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Sadiq Khan (Mayor of London)
New London Plan
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London Plan Team
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Dear Mr Khan

The London Plan: The Spatial Development Strategy for Greater London - Draft for Public Consultation (December 2017)

Thank you for inviting Swale Borough Council to comment on the draft London Plan.

We recognise the key role of London and its impact on regional and national development and wish to be fully engaged with the plan process. We are particularly concerned to ensure that development is delivered in the most effective and sustainable way and that appropriate supporting infrastructure is funded and provided in a timely manner.

Our detailed policy comments are at Appendix I to this letter, but we should also like to make the following general points.

Whilst we acknowledge the position of London and WSE as the 'engine room' of the UK economy, we do question whether continuing to cram more development into the WSE will not simply lead to overheating and potentially lack of competitiveness in comparison to other regions. We therefore advocate the need for more positive inter-regional planning to relieve pressure within the region.

Swale has recently (July 2017) adopted a Local Plan to fully meet its own assessed housing needs and has already embarked on a major review to address the challenges of the new HCLG housing figures; and to address the delivery of infrastructure needed to support these unprecedented development requirements beyond 2022.

We understand that the HCLG housing need assessments (based on population projections) already allow for migration from London to Wider South East (WSE) districts. We are therefore very concerned that the challenge for Swale (and other Kent districts) from additional population flows is likely to impact upon us.

Increased migration into the area is fuelling housing demand from London commuters. This has the effect of pricing local people and affordable housing out of the local markets. In turn this impacts on available labour for the local economy and affects its competitiveness. It would be far from a satisfactory or sustainable development strategy

to see WSE and districts such as Swale located in the Thames Estuary Corridor as simply dormitory areas to receive overspill housing and we would certainly wish for a more balanced perspective when the Thames Estuary Commission resumes work this year.

Swale's own local planning process has identified the need for unprecedented funding challenges for transport and social infrastructure to support development already planned for. It is highly likely that the increased pace of growth we are being asked to accommodate, plus potentially that from London is likely to outpace delivery of that infrastructure, despite the fact that we are working closely with infrastructure providers and funders to deliver it. This is not just the regional / national scale projects identified in your draft plan, but also local schemes which are now necessary if they are not to constrain growth and make the quality of life intolerable for both current and new residents and businesses.

Despite planning for identified need, delivery of new development on the ground has been slow, particularly in areas with more challenging viability. This is compounded by the fact that the construction industry is focusing its overstretched resources on those areas which are most profitable. We query whether the industry has the capacity to deliver this scale of development in a consistent and sustainable way across the WSE.

The scale of development which is now facing Swale and many WSE districts means that finding suitable sites to deliver growth sustainably is increasingly challenging, with more sensitive and constrained greenfield sites now having to be considered for built development. We consider that this is incompatible in sustainability terms with the prescriptive approach to non- review of Green Belt and other open spaces within the London Plan. Forcing housing demand to 'jump' the Green Belt into WSE districts is unsustainable both in terms of its direct impact on the environment and forcing ever longer commuting journeys and adding further strain on overloaded transport networks.

We appreciate that the draft London Plan leaves cross boundary issues between London Boroughs and London Boroughs and WSE districts to be discussed between the relevant councils. However, we would suggest that whilst no one plan is likely to be able to have a strategic scale effect, the cumulative effect of all these actions is capable of having an important impact. Swale has been represented at the WSE Summits, where we have been meeting informally to discuss common strategic planning and economic growth issues. We would therefore support the Kent Leaders call to explore the setting up of a London – Kent working group to ensure that we are working together to coordinate strategic policy and infrastructure investment more effectively across London and Kent.

We look forward to working further with you as the London Plan continues to develop.

