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## **Introduction**

The proposed new draft London Plan was published for consultation in December 2017. The consultation period runs until 5pm on Friday 2<sup>nd</sup> March, after which the Plan will be subject to an Examination in Public (EiP). The EiP will be led by an independent panel who will review all consultation responses and decide which issues should be discussed at EiP, as well as who will be invited to participate in individual hearings and sessions during the EiP.

This paper presents a draft response to the London Plan prepared on behalf of Uttlesford District Council. It focuses primarily on those matters of relevance to and which may have implications for the district of Uttlesford.

## **Housing and Growth**

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.

The London Strategic Housing Land Availability Assessment (SHLAA) underpins the housing figures and distribution of these across London. We note the following:

- The SHLAA does not identify nor map potential housing sites. Without this information, it is not possible to verify which sites are considered to have potential for new housing development, or where. 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 Plan<sup>1</sup> which suggests that use of the density matrix 'may result in inappropriate development in certain places'<sup>2</sup>.

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.

Policy H3 (Monitoring housing targets) requires net housing delivery to be monitored against the housing targets in the draft London Plan. Uttlesford District 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. Uttlesford District 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. Uttlesford District 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.

The concern with this for Uttlesford 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. In particular, the housing market in Uttlesford is influenced by London's housing market and thus need in Uttlesford will be affected by any shortfalls in London. This needs to be considered and planned for at the

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<sup>1</sup> GLA Density Paper 4, Exploring Character and Development Density

<sup>2</sup> *ibid.* Section 2.5

strategic level. This is emphasised by inclusion of Uttlesford within the 'London Functional Urban Area'<sup>3</sup>.

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. Uttlesford District Council is suggesting that as part of the draft London Plan, a review of the Green Belt is undertaken, especially focussing on those parts of the Green Belt that have good access and proximity to London, 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. Given current linkages between Uttlesford and London, by rail and the strategic highway network, it is essential that Uttlesford District Council has the opportunity to work with the GLA on cross-boundary, regional planning matters including in particular matters relating to the London Stansted Cambridge growth corridor.

Like the London Mayor, Uttlesford District 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, Uttlesford, 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 Uttlesford, these also include a small area of Green Belt to the south of the district.

Uttlesford District Council is currently in the process of reviewing its Local Plan. The District is experiencing major growth pressures and will see unprecedented growth in the next plan period and beyond: the Council is proactively planning for the delivery of three new Garden Communities and acknowledges continued growth at Stansted Airport. This scale of growth is set in the context of major growth in neighbouring districts, in north and mid-Essex, Hertfordshire and Cambridgeshire. Such growth is dependent upon investment in new infrastructure. The District, and its partners, including Essex County, is facing major challenges delivering existing planned growth. Any additional growth resulting from draft London Plan policy decisions would place irreconcilable pressures on local infrastructure and quality of life, which would run counter to the approach to 'Good Growth' set out in the draft London Plan.

It is thus crucial that the Mayor of London is able to demonstrate that the challenging growth targets in the London Plan are realistic and deliverable, and that all viable alternatives to

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<sup>3</sup> The 'London Functional Urban Area' includes all those districts and boroughs outside of London where at least ten percent of employed residents commute to areas of high employment density (e.g.: central London). See Brown, R. Eden, S and Bosetti, N, for Centre for London and Southern Policy Centre, January 2018, Next-door Neighbours – collaborative working across the London boundary

accommodating growth are fully explored. Uttlesford District Council therefore recommends that a strategic review of the London Green Belt is undertaken, in association with the Green Belt boroughs and districts (both within London and those that have good access and proximity outside London) to fully consider what opportunities exist for additional, sustainable growth locations in London before exploring opportunities further afield.

