier is not the current basis for waste planning, which is undertaken at the county level. To be meaningful and comparable, data should be presented that assesses areas on the basis of the administrative area of each Waste Planning Authority. The current Essex and Southend-on-Sea Waste Local Plan (2017) forecasts a significant</p>

Paragraph, Policy	Comment
	<p>deficit in CDEW landfill capacity across its plan period (up to 2032). The Task 2 report does however further note that “it cannot be assumed that historical rates of new void creation will continue in future years. It is therefore suggested that the GLA engages with waste planning authorities within these regions, and with the Environment Agency, to develop projections for future void availability.” The requirement to engage with waste planning authorities is naturally strongly supported.</p> <p>It is questioned whether there is an inherent contradiction between at least partly planning for CDEW disposal by way of inert landfill solutions outside of London and the policy principle of “the equivalent of 100 per cent of London’s waste should be managed within London (i.e. net self-sufficiency) by 2026” (Policy SI8). Section 2.4.2 further states that “Analysis using the Waste Data Interrogator confirms that where CDEW originating in London is destined for landfill, the majority of this material is exported outside the capital for disposal.” A central point to the argument that CDEW should not be apportioned is that the data is poor. Whilst it is accepted that this is the case, only LACW data is considered robust due to the way it is audited. If it can be stated that the majority of CDEW is exported outside of the capital for disposal, it would indicate that there was merit in understanding how better that waste stream could be managed within the Plan area.</p> <p>Section 3.3.2 notes that “EA data also suggests that no hazardous waste was disposed to landfills in London in 2014 or 2015.” This section also assumes a continuation of historic disposal routes, noting that there is sufficient space in existing landfills outside of the Plan area to accommodate hazardous waste. This is not disputed and it is recognised that quantities are small in terms of waste management as a whole. However, the principle espoused by Section 3.3.2, that “Given the national extent of movements of hazardous waste generated in London, it would arguably not be appropriate to engage with neighbouring regions on the issue of hazardous waste landfill capacity”, again creates a tension between the policy goal of SI8 which is to achieve net self-sufficiency. It is suggested that London as a whole generates a relatively significant amount of hazardous waste and assuming its continued exportation is appropriate in the absence of conversations with other waste planning authorities is not an appropriate approach to what may be a strategic planning issue. When the proportion of London’s hazardous waste is over 10% of the total hazardous waste</p>

Paragraph, Policy	Comment
	<p>managed in the plan area (as it is for the North West and East of England regions), it is suggested that this may equate to a strategic issue. Whilst it may not be appropriate to address this issue in the London plan across the whole of London, this issue may be of particular strategic importance at the Borough level and ought to be appropriately addressed through dialogue with the relevant Waste Planning Authorities. The London Plan should set the expectation for this dialogue.</p> <p>Whilst it is accepted that ‘net self-sufficiency’ involves a trade-off in capacity, the London Plan does not seek to provide an assessment of the balance between import, export and self-management through which ‘net self-sufficiency’ could be benchmarked or monitored. The London Plan evidence in some areas seems propagated on the basis of continued significant exportation of waste streams. Whilst this may be practical / unavoidable (at least in the short term), policy SI8 should more accurately reflect those waste streams to which the principle of net self-sufficiency is practical.</p> <p>It is noted that Section 4 presents a justification for not apportioning CDEW due, at least in part, to inaccuracies within existing data. This is noted, but it also does not provide an appropriate solution to the fact that millions of tonnes of CDEW is undoubtedly exported from the plan area annually (at least in part identified through the aforementioned Environment Agency Waste Interrogator Data). Planning Policy Guidance states that forecasts of CD&E waste should be based on the principle of net arisings remaining “constant over time” (para 33, ID: 28-033-20141016) Policy SI8 and its evidence should set the expectation for London Boroughs and appropriate Waste Planning Authorities to more accurately quantify the capacity required to manage London’s CDEW, particularly that exported over the Plan period, and ensure that existing capacity is available both within and outside of London.</p>