Yours sincerely



Andrew Bowles
Leader of Council

Gerry Lewin
Cabinet Member for Planning

Appendix I

Draft London Plan (December 2017): Swale Borough Council Detailed Responses

London Plan para / Policy No.	Swale BC Comment	Notes
Policy GG 2/ para 1.2.1	Conditional Support	<p>The Mayor seeks to accommodate rapid growth of 49,000 jobs per annum and 65,000 dpa (out of a need for 66,000dpa) through creating places of higher density and mixed land uses where local facilities and amenities are within walking distance. Whilst a practical and ambitious approach, we note that this includes intensification of land use in outer London which will be 'pro-actively explored. Given the intention not to review Green Belt and Metropolitan Open Land, we query how effective this will be in delivering the targets. Policy GG4 and Policy H2 also indicates a heavy reliance on small sites, and we question the certainty of delivery from such sites, given the scale of need.</p> <p>As London is also a major focus for commuters, we question whether encouraging job growth on this scale is sustainable in the context of the WSE as it will encourage additional growth in commuting journeys from beyond the Green Belt. Green Belt Review appears a necessary component of this (see comments on Policy G2).</p> <p>Whilst some of these principles can be supported we are unconvinced as to whether it is sustainable or deliverable. The Plan needs to provide further evidence of how these objectives will be delivered.</p>
Policy GG5 /para 1.4.8	Conditional Support	<p>At Para 1.4.8 the Mayor acknowledges the contribution of WSE to the London and UK economy, but the means by which this will be promoted is not spelled out clearly in Policy GG5 (cross referencing other relevant policies may be helpful in this).</p>
Policy SD2 Collaboration in the WSE	Conditional Support	<p>The principle of a policy on collaborative working with WSE partners is to be supported. However, greater clarity is required on how Policy SD2 will be applied in practice.</p> <p>To date there has been no attempt to identify or establish working relationships with districts who could be potential willing partners for growth, or how the Mayor intends to work with WSE partners on regional challenges and shared strategic concerns.</p>

		<p>The Mayor should explain further how he will implement the aim of Policy SD2 Clause B for 'consistent technical evidence'. GLA have already created their own demographic projections (para 2.2.9) and development targets on a different basis to non London authorities. This already creates a conflict with national policy for WSE authorities in progressing their own local plans, as they will not be able to be in accordance with the London Plan and national planning policy. This is not effective and risks unsoundness.</p> <p>To ensure that joint working can progress and remains constructive, more could be said on how the Mayor will respond in terms of the Duty to Cooperate which district local planning authorities are required to observe. Since it is unlikely that any individual local plan in WSE would have a significant impact on delivery of targets and the strategic planning of London, we would expect that the Mayor's comments on any such local plan would be proportionate and appropriate.</p>
Policy SD3 Growth Locations in WSE and Beyond Fig 2.15	Conditional Support	<p>Para 2.3.4 -5 references the need to work with willing partners outside London to explore the potential for accommodating growth in more sustainable locations outside the GLA area. Recognition of joint working and exploration potential mutual benefits can be supported.</p> <p>However, the focus is on locations which are or could be well connected by public transport and / or proposals for new settlements. Figure 2.15 focuses on 'initial' radial transport infrastructure corridors for improvement.</p> <p>Further detail needs to be written into the plan on how this could operate, as Swale, in common with many other districts are struggling to accommodate their own growth targets and ensure that there is adequate supporting infrastructure (as evidenced for example by the Swale Local Plan Implementation and Delivery Schedule 2017 and the draft Kent Growth and Infrastructure Framework 2017. Few districts will be able to accommodate additional growth from London, without major contributions to necessary infrastructure. Some of this may not necessarily be of a regional scale of importance, but is none the less vital, and all the more difficult to achieve in areas where viability is much more challenging than London.</p>
Policy H1 Increasing Housing	Object	<p>Para 1.4.4 notes that ten-year housing targets have been developed for all London Boroughs and are to be used as the basis for their development plan</p>

