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Mr Sadiq Khan (Mayor of London)
New London Plan
GLA City Hall
London Plan Team
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Date: 28th February 2018


SUBJECT: DRAFT NEW LONDON PLAN

Dear Mayor Sadiq Khan,

Thank you for inviting Luton Borough Council to provide comments on the Draft New London Plan. Please see our representations, by topic heading, detailed below:

Luton Context

1. As the Mayor of London may be aware, Luton has recently adopted its Local Plan (2011-2031) which was prepared under the Duty to Cooperate with its neighbouring authorities over the course of a number of years. The plan sets out the spatial policies for the whole Borough including the delivery of 8 Strategic Allocations including the London Luton Airport. The Local Plan makes provision for 18,000 new jobs in the Borough with a significant level of economic growth planned for London Luton Airport,
2. Luton's Objectively Assessed Housing Need (OAN) is 17,800 dwellings. However, due to Luton's limited capacity for housing development, the Council has, under the Duty to Cooperate, agreed with its neighbouring authorities that its unmet housing needs of 9,300 dwellings will be delivered within neighbouring districts through their local plans.
3. Policy H5 of the London Plan states that 50% of new homes delivered across London should be affordable (33,000 homes annually), however this does not meet the need identified in the SHMA (43,500 homes annually), leaving a shortfall of 10,500 affordable homes. Luton's response to the 2014 FALP states that Luton has lower housing costs than the rest of the South East and so could be attractive to Londoners seeking more affordable housing in a well-connected location. The shortfall in affordable housing could therefore affect demand for housing in Luton.
4. Luton has committed to a review of the Local Plan to commence before the end of 2019 with a submission of the review for examination by mid-2021. Luton will continue



to work closely with its neighbouring authorities and will engage the Mayor of London as part of this process as the Council did in the preparation of its currently adopted plan.

Housing and Growth

5. The draft London Plan (at Policy H1 and Table 4.1) sets ambitious housing targets, requiring delivery of 65,000 new homes (net) every year for the period 2019/20 – 2028/29. This is a substantial increase over and above the adopted London Plan, which establishes an annualised target of 42,389 net new homes per year for the period 2015 - 2025. It also substantially exceeds the rate of new housing completions recently achieved across London: for the five-year period 2011/12 – 2015/16, total annual completions ranged between 28,324 and 38,553. The scale of ambition is commendable and is supported.
6. However, we express reservations as to how realistic the targets and rates of delivery are. The London Strategic Housing Land Availability Assessment (SHLAA) underpins the housing figures and distribution of these across London. However:
 - The SHLAA does not identify nor map potential housing sites and thus lacks transparency. Without this information it is impossible to verify whether the assumed potential for new development does indeed exist. Although the appendices to the SHLAA include a list of those development sites in London benefitting from some form of planning permission or existing Local Plan allocation these only make up part of the assumed supply of new development sites. It is the supply of other potential housing sites, which are neither mapped nor tabulated, where greater transparency is required. In addition, it is made quite clear that the SHLAA is not a site allocation exercise, and that instead is the responsibility of the individual boroughs through their Local Plans. It must therefore be questioned whether indeed the additional sites within the SHLAA would actually be considered acceptable at Borough level.
 - Furthermore, the SHLAA explains that estimates of development potential are based upon use of the density matrix in the adopted London Plan, with estimates based on the top of the density range for town centres and higher assumptions applied in opportunity areas reflecting recent trends. This represents a disconnect with the draft London Plan, which no longer includes a density matrix and instead, at Policy GG2 (Making the Best Use of Land), requires a design-led approach to be taken when exploring the potential of land, understanding the character of different places. This is further expanded upon in Policy D1 (London's Form and Characteristics), Policy D2 (Delivering Good Design), and Policy D6 (Optimising Housing Density). In particular, these require a design-led approach that 'optimises' development potential. To optimise development density is a fundamentally different concept to maximising development density, reflecting what is right and appropriate for an area. It is



considered inconsistent that the draft London Plan relies on evidence that is based upon an approach that is not reflective of its own policies. Rather, the estimates of potential in the SHLAA should be based upon a design-led approach as required by Policies D2 and D6. This is emphasised by evidence to the draft London Plan¹ which suggests that use of the density matrix ‘may result in inappropriate development in certain places’².

