



Executive Member Environment, Planning and Transport

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Dear Mayor,

THE LONDON PLAN - THE SPATIAL DEVELOPMENT STRATEGY FOR GREATER LONDON DRAFT FOR PUBLIC CONSULTATION – DECEMBER 2017

Thank you for the opportunity to comment on the above.

The Plan as a whole and the Good Growth policies

The Plan covers a very wide range of planning issues – from the very strategic issues of providing for new homes and supporting the economy right down to detailed matters such as the design of streets and protection of pubs. As a package of strategies, approaches and policies, the Plan is proactive, comprehensive and challenging and is broadly supported by the County Council. The six core Good Growth policies providing the framework for the Plan as a whole are supported.

Level of Housing need

The Plan identifies an annual need for 66,000 dwellings per annum (dpa). The greatest proportion of that need is determined by projecting population/household formation over the period 2016-2041. However, the housing targets within the London Plan only deal with the period 2019-2029. If one uses the same 2016 baseline and takes the 2029 timeframe for which housing targets are set – a period of 13 years - the average annual need appears to rise by at least 10,000 dpa. This represents a significantly greater level of need than that identified in the Plan and proposed to be catered for in housing targets. Clearly, not actively planning for higher levels of short term need has potentially significantly implications for both London and areas beyond.

Clarification has been sought from the GLA on this matter, but none received. The issue needs to be rehearsed in advance of and in preparation for the Examination and the implications of not planning to provide for 2019-2029 levels of need (if this is in fact the case) and how these are to be managed clarified.

Meeting Housing Needs within London

The London Plan Further Alterations published in 2015 identified a housing need of 49,000 dpa and a housing target of 42,000 dpa. In practice, London struggles to deliver half of its need and a recent high in delivery in 2014/15 of 32,440 was still 17,000 dpa short of the annual level of need and 10,000 dpa short of the extant London Plan target. In the period 2001/2 to 2014/15 average annual housing delivery within London was 27,444 dpa. Housing delivery failure against London Plan targets is a consistent and ongoing theme.

This Plan identifies a housing need of 66,000 dpa and a housing target of 65,000pa. This target is to be achieved through a range of mechanisms - maximising opportunities on brownfield sites, within opportunity areas (areas typically contain capacity for at least 5,000 net additional jobs or 2,500 net additional homes or a combination of the two), optimising housing density, intensification within Outer London, a crucial role of the town centre network, enhancing the role of small sites, mixed use redevelopment of low density car parks and retail, incremental intensification of existing residential areas, both strategic and small scale regeneration, etc. Growth is to be achieved without encroaching into the Green Belt – the Mayor strongly supports the protection of the Green Belt and of Metropolitan Open Land and there are policies to protect these from inappropriate development.

London is going to have to at least double annual housing delivery if the proposed targets are going to be achieved, which given the backdrop of persistent delivery failure appears very challenging. However, the Mayor sees *'London's housing crisis is the single biggest barrier to prosperity, growth, and fairness facing Londoners today'*. The draft housing Strategy and this draft Plan contain a wide range of policy and other measures designed to achieve his vision and it may well be that these two strategies combined, together with concerted effort of all partners, achieves the Mayor's desired housing delivery uplift.

Whilst the Plan's commitment to meet the majority of identified housing needs appears to be very challenging in the light of persistent delivery failure, the County Council welcomes the Mayor's commitment to meet the majority of London's housing needs within the Capital.

Housing delivery failure?

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). The pressures placed upon areas beyond London, particularly closest to it in places like Hertfordshire, would potentially be intense. Given the scale of the challenge ahead it would seem prudent to plan for the possibility of failure and the Plan is not as clear as it might be in terms of what would happen were

failure to materialise. The Mayor himself recognises that the London housing crisis *'.....is unacceptable and I am determined to make a difference. I have been honest with Londoners from the start – we are not going to be able to turn things around overnight. This is going to be a marathon, not a sprint. But we are working hard every day and we have already started to take big steps forward'*. Even the Mayor does not appear to expect a significant change in the short and even perhaps medium term.

At an informal briefing for Hertfordshire local authorities on 10 January the GLA was asked what the Mayor's response would be were housing delivery failure to materialise – would that failure be managed within London or would the Mayor be looking for support from further afield? The response was that failure would be addressed by a review of the Plan, not by placing expectations upon local authorities beyond London.

Whilst this commitment is welcomed, it is possible to envisage a scenario in which local planning authorities bringing forward local plans beyond London are pressurised by some parties, and perhaps asked by Local Plan Inspectors, to explain how they propose to address housing delivery shortfall within London – are they to uplift their housing targets?