## **Aviation**

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. It should be noted that promoting additional airport capacity in the South East is part of a much wider debate on how UK aviation policy should develop in the medium and longer terms. In spite of the recent consultations on the draft Airports National Policy Statement and the new Aviation Strategy (phase 1), there seems to be an emerging policy vacuum on regional airport development, which the Council regards as a serious shortcoming. This is an issue that the Local Government Association, via its Strategic Aviation Special Interest Group, intends to pursue with ministers and civil servants.

Stansted Airport (owned and operated by MAG Airports) is an international gateway to the Capital and is recognised as a 'London' airport. In 2014 the airport was handling 20 million passengers per annum (MPPA) and 230,000 tonnes of freight. The airport currently benefits from planning permission that will see capacity expand to 35 MPPA by 2025, with freight handled also increasing to 243,500 tonnes per annum. Future growth ambitions exist and a planning application has been received that seeks the airport to expand such that it can handle 43.5 MPPA by 2030 as well as 400,000 tonnes of freight per annum.

Paragraph 10.8.7 of the draft London Plan makes reference to the potential for additional flights to and from Stansted Airport, making 'better use of its single runway'. The term "better use" needs to be treated with caution. Whilst the forthcoming planning application is unlikely to propose any increase in the number of permitted air transport movements at the airport, air noise (amongst other issues) is a key issue for local residents, especially from night flights and because of low background noise levels. As the local planning authority, the Council would need to carefully weigh the economic benefits of "better use" against the social and environmental dimensions that are also integral to sustainable development.

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 proposed schemes, such as Crossrail 2, should not be relied upon to cater for additional airport growth. The London Mayor calls for 'major investment by the airport authority and central Government in new

infrastructure'. 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 surface access infrastructure which is of benefit to London and the wider South East. Indeed, given that the policy approach of the draft London Plan is to push the negative impacts of air traffic away from London to other localities, it is essential that the GLA take a proactive role in helping to mitigate the adverse impacts of such an approach.

It is 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). Uttlesford District Council suggests that the word 'potentially' is removed from this clause, thus given a far stronger commitment to investment and delivery.

## **Infrastructure**

Figure 2.1 (The Key Diagram) of the draft London Plan identifies 'Crossrail 2', pointing to 'Connections Stansted Airport' as a growth corridor. This corridor 'links beyond London's boundaries into a 'Strategic Infrastructure Priority', identified on Figure 2.15 (Wider South East – 13 Strategic Infrastructure Priorities) and labelled as: West Coast Mainline, Crossrail; 2 North (London – Stansted – Cambridge – Peterborough) and M11.

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'.

Uttlesford District 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 Cambridge, as well as other strategic infrastructure items required to help deliver growth.

Based on growth at Stansted Airport alone, Network Rail's position is understood to be that further investment will be required to the railway line to the airport, potentially including doubling the existing branch and associated tunnel<sup>4</sup>. However, there is no funding currently in place for this.

Junctions on the M11, particularly at Stansted (Junction 8), but also at Harlow and further north towards Cambridgeshire, are operating at or close to capacity. These issues will be

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<sup>4</sup> See, for example, Network Rail, March 2016, Long Term Planning Process – Anglia Route Study

exacerbated through additional planned growth in both the M11 corridor and, east-west, along the A120 corridor. Any further growth over and above that currently being planned for through the review of Uttlesford's Local Plan will impede the ability of these to operate effectively. Funding has been identified for short term solutions to M11 Junction 8, but no further funding is available beyond this to resolve longer-term capacity issues. A sub-regional approach to transport infrastructure is required. This has added emphasis given the approach to airport capacity, any future growth at Stansted Airport and associated housing, economic and movement pressures this brings.

## Summary

Uttlesford District 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 review of the London Green Belt (Policy G2) in those areas most accessible to London should be undertaken to identify how and where London can meet the housing need it is generating.

Uttlesford District Council is supportive of the approach to aviation (Policy T8) and strategic infrastructure. The District Council welcomes ongoing collaboration with the London Mayor to help best secure infrastructure investment.

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