Furthermore, Policy H2 (Small sites) increases the reliance on London Boroughs to identify small sites for housing (defined in London as sites able to accommodate up to 25 homes). Over the first ten-year period of the draft London Plan, small sites are expected to contribute approximately 38% of the total housing target. Following the discussion above, it remains unclear just how realistic this is.

7. Policy H3 (Monitoring housing targets) requires net housing delivery to be monitored against the housing targets in the draft London Plan. Luton Borough Council supports the need for regular monitoring of housing delivery. However, supporting text to this Policy suggests that London should not be subject to the Government’s proposed housing delivery test if development stalls for non-planning reasons and is unable to contribute to delivery of new housing. Luton Borough Council is sympathetic to this argument. However, the Monitoring Framework and Key Performance Indicators (Policy M1 and associated Table 12.1) do not say what measures will be put in place should the housing targets not be met on a consistent basis. A proactive approach to the identification of alternative sites and opportunities, and the use of mechanisms to unblock stalled schemes would be required. Luton Borough Council is thus pleased to see reference to such an approach as outlined in paragraphs 11.1.17 to 11.1.25 of the draft London Plan, however the actions that would be taken should be made clear.
8. The concern with this for Luton is that if the housing figures in the draft London Plan are not met, for whatever reasons (e.g: London Boroughs do not allocate land for housing in their Local Plans to meet the housing figures, or that development densities achieved are lower than that assumed in the SHLAA etc), then London will be left with a ‘short-fall’. The question is thus how and where this will be made up and whether authorities influenced by the London housing market will be affected by any potential shortfall.
9. It is made clear in the draft London Plan (Policy G2) that release of the Green Belt will not be supported, but that extensions to it will. Any further housing development would thus need to take place beyond London, potentially in places such as Luton. The Borough Council would need to have the opportunity to plan appropriately for any additional growth and or burdens arising from non-delivery against the draft London Plan housing targets.

¹ GLA Density Paper 4, Exploring Character and Development Density


² *ibid.* Section 2.5



10. As part of Luton's previous representation to the FALP, we recommended that the GLA undertake a comprehensive Green Belt Review. It is requested once again that as part of the draft London Plan, a review of the Green Belt is undertaken such that the GLA and its partners can better understand the real potential for housing delivery in London. This is particularly pertinent given the identification of the Growth Corridors on Figure 2.1 (The Key Diagram) and Policy SD1, which extend into and through the Green Belt. Linked to this is supporting text to Policy SD3 (Growth Locations in the Wider South East and Beyond) which acknowledges that although the draft London Plan seeks to accommodate projected growth, the impact of ongoing patterns of migration, barriers to housing delivery and potential future changes in projections means it is prudent to explore the potential for accommodating more growth in sustainable locations outside the capital.
11. Luton is considered a sustainable location, well linked by rail and with a growing airport and economic base. Luton Borough Council does and will continue to work with the GLA on cross-boundary regional planning matters. Like the London Mayor, Luton Borough Council acknowledges the impact of population movement to and from London, as well as commuting patterns, and continues to investigate this through its SHMA / OAN. However, Luton, like other boroughs and districts in the 'Wider South East' region outside of London, also has constraints which impact on the delivery of new housing and economic development. In Luton, these include, amongst others, the Green Belt, as well as the Chiltern Hills AONB. The Luton Local Plan has recently been adopted and, as part of this, a review of the Green Belt was conducted in line with guidance set out in the NPPF. Similarly, Luton Borough Council requests that the GLA, in association with the Green Belt boroughs in London, undertakes a full review of the Green Belt boundary to consider what opportunities exist for additional, sustainable growth locations in London before exploring opportunities further afield.