Under these circumstances, and to offset any ambiguity, the County Council seeks confirmation within the Plan (probably within both policy and supporting text) that housing delivery failure is a matter for London and would be dealt with by means of a review of the Plan. This approach might include confirmation of appropriate trigger points for such a Review.

By way of example (illustrative new text highlighted by underline thus):

Chapter 4

Housing

4.1.3 To achieve these housing targets the overall average rate of **housing delivery** on both large and small sites will need to approximately double compared to current average completion rates. The Mayor recognises that development of this scale will require not just an increase in the number of homes approved but also a fundamental transformation in how new homes are delivered. The London Plan, London Housing Strategy and Mayor's Transport Strategy together provide a framework to help achieve this ambition but achieving this step change in delivery will require increased levels of funding to support the delivery of housing and infrastructure, which is discussed in more detail in Chapter 11. The Mayor also appreciates that given the scale of the ambition there is a risk that this step change will not happen to the extent of the ambition and with necessary speed. This is why he is putting in place mechanisms to monitor and manage housing delivery and if necessary Review the London Plan within Chapter 12.

Chapter 12

Monitoring and Review

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12.1.5 The AMR is not the only tool to monitor London's performance. It is complemented by other thematic reports including, for example, the Energy Monitoring Report and TfL's Travel in London Report. Their indicators do not need to be duplicated in the AMR.

'Review of the London Plan

Policy R1 Review of the Plan

A Should monitoring of implementation in accordance with Policy M1 indicate that key aspects of the Plan are not progressing as anticipated, the Mayor will consider instigating a Review of the Plan. The Mayor will use the Annual Monitoring Report as the mechanism through which to assess the need for such a Review.

12.1.6 The Annual Monitoring Report process set out within Policy M1 will be used by the Mayor to assess whether, in the event key aspects of the Plan are not being delivered, a review of the London Plan is necessary. The Mayor is particularly conscious of the ambitious housing targets within the Plan and attaches great importance to their delivery. Should delivery of London-wide annualised housing targets within Table 4.1 fail by 'X%' over any rolling 'X' year period, a review of the Plan will be triggered.'

The 'missing 1,000dpa'

The Plan identifies a need for 66,000 dpa and considers it has capacity to and contains specific policies and targets to deliver 65,000 dpa. The previous London Plan, which similarly failed to proactively plan specifically for the level of identified need (but in that case the gap was 7,000 dpa), contained policy wording (*'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..'*) that sought 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'. This Plan contains no such wording and there is no clarity on the position in relation to the 'missing 1,000 dpa' homes. Clarification has been sought from the GLA, but no response received. This matter needs to be rehearsed in advance of and in preparation for the Examination and the implications of not proactively planning for the 'missing 1,000dpa' and how this is to managed clarified.

By way of example, policy wording that would be consistent with the extant London Plan might read (illustrative new text highlighted by underline thus):

'Policy H1 Increasing housing supply

A Table 4.1 sets the ten-year targets for net housing completions which each local planning authority should plan for. Boroughs must include these targets in their Development Plan documents augmented where

possible with extra housing capacity to close the gap between identified housing need.'

Collaboration in the Wider South East

The recognition of the existing wider south east political arrangements and the commitment to continue the collaboration to deal with shared issues is something Panel may feel the County Council could welcome and support. As the Plan progresses it would be useful for the wider south east to work together with the Mayor to make any necessary improvements to this proactive and positive policy and the narrative around it.

Growth locations in the Wider South East and beyond

The purpose and intentions of Policy SD3 and its supporting text are not at all clear. The text of the policy A appears to relate to investment in strategic infrastructure (presumably transport) to support growth where there are relationships to London (though the title of the policy suggests it is about growth locations beyond London). But when one turns to the supporting text, the focus seems to turn away from infrastructure and towards the delivery challenges associated with housing growth:

*'.....that as far as possible sufficient provision will be made to **accommodate the projected growth within London.***

*The GLA's new **Strategic Housing Market Assessment** shows that London has a need for approximately 66,000 additional homes a year. The Strategic Housing Land Availability Assessment suggests that London has the capacity for around 65,000 additional homes a year and the housing targets in this Plan reflect this....*

Despite this Plan seeking to accommodate the vast majority of London's future growth, some migration will continue'

*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 start to explore the possibility of locations beyond the capital being suitable to accommodate not only growth generated there, but also some of London growth. This message is then reinforced in paragraphs that follow:

'.....The focus is on locations that are (or are planned to be) well connected by public transport and where development can help meet local growth aspirations as well as wider requirements. Recognising that investment in public transport can often bring significant benefits to wider areas, such partnerships could focus on optimising rail capacity between

London, the wider region and beyond. Another area of focus could be proposals for new/garden settlements with good links to London.....

