

Thurrock Borough Council comments

Page: [Draft New London Plan](#)

Section: [N/A](#)

The draft new London Plan (draft London Plan) is ambitious and if delivered could achieve positive outcomes for both London and the Wider South East, and is thus broadly welcomed by Thurrock Borough Council.

The draft London plan sets out an aim to accommodate all of London Growth within its boundary and this approach is supported. As a package of strategies, approaches and policies, the Plan is proactive and comprehensive, however there remain some challenges and uncertainties arising from the current draft Plan, and Thurrock Council has submitted a number of detailed comments and recommendations for policies and supporting text.

Page: [Chapter 1 Planning London's Future \(Good Growth Policies\)](#)

Section: [N/A](#)

Thurrock Council is generally supportive of the spatial strategy, objectives and many of the policies in the draft London Plan. There is particular endorsement of the principle of "Good Growth" and the six core Good Growth policies set out in Chapter 1. - Policy GG1 Building strong and inclusive communities; Policy GG2 Making the best use of land; Policy GG3 Creating a healthy city; Policy GG4 Delivering the homes Londoners need; Policy GG5 Growing a good economy; and Policy GG6 Increasing efficiency and resilience.

Page: [Chapter 2 Spatial Development Patterns](#)

Section: [N/A](#)

Chapter 2 - Growth Corridors

Chapter 2 of the draft London Plan includes reference to Growth Corridors and Opportunity Areas. However whilst the approach to Opportunity Areas is set out in Policy SD1 and detailed in the following pages of the chapter there is limited reference to the function and purpose of Growth Corridors. The Growth Corridors are identified in Figure 2.1 and referenced in paragraph 2.1.6 without explanation of their function in relation to the spatial strategy of the London Plan. It is suggested that additional wording is included in supporting text to define the role and purpose of the Growth Corridors.

Page: [Policy SD1 Opportunity Areas](#)

Section: [N/A](#)

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Page: [Policy SD2 Collaboration in the Wider South East](#)

Section: [N/A](#)

Policy SD2 - Collaboration in the Wider South East (and supporting text)

Support is given to Policy SD2 which sets out in the policy the principle of the Mayor working in Collaboration with the Wider South East. Reference is made to the WSE collaboration arrangements which complement the Mayor's duty to inform and consult.

Elected members and officers from the East of England authorities 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. Thus, enshrining in policy continued co-operation across the WSE on this range of topics is welcomed.

Page: [Policy SD3 Growth locations in the Wider South East and beyond](#)

Section: [N/A](#)

Policy SD3 – Growth Locations in the Wider South East and beyond (and supporting text)

The purpose and intention of Policy SD3 of the draft London Plan and its supporting text is not clear. It is considered that the Mayor should provide further clarification on this matter through revisions to the plan.

Within Policy SD3 the Mayor commits to working with relevant WSE partners, 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 where there are relationships to London, although the title of the Policy suggests this is about growth locations beyond London. The Mayor also supports recognition of these growth locations in local plans.

However whilst the wording of the policy supports strategic infrastructure and growth locations outside London the supporting text seems to focus upon issues relating to the delivery of housing growth. In the supporting text it sets out 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 supporting wording seems to suggest the possibility of locations beyond the capital being suitable to accommodate not only growth generated there, but also some of London's growth. The willing partners approach referred to in the text appears to relate to longer term contingencies, though longer term is not defined. It is unclear as to whether any willing partners have actually been identified at present and what level of potential London housing growth is assumed could be delivered by such an approach longer term.

It is noted that Councils in the East support the draft plan's recognition that collaboration can realise the potential of the city region and beyond through investment in strategic infrastructure and the mutual benefits this brings for London and partners to support housing and business development.

However the Mayor's approach on how these stronger partnerships can be brought forward in a way that supports the success of the WSE as a whole remains unclear, and moving forward, any such discussions with relevant partners need to be as part of an agreed process that is transparent and provides mutual benefits to London and localities outside of London's boundaries.

In illustrating London in its wider regional setting the supporting text and figure 2.15 identifies the thirteen WSE Strategic Infrastructure Priorities that have been endorsed by the WSE partners through the WSE Political Steering Group and Summits. It appears that the Infrastructure Priorities are regarded by the Mayor as corridors or Locations for Growth. However in developing these infrastructure priorities the authorities beyond London have been clear that their purpose is to identify infrastructure priorities, which whilst supporting growth, should not necessarily be considered as growth corridors in themselves. Such an approach would take them beyond the scope agreed within the Wider South East political arrangements. The text in the policy and the wording of paragraph 2.36 of the plan should be amended to clarify that these are transport infrastructure priorities and it should not be assumed that they are all growth corridors/locations for growth as implied by the current wording of the text.