Aviation

12. Policy T8 (Aviation) of the draft London Plan makes clear the London Mayor's opposition to expansion of Heathrow Airport. However, the same Policy acknowledges that additional aviation capacity is required in the South East, and that this is 'crucial to London's continuing prosperity and to maintaining its international competitiveness and world-city status'. This is related to a number of other policies in the draft Plan, including for example, Policy E10 (Visitor Infrastructure), which seeks to promote the tourism industry across London. More pertinently, this is directly related to Policy GG5 (Growing a good economy) which seeks to enhance London's global economic competitiveness.
13. Luton Airport is an international gateway to the Capital and is recognised as a 'London' airport. The Airport is owned by Luton Borough Council, who is supportive of expansion. Indeed, proposals have been submitted that have the potential to create



an 80% increase in passenger capacity and help deliver more than 9,000 new jobs by 2028. Longer term, the vision for the Airport is to increase passenger capacity from 18 million passengers per annum (mppa) to 36-38 mppa between 2020 and 2050.

14. Luton Borough Council thus supports the Policy approach in the draft London Plan to increasing airport capacity in the South East. Luton Borough Council is pleased to see reference to Luton Airport in paragraph 10.8.7 of the draft London Plan, although this somewhat underplays the potential of the Airport and the Council's commitment to growth and investment.
15. Policy T8, and supporting text to this, also note the importance of providing improved surface access links, particularly rail, to and from airports, and that existing schemes, such as Thameslink, should not be relied upon to cater for additional growth. The London Mayor calls for 'major investment by the airport authority and central Government in new infrastructure'. Luton Borough Council supports this stance. However, the GLA also has a significant role to play and, as set out in Policy SD2 and SD3, will need to collaborate with partners and explore ways to help fund and deliver strategic infrastructure which are of benefit to London.
16. It is clear that Luton Airport, in its current form, and with the potential for expansion, is central to the ongoing growth and prosperity of London. It is therefore important that references to the use of the Mayoral Community Infrastructure Levy in Policy T9 (Funding transport infrastructure through planning) in the draft London Plan are strengthened. Clause 'A' of Policy T9 suggests that this will 'potentially' be used to secure funding to other strategic transport infrastructure (i.e.: other than Crossrail 2). Luton Borough Council suggests that the word 'potentially' is removed from this clause.

Infrastructure

17. Figure 2.1 (The Key Diagram) of the draft London Plan identifies 'High Speed 2 / Thameslink' as a growth corridor, which 'links beyond London's boundaries into a Strategic Infrastructure Priority', identified on Figure 2.15 (Wider South East – 13 Strategic Infrastructure Priorities) as the Midlands and West Coast Mainline (London – Luton – Bedford / Milton Keynes).
18. Policy SD2 (Collaboration in the Wider South East) signals the intention of the London Mayor to work with partners to address regional and sub-regional challenges, including, for example, finding solutions to housing and infrastructure delivery. Policy SD3 goes further and states that the London Mayor will work with partners to help realise the potential of growth locations in the wider South East, particularly where there are mutual benefits for London. Linked to this is Policy T3 (Transport capacity, connectivity and safeguarding) which, in Clause 'A', makes clear that '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’.

19. The ‘Luton Investment Framework’, produced by Luton Borough Council, sets out a £1.5 bn, 20-year plan for transformation to take place within the town. The development of London Luton Airport is a cornerstone to this plan.
20. London Luton Airport is planning to build a new £200 million Direct Air to Rail Transit system (Luton DART), which will provide a fully automated driverless train link between London Luton Airport and Luton Airport Parkway (in which the latter is served by direct services from London St Pancras International). Currently, a bus service provides a direct link between London Luton Airport and Luton Airport Parkway.
21. Luton Borough Council are keen to promote sustainable growth as part of the Luton Investment Framework and acknowledge that part of the catchment for the London Luton Airport will be the London Boroughs. Currently, there are infrequent ‘fast’ train services (about one train per hour) between London St Pancras and Luton Airport Parkway, which are those services with a travel time of approximately 20 minutes. Most train services exceed 30 minutes in travel time and therefore Luton Borough Council consider that this does not provide a realistic or feasible alternative to car travel.
22. In accordance with the aims of Paragraph 10.1.1 of the draft London Plan and those of the Luton Investment Framework, Luton Borough Council would like to see a commitment to increase the number of fast train services between London St Pancras International to London Luton Airport to four per hour. However, Luton Borough Council are keen to ensure that services to Luton Station in the town centre are also improved and not affected by any proposed increase in services from London St Pancras to Luton Airport Parkway.
23. Luton Borough Council is supportive of this policy approach in the draft London Plan and is keen to work with the London Mayor to secure infrastructure funding that will help optimise rail capacity between London and Luton, as well as other strategic infrastructure items required to help deliver growth. This has added emphasis given the approach to airport capacity, future growth of London Luton Airport and associated housing, economic and movement pressures.