.....Collaboration with willing partners can help alleviate some of the pressure on London while achieving local ambitions in the WSE for growth and development, recognising that this may require further infrastructure.....

*.....The Mayor will work with key **willing partners**, including local authorities, Local Enterprise Partnerships, the National Infrastructure Commission and Government, to explore strategic growth opportunities where planning and delivery of strategic infrastructure (in particular public transport) improvements can unlock development that supports the wider city region.....*

.....The Mayor continues to encourage authorities outside London to become willing partners and work with the capital on opportunities for growth, where mutual interest can be achieved.'

The 'willing partners' approach appears to relate to 'longer-term contingencies', though 'longer term' is not defined. It may well be that this whole section of the Plan is designed to pave the way for a strategic dialogue between London and the wider south east and beyond about how the next tranche of strategic growth (demographic and economic) is to be managed, including the possibility of exportation of London growth, **for the period post-2029**. Reference is made, for example, to the National Infrastructure Commission being one of the 'willing partners' and this could reflect a view by the Mayor that initiatives such as the Oxford-Cambridge Corridor and the scale of growth potential within it represent a strategic opportunity to help address growth pressure not only within the corridor itself, but from other areas, including London. If this is the case then it resembles the very dialogue the Inspector into the Further Alterations was expecting to have happened to inform this Plan. But this is seems highly unlikely as strategic scale decanting of London growth beyond the Capital of this nature would be a matter of substantive strategic significance that should be a matter for a full review of the London Plan.

On balance, it seems more likely that it is a relatively small scale 'opportunistic' approach where specific significant growth locations beyond London might be able to facilitate both indigenous growth and some London growth. If such opportunities were to exist they would collectively represent a very small proportion of London growth.

The supporting text contains a diagram of the strategic infrastructure priorities in the wider south east and beyond where the Mayor states '*Some of these orbital priorities may have more capacity to accommodate additional growth than the radial ones*'.

The Mayor appears to view these transport infrastructure priorities as potentially suitable for his 'willing partners' approach. In developing these infrastructure priorities 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 wider south east political arrangements. This association needs to be removed.

The County Council calls for:

- a discussion within the wider south east political arrangements seeking clarification about what the Mayor's intentions are in relation to this section of the Plan – is it designed to commence a dialogue in relation to post 2029 scenarios;
- a redraft of the policy and supporting text to reflect that clarified position (by way of example, see below);
- the need to remove any suggestion that the strategic transport infrastructure priorities are growth priorities/corridors. Text relating to infrastructure priorities should be moved to the transport section of the Plan along with additional text about their purpose and how they are to be taken forward.

By way of example, amendments to the Plan to reflect the assumption that this is a small scale 'opportunistic' approach and removal and transfer of text relating to Strategic Infrastructure Priorities might look like the following (illustrative new text shown by underline thus and deleted text by strikethrough ~~thus~~. Paragraph numbers have not been changed):

'Policy SD3 Growth locations in the Wider South East and beyond = Willing Partners

~~A The Mayor will work with relevant WSE partners, Government and other agencies to realise the potential of the wider city region and beyond 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.~~

~~B The Mayor supports recognition of these growth locations with links to London in relevant Local Plans.~~

Where growth locations beyond London have the potential to make provision for both indigenous and some London housing and business development, the Mayor will work with willing local authority and other partners to support growth to secure mutual benefits. The Mayor will support recognition of these locations in relevant Local Plans beyond London.

2.3.1 This Plan aims to accommodate all of **London's growth** within its boundaries without intruding on its Green Belt or other protected open spaces. As with any successful urban area this does not mean that in- and out-migration will cease, but that as far as possible sufficient provision will be made to **accommodate the projected growth within London**.