Policy H1 – Increasing housing supply (and supporting text)

The draft London Plan states that the housing growth is to be delivered by maximizing development opportunities on brownfield sites, focusing development in Opportunities Areas, optimizing housing density, intensification within town centres and in Outer London and enhancing the supply of provision from mixed use development, and small sites. It is noted this supply of housing growth is to be achieved without the release of London's Green Belt.

Whilst the draft London Plan covers the period up to 2041 and contains an ambitious 10 year housing supply, it is less clear across the plan policies as to what will happen with housing delivery and provision longer term (2029-2041).

The draft London plan identifies an annual need for 66,000 dwellings per annum based upon evidence of the London Strategic Housing Market Assessment 2017. The draft London Plan Policy H1 makes provision to accommodate most of the identified annual housing need with an annual London housing target based on capacity of 65,000 dwellings per annum for the first ten years of the plan 2019-2029 and also expressed as an overall ten year target. The overall annual housing target is also apportioned as a target to each of the London Borough based on their site capacity. These overall London and borough housing targets are derived from the capacity identified in the London SHLAA 2017. Policy H2 identifies the proportion of this provision that should be delivered from Small Sites within each borough. However the plan policies do not refer to how housing provision should be provided post 2029.

The last version of the London Plan (the FALP) included detail within the housing policies that London Boroughs should regard the housing targets as a minimum and where local plans went beyond the ten years then the annual borough housing target should be rolled forward beyond the ten year period.

However the current draft London Plan housing policies remain silent on what happens beyond ten years. It is acknowledge that this new London Plan proposes a significant uplift in housing delivery and that it may not be a simple case of rolling forward the housing target for each London borough. However as the proposed housing policies do not address the longer term it creates significant uncertainty as to the future provision of housing in London and this has potential implications for authorities in the Wider South East. Authorities adjoining London such as Thurrock could come under increasing pressure to accommodate the longer term housing needs of London in their local plans.

It is noted from the evidence base (the 2017 SHMA) and supporting text relating to the Policies GG4 and Opportunity Areas that some additional housing capacity has already been identified in London post 2029. However it is recognized some of this capacity may be subject to significant future infrastructure provision such as Crossrail 2.

In order to give greater certainty to the longer term provision of housing in the draft London Plan it is considered that the Policy H1 should be more positive in its wording on this matter and contain an additional section that sets out the potential sources of housing capacity and supply post 2029 within London. Furthermore the policy should include the measures to be taken to bring this supply forward including the need to undertake an early review of the London Plan and evidence base.

Further policy clarification is also required from the Mayor of his intentions in the draft plan with regard to the 1,000 homes per annum that it would appear are not being met in the first ten year period.

The draft London plan and evidence identifies a need for 66,000 dwellings per annum and includes policies and targets based upon capacity to deliver 65,000 dwellings per annum. The current London Plan (FALP) contains policy wording to encourage boroughs to exceed plan targets in order to meet the shortfall of identified need. The current draft plan contains no such wording and there is no clarity on how the shortfall of 1,000 dwellings a year should be met. The new London Plan should include policy wording that encourages boroughs to exceed targets where possible and clarify the other measures required to address the shortfall.

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 across London it would seem prudent for the plan to set out contingency measures for the possibility of housing delivery failure and the plan should be clearer in terms of what would happen if delivery targets are not met.

It is suggested that the Mayor of London commit to a review of the London Plan, along with an appropriate trigger point if housing delivery fails. With the right monitoring frameworks and appropriate policy wording to set out appropriate contingencies/actions in the event that delivery falls short of housing and infrastructure 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.

Page: [Chapter 6 Economy](#)

Section: [N/A](#)

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)

Policies within the draft London Plan (E5, E7 and E8) refer to the potential of relocating some employment to the Wider South East Region and collaborative working with authorities outside London on this matter. At the Wider South East Summit in 2018, the Mayor referred the example of Royal Opera House’s linkage to Thurrock and the Deputy Mayor agreed to joint research on the location of firms. Thurrock Council welcomes the recognition of the wider economic impact and linkages of London to the surrounding areas and would welcome ongoing collaboration with the Mayor on this matter including potential mutual benefits of the relocation of businesses from London.