Waste

24. Luton Borough Council has reviewed Policy S18 Part A 1) of the draft London Plan; which identifies an ambitious target of the equivalent of 100 percent of London’s waste should be managed within London by 2026 (a net self-sufficient arrangement). Paragraph 9.8.1 of the draft London Plan notes that in 2015, London managed 7.5 million tonnes (mt) of its own waste and exported 11.4mt, while also importing 3.6mt.



This gives a waste net self-sufficiency figure of approximately 60%. Of this exported, 5mt (49%) went to the East of England, of which 2.9mt (58%) of this exported figure went to landfill.

25. Luton Borough Council notes the 'Waste Forecasts & Apportionments – Task 1' report produced by SLR. While there has been reduction in per capita waste generation since 2000, overall waste produced by the London Boroughs at household levels has been modelled to increase in most scenarios, as identified in Figure 2-5. The modelled scenarios for commercial and industrial waste also show projected increases, however it is of note that the scenarios vary widely within this category. It is also not immediately clear why there has been such a sharp drop in waste produced by the London Boroughs prior to the 2008 Financial Crash, a trend which began in late 1990s/early 2000s and began to reverse in the last few years.
26. Luton Borough Council are interested in the draft London Plan's position on waste given that three landfill sites located within Central Bedfordshire Waste Planning Authority have reported receiving waste which originated from London (as noted in Table D1 of 'Waste Forecasts & Apportionments – Task 2').
27. Policy SD2 of the draft London Plan identifies the commitment to collaborate with partners across the Wider South East including to meet the duty to co-operate and lists a number of shared strategic concerns including waste management. Paragraph 9.8.3 recognise that the flow of waste does not respect borders. Policy S18 of the draft London Plan requires boroughs to allocate sufficient land and identify waste management facilities to provide the capacity to manage the waste arisings. However, there does not appear to be any mechanism for co-operation beyond the London Boroughs on this matter.
28. Luton Borough Council would like to see a commitment and mechanism included in the draft Local Plan for co-operation on future waste apportionment to WPAs outside of London, given the current levels of export of waste to areas outside of London. While Luton Borough Council supports the ambitious target for 100 percent net self-sufficiency in waste (as stipulated in Policy S18 Part A 1), it also acknowledges that this target may not be met and there would need to be an appropriate mechanism or review process if this reality came about.

Summary

29. Luton Borough Council commends the draft London Plan. It is an ambitious, wide-ranging and comprehensive document. However, concern is expressed with regard to the following areas:



- The housing targets (Policy H1) are extremely challenging and the approach to estimating these is questionable. Greater certainty is required as to whether this scale of growth can realistically be delivered, particularly given past performance.
- Alternative approaches and mechanisms need exploring to help facilitate and unblock development should delivery not come forward as anticipated.
- A full review of the London Green Belt (Policy G2) should be undertaken to identify how and where London can meet the housing need it is generating.
- The ambitious waste target, as identified in Policy S18 Part A 1), has a risk of not being met; given the scenarios for waste generation in London largely show some form of increase in overall waste produced.

30. Luton Borough Council is supportive of the approach to aviation (Policy T8) and strategic infrastructure. The Borough Council welcomes ongoing collaboration with the London Mayor to help best secure infrastructure investment, including increasing the frequency of 'fast' train services to London Luton Airport.

Yours Sincerely,

Cllr Paul Castleman

Portfolio Holder for Place and Infrastructure

Luton Borough Council