~~2.3.2 To ensure a **common understanding of growth projections** across the wider region the GLA will provide regionally consistent demographic data, which takes into account long-term trends, and the~~

~~Mayor will refer to this data as part of his representations on emerging Local Plans.~~

~~2.3.3 The GLA's new **Strategic Housing Market Assessment** shows that London has a need for approximately 66,000 additional homes a year. The Strategic Housing Land Availability Assessment suggests that London has the capacity for around 65,000 additional homes a year and the housing targets in this Plan reflect this.~~

2.3.4 Despite this Plan seeking to accommodate the vast majority of London's future growth, some migration will continue. 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. There may be opportunities at specific strategic growth locations beyond London where the scale of the opportunity is such that there is potential for growth to meet both indigenous housing and business needs and a proportion of those of London. Therefore, the Mayor is interested in **working with willing partners** beyond London to explore the potential of such locations ~~if there is potential to accommodate more growth in sustainable locations outside the capital.~~

2.3.5 This **partnership work** could help deliver more homes, address housing affordability and improve economic opportunities outside London. The focus is would be on locations that are (or are planned to be) well-connected by public transport and where development can help meet local growth aspirations as well as wider requirements. Recognising that investment in public transport can often bring significant benefits to wider areas, such partnerships could focus on optimising rail capacity between London, the wider region and beyond. Another area of focus could be proposals for new/garden settlements with good links to London. Government has already indicated support for a similar approach. The Mayor could help to investigate and secure mutually beneficial infrastructure funding to unlock these opportunities.

~~2.3.6 Figure 2.15 shows London in its wider regional setting. 13 WSE **Strategic Infrastructure Priorities** have been endorsed by the WSE partners for initial delivery. Eight of these are radial priorities that connect directly to Growth Corridors within London. The remaining five are orbital priorities that can help reduce transit through London and stimulate the WSE economy beyond the capital. Some of these orbital priorities may have more capacity to accommodate additional growth than the radial ones.~~

2.3.7 Collaboration with willing partners can help alleviate some of the pressure on London while achieving local ambitions in the WSE for growth and development, recognising that this may require further infrastructure. The Mayor will work with key **willing partners**, including local authorities, Local Enterprise Partnerships, the National Infrastructure Commission and Government, to explore strategic growth

opportunities where planning and delivery of strategic infrastructure (in particular public transport) improvements can unlock development that supports the wider city region.

2.3.8 It will be important to ensure that growth in the WSE contributes to local vibrancy and economic activity at all times of the day and week, and that the scale of planned growth is proportional to public transport capacity in the area. Where appropriate, the Mayor will support for example Memoranda of Understanding to formalise **partnership agreements**/commitments between relevant authorities. Work with some individual authorities and groups of authorities in the WSE has been initiated and is being pursued further. The Mayor continues to encourage authorities outside London to become willing partners and work with the capital on opportunities for growth, where mutual interest can be achieved.

Figure 2.15 - Wider South East – 13 Initial Strategic Infrastructure Priorities

Chapter 10

Transport

Policy T3 Transport capacity, connectivity and safeguarding

A Development Plans should 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.

B The Mayor will work with relevant WSE partners, Government and other agencies to realise the potential of the wider city region and beyond through investment in strategic infrastructure to support housing and business development.

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10.3.1 The Mayor recognises the vital importance of working collaboratively with a wide range of strategic partners to achieve **good transport connectivity** within London, and also between London and the Wider South East, the rest of the UK and a global network of other cities. Figure 2.15 shows London in its wider regional setting. 13 WSE Strategic Infrastructure Priorities have been endorsed by the WSE partners for initial delivery. Eight of these are radial priorities that connect directly to Growth Corridors within London. The remaining five are orbital priorities that can help reduce transit through London and stimulate the WSE economy beyond the capital. Public transport is the most efficient means of moving people over distances that are too long to walk and cycle. London has one of the most extensive public transport networks in the world, with more than nine million trips made every day by bus, tram,

tube, train and river. Use of the public transport system has increased by 65 per cent since 2000 largely because of enhanced services and an improved customer experience.'

After paragraph 10.3.1 (as renumbered) insert Figure 2.15 – Wider South East – 13 Initial Strategic Infrastructure Priorities (as renumbered).

Waste

The Plan contains a range of ambitious policies relating, for example, to promoting a more circular economy; zero biodegradable or recyclable waste to landfill by 2026; municipal waste recycling target of 65% by 2030; construction, demolition and excavation waste recycling target of 95% per cent by 2020 and the equivalent of 100 per cent of London's waste to be managed within London (i.e. net self-sufficiency) by 2026. There are also policy and other commitments to matters such as safeguarding of waste facilities; the suitability of strategic industrial locations and locally significant employment sites/land for waste uses and the need to protect such areas from housing and mixed use development; requirement for boroughs to allocate sufficient land to waste apportioned to their areas; the need for careful design of development adjacent to waste to minimise the potential for disturbance and conflicts of use; and so on. The Plan also recognises the important work undertaken by the Waste Technical Advisory Bodies and both supports and encourages the continued working to address cross boundary issues.