<p>Supply/ Table 4.1 (also para1.4.4) Increasing Housing Supply</p>		<p>documents and are not required to take note of nationally derived local need figures. No explanation is given for this and immediately creates a discrepancy in the evidence base between London and WSE for gauging housing need and targets in development plans. Para 4.1.7 states that the targets are based on a pan-London Strategic Housing Land Availability Assessment, rather than the Strategic Housing Market Assessment including demographic change specified at para159 of the NPPF. This will no doubt be exploited by developers, to the detriment of authorities preparing local plans both within and outside London.</p> <p>The housing target of 66,000dpa is only identified for the first ten years of the plan period (to 2029). There is no indication of what the target may be beyond this date or how and where they would be met for the remainder of the Plan period to 2041. Local planning authorities will be looking beyond 2029 in their own local plans (Swale's currently adopted plan already goes to 2031).</p> <p>During the preparation of the London Plan, the Mayor's officers have briefed WSE authorities that there was likely to be a significant shortfall in housing land supply within London against identified need. Whilst the shortfall appears to have been held at 1000 dwellings per annum, this is on a much larger housing target than in the adopted London Plan. The identified shortfall of 1000 dpa, still amounts to 10,000 dwellings over the lifespan of this target. The shortfall is likely to be even larger if London planning authorities are required to take on board the new HCLG methodology for calculating need. For London this is 72,000dpa. This would imply a very significant shortfall in the provision of this plan and begs the question of where, when and how this may be expected to be addressed.</p> <p>We therefore question the overall deliverability of even the proposed target, especially when coupled with the rigid approach to Green Belt and open space policies and the specifications for delivery from small sites. A less prescriptive approach may enable the London Boroughs to seek more pragmatic and sustainable solutions.</p> <p>The uncertainty around the veracity of the target itself and London's ability to deliver it could have a knock on effect to WSE authorities who are struggling to meet extremely challenging adopted (and likely</p>
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		prescribed HCLG targets of their own), not least in terms of potential for disruption of the plan making process and their ability to deal with plan led development and infrastructure.
Policy H5 Affordable Housing	Conditional Support	<p>There are concerns if London does not achieve its overall housing targets; or achieve the affordable targets within those market sites which are delivered, there could be repercussions for districts outside London. If land in Swale is utilised for London affordable housing provision, this could reduce local development opportunities and thus the provision of affordable homes to Swale residents. Swale has problems of homelessness and with pockets of deprivation. With the London policy requirement (H5) to provide 50% of new build as affordable, failure to provide it within London could have potential impacts on public services, including the Housing Options Team. There is currently limited cross boundary partnership working with London authorities and we would be concerned about the impact on already overstretched public services including health, education and social services.</p> <p>The London Plan must therefore 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 a reasonable vicinity of their area to avoid significant migration into Kent and potential for further overloading of stretched public services.</p>
Policy G2 London's Green Belt	Object	<p>The need for appropriate protection of the Metropolitan Green Belt is recognised. However, a London plan which is rigid and does not allow for flexibility at the level of London Borough plan making, risks an increase in pressure elsewhere, especially the non- London Green Belt authorities. The latter are facing GB reviews in their own local plans to accommodate massive increases in development targets.</p> <p>This could well result in the release of land with higher landscape or biodiversity value than some of the degraded sites the Mayor notes to be retained. Rigid retention of all London MGB land is also likely to have the effect of displacing development pressure to districts beyond the MGB, where again land of significant environmental value recognised in Local Plan policy is already coming under pressure. We would query whether this is the most sustainable option in environmental terms across London and WSE.</p>

		<p>Retention of all London MGB and displacement of housing development pressure to WSE is also likely to increase the number of commuters facing longer journeys into London which is unsustainable in itself and places more pressure on already overburdened transport systems.</p> <p>We consider that a less prescriptive approach enabling the London Borough's to review MGB where appropriate, would be more realistic and ease this pressure.</p> <p>We would also question whether the Mayor's approach on this matter responds effectively to para.84 in the NPPF which states:</p> <p><i>84. When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.</i></p> <p>We should expect to see evidence from the Mayor's office on this matter.</p>
Policy G3 Metropolitan Open Land	Object	<p>Whilst we note that the concept of Metropolitan Open Land has been established in previous London plans and some of it has significant environmental and or heritage value, we would query what basis there is to afford it similar policy protection as MGB.</p> <p>All of the issues raised for Policy G2 apply with such a prescriptive approach.</p>
Policy G4 Local Green and Open Space	Object	<p>Whilst not quite as prescriptive as Policy G3, we query whether it is internally consistent, with Clause A appearing to preclude any loss, whilst the rest of the policy does imply that it could be considered. If Clause A prevails, then all of the points made in respect of Policy G2 and G3 apply.</p>
Policy T3 Transport Capacity, Connectivity and Safeguarding	Conditional Support	<p>The principles of this policy are supportable. However, no detail is supplied beyond the nominated regional scale schemes in Fig 2.15. The fact remains that districts outside London are struggling to accommodate their own growth targets and ensure that there is adequate supporting infrastructure (as evidenced for example by the Swale Local Plan</p>

		Implementation and Delivery Schedule 2017 and the draft Kent Growth and Infrastructure Framework 2017. Few districts will be able to accommodate additional growth from London, without major contributions to necessary infrastructure.
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