Page: [Policy E8 Sector growth opportunities and clusters](#)

Section: [N/A](#)

Policy E8 Sector Growth and Clusters (and supporting text)

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 for London. It is considered 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 skill and training.

Page: [Policy S17 Reducing waste and supporting the circular economy](#)

Section: [N/A](#)

Policy S17 – Reducing waste and supporting the circular economy (and supporting text).

Thurrock Council welcomes the general approach of the waste policies in the draft London Plan. However there is concern about the discrepancy between the aspirational approach of the policies and the way they are implemented. A clearer approach to implementation and monitoring is also required to ensure that the aims and targets of the policies are met.

The wording used in the draft plan is confusing and needs to be more consistent including the definitions of “managing” waste, “net self-sufficiency” and what is meant by the “export” of waste. Clarity is needed as to whether net self-sufficiency includes inert and hazardous wastes. The definition of MSW used is unhelpful since it includes C&I waste. Commercial and in particular Industrial waste are not always clearly identified in the policies.

The amount of waste to be exported to 2026 is shown in table 9.3. However it is noted from the table, that a greater amount of waste is forecast to be exported in the years until then compared to the FALP and that the export of CD&E waste is not planned for.

The draft London Plan sets a target of 95% recycling of Construction, Demolition and Excavation waste (C,D&E) by 2020. However, the supporting text states that the reliability of C,D& E data is low. There remain concerns about the amount of C,D&E waste that is exported from London to authorities such as Thurrock and in particular the potential increase of Excavation waste over the plan period and linked in particular to arising from the major infrastructure and regeneration projects.

The London Plan should identify strategic sites for the management of CD&E waste since large sites are needed to achieve this effectively. Encouragement should be given to the maximum level of recycling of C,D&E waste on site wherever possible, in accordance with the “excellent” BREEAM standard. In addition, the Plan should further acknowledge that London will not be self-sufficient in the management of excavation waste and that work will need to take place with other WPAs to identify sustainable waste management solutions.

The Plan should also state that the Mayor will expect the promoters of major projects to propose solutions to the disposal or recovery of excavation waste generated by their projects.

Page: [Policy SI8 Waste capacity and net waste self sufficiency](#)

Section: [N/A](#)

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The draft London Plan contains a policy that “the equivalent of 100 per cent of London’s waste should be managed within London (i.e. net self-sufficiency) by 2026”. This is the same approach and target date as in the adopted FALP (2014).

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The Plan should also state that the Mayor will expect the promoters of major projects to propose solutions to the disposal or recovery of excavation waste generated by their projects.

In Paragraph 9.8.4 the attempt at a definition of what it means for waste to be managed in London is very welcome, since this has been the subject of debate in the past and the provision of transfer stations have been considered to be sufficient to constitute “management” of waste. However, the third bullet referring to sorting and bulking of material is ambiguous and should be re-drafted to clarify that management of waste involves some activity that changes the nature of the material to make it easier to process further or that brings it to end-of-waste status.

Policy S18 A (2) states that existing waste management sites should be safeguarded, which is welcomed. However, it remains the case that waste management sites continue to be redeveloped for higher value uses and monitoring of this policy should be carried out to ensure that the policy is implemented. Strategic industrial locations and locally significant employment sites/land that are considered suitable for waste uses should also be safeguarded in order to ensure that the policy for London to achieve net self-sufficiency in waste management is effective.

Table 9.3 identifies that there will be no exports of household and commercial and industrial waste by 2026 and this is welcomed. However, this is contradictory to Paragraph 9.8.2 which states that zero biodegradable or recyclable waste will be sent to landfill by 2026. This latter paragraph assumes that waste will be exported after 2026 in the form of residual waste requiring final disposal to landfill. The plan should be consistent and these contradictions resolved. If residual waste is to be exported, the quantity involved should be calculated and included in the Plan. This will enable the receiving authorities to plan for the disposal of such material.

Page: [Chapter 10 Transport](#)

Section: [N/A](#)

Transport

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, it is suggested that the Mayor of London would benefit from supporting partners outside of London in key strategic projects and ensuring that there is meaningful engagement on transport beyond its borders.

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

There is a need for cross-border relationships between TfL and transport bodies and Councils in the East of England such as Thurrock, to be strengthened so that different modes of transport can be linked up and planned more effectively in advance to enable the effective delivery of the growth 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, the Mayor of London is asked to collaborate with councils in the East including Thurrock and also wider partners to make the case for expanding road and rail capacity both within and outside of London.