These policies aspirations and commitments and commitment to joint working are very much in line with the County Council's approach to waste management and as adjacent Waste Planning Authority the County Council supports the policies, aspirations and commitments and commitment to joint working made within the Plan.

Despite these policies, London will continue to export waste, for example in the form of solid recovered fuel, refuse-derived fuel (RDF) and construction, demolition and excavation waste. Given the scale of growth and change proposed for London within the Plan, there are likely to be a challenging levels of future construction, demolition and excavation waste from the major infrastructure and regeneration projects. It will be important for London to work very closely with authorities beyond London.

The Plan states in the text supporting waste policies that London produced 324,000 tonnes of hazardous waste in 2015 and that there is a major risk of shortfall for this type of facility regionally. Given this risk, consideration should be given to inclusion within the Plan of a specific policy dealing with this issue.

The County Council is broadly supportive of the contribution made by the East of England Waste Technical Advisory Body to the East of England Local Government Association response to the consultation.

Minerals

The Plan contains policies to safeguard aggregates resources and aggregates infrastructure (including aggregates recycling, railheads, wharves), the maintenance of a landbank of land won aggregates, encouraging re-use and recycling of

construction, demolition and excavation waste within London, requirements to reduce the environmental impacts of aggregate. Such policies are in-keeping with those of the County Council and are therefore welcomed and supported as an adjoining Minerals Planning Authority.

Transport

The approach taken by the Mayor to dealing with future transportation issues within his package of Strategies, including the London Plan, is very much in-keeping with that of the County Council as a transportation authority and are broadly supported – for example:

- rebalancing the transport system towards walking, cycling and public transport, including ensuring high quality interchanges, to reduce Londoners' dependency on cars.
- strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041.
- the need 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.
- supporting the delivery of a London-wide network of cycle routes, with new routes and improved infrastructure minimum cycle parking standards, reduced parking provision, maximum car parking standards, etc.

The County Council welcomes the recognition of the need to manage transport issues across boundaries. There is a need for cross-border relationships between TfL and transport bodies and partners beyond London to be strengthened so that different modes of transport can be linked up and planned more effectively to enable the effective delivery of collective growth ambitions. Current cross boundary arrangements are incapable of delivering sensible coherent transport solutions for the wider capital region.

Table 10.1 - Indicative list of transport schemes

The County Council welcomes inclusion of Crossrail 2 (including West Anglia Main Line 4-tracking) but is extremely disappointed that the Metropolitan Line Extension (MLX) scheme is not included. MLX has very obvious local and strategic significance, including the benefits of improving sustainable transport links locally, with Central London and also across North West London. It would transform Metropolitan Line connectivity with the West Coast Mainline at Watford Junction, as well as unlocking housing development to help meet housing needs across the wider area. It is an important scheme within one of the 13 Strategic Infrastructure Priorities highlighted in Figure 2.15 - Wider South East – 13 Initial Strategic Infrastructure Priorities supported by the Mayor and local authorities in the wider south east (12. Midlands and West Coast Mainline (London - Luton - Bedford / Milton Keynes)).

The County Council, as the sponsor of MLX, is committed to working with the Mayor, Watford Borough Council, the Hertfordshire Local Enterprise Partnership, local MP Richard Harrington and central government to try and find a way to move the project forward and would welcome and calls for inclusion of the scheme within Table 10.1.

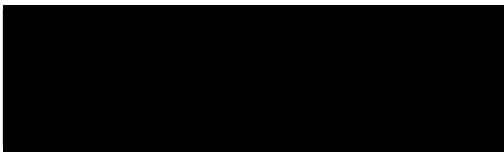
The Economy

The County Council supports the main thrust of the Plan to positively plan for the development requirements of the London economy as it changes over time. The one specific exception to this approach is in relation to industrial land. The Plan commits to the provision of a sufficient supply of land and premises in different parts of London to meet current and future demands for industrial and related functions and no net loss of industrial floorspace capacity. However, a key approach to industrial land is to encourage industrial intensification, colocation and substitution. In this context, 'substitution' includes the *'substitution of some of London's industrial capacity to related property markets elsewhere in London and beyond London's boundary'*.

The Plan is clear that this should only happen, amongst other matters, where it results in mutual advantage and full regard is given to both the positive and negative impacts. It should only be considered as part of a plan-led process of consolidation and intensification and not through ad hoc planning applications. The approach based upon mutual advantage and managed strategically is noted and the County Council welcomes the need for proper consideration of positive and negative impacts.

Thank you once again for the opportunity to comment on the emerging London Plan.

Yours sincerely,



Derrick Ashley

Executive Member for Environment, Planning and Transport