

INDIVIDUAL EXECUTIVE MEMBER DECISION
REFERENCE IMD: IMD 2018/15

TITLE	IMD 2018/16 Wokingham Borough Council response to the 'New London Plan' draft plan consultation
DECISION TO BE MADE BY	Executive Member for Strategic Highways and Planning- David Lee
DATE, MEETING ROOM and TIME	23 March 2018 FF14 - 9.00am
WARD	None Specific;
DIRECTOR	Director of Corporate Services - Graham Ebers, Interim Director of Environment - Josie Wragg

OUTCOME / BENEFITS TO THE COMMUNITY

To ensure that the New London Plan has minimal negative impacts upon Wokingham Borough and that any positive benefits are maximised.

RECOMMENDATION

The Executive Member for Strategic Planning and Highways agrees that Wokingham Borough Council:

- a) Support the intention of the Greater London Authority to meet its own housing need within the area of London itself with some unmet need met by 'willing partners' outside of London, while making it clear Wokingham Borough Council does not intend to be a 'willing partner'.
- b) Seek clarification regarding the Green Belt evidence underpinning the conclusion not to release any Green Belt land.
- c) Support the 13 identified transport priorities, and specifically encourage the rapid progression of the western and southern rail access to Heathrow airport

SUMMARY OF REPORT

The report sets out Wokingham Borough Council's (WBC) response to the New London Plan Draft Plan consultation. The South East England Councils, are also preparing a response on behalf of its member authorities which includes WBC. This report sets out WBC's specific response in relation to the issues of housing, employment land, transport, and waste. WBC is generally supportive of the Plan, but is clear that it does not expect to accommodate any of London's unmet development need within the borough.

Background

On 28 November 2017 Mayor Sadiq Khan published his draft new London Plan (Spatial Strategy for London) for consultation until 2 March 2018. It sets out his ambition for “Good Growth”: a sustainable, inclusive, step-change increase in London’s housing and economic growth for 2019-41, with housing targets for the first 10 years.

Following this consultation, the Plan is programmed for Examination in Public in autumn 2018. Once adopted in 2019 it will replace the current Plan adopted by Mayor Boris Johnson, and will need to be reflected in London boroughs’ local plans eg. housing targets, transport policies, economic policies.

The South East England Councils, of which Wokingham Borough Council is a part, has prepared a separate, co-ordinated response on behalf of its member authorities. The below is consistent with that response but draws out Wokingham specific issues where relevant.

Analysis of Issues

Generally, the Plan’s aspiration that London should accommodate its growth needs within its boundaries is welcomed (paras 2.3.1 and 4.1.1). This is considered important in order to minimise the need for commuting and make the city as sustainable as possible. There are concerns about whether this will be achievable in practice, particularly bearing in mind the significant increase in delivery rates that would be required. It would be helpful if the Plan could be more detailed in setting out how the proposed rates will be delivered.

Housing

The Plan sets out that there is need for 66,000 net additional homes per annum based on the Greater London Authority’s (GLA) Strategic Housing Market Assessment (SHMA). Against this need the plan recognises the capacity to deliver 65,000 homes per annum.

WBC notes that this represents a significant increase on current delivery rates in London and it is unclear how this is reflective of the Plans of each London borough. While a number of proposals are included in the plan to increase densities and promote further development of smaller sites, further clarity should be provided on how this would work in practice. It would also be helpful to include consideration of how an increased gap would be dealt with if, for example, the government’s proposed housing need methodology is imposed.

WBC considers that it would be helpful if the Plan made it clear that London has the responsibility for resolving any unmet need from the SHMA. This is important to enable authorities outside London to plan properly for their own growth without having to deal with any perceived London overspill.

The Plan refers to the intention to seek ‘willing partners’ to accommodate more growth beyond London (para 2.3.4). This would presumably aid plugging the identified gap of 1000 dwellings per annum. While the emphasis on only ‘willing’ partners is welcomed, it is not clear from the Plan how this will work in practice. It does not specify the locations of these partners, the tier of local government or what measures will be put in place to secure these partners. It would provide greater certainty and transparency if a call for

'willing partners' was carried out before the next version of the Plan is produced. WBC already has a significant housing need which it will need to plan for in its upcoming Local Plan Update. This need is significantly higher than surrounding authorities in the Western Berkshire Housing Market Area as well as many authorities beyond. For this reason WBC does not consider it is in a position to become a 'willing partner' to accommodate unmet need from London.

WBC also has a concern that the housing target is only for the first ten years – less than half of the plan period – with little indication of what will happen afterwards. Local Plans are normally expected to plan for at least 15 years of supply from the date of adoption. It would be helpful if further clarification could be provided on this, even if it is only in the form of strategic locations at this stage.

WBC notes that the plan only makes reference to 'Brexit' on one occasion, in an introductory paragraph. Though the impacts of Brexit are difficult to determine, it is highly likely that a number of companies will relocate to other cities on the continent and therefore vacate their office space in London and this could have significant spatial planning implications for the capital. WBC considers that the plan should acknowledge such trends and consider how such premises could be used to potentially provide housing development to help meet need over the plan period.

WBC supports the inclusion of a specific policy (H11) relating to minimising incidences of vacant properties, such as those which have been 'bought to leave'. WBC considers however that this policy, and supporting text, could more explicitly refer to investment properties, such as by international investors, which are acquired purely for their money generating potential and are left unoccupied.

Employment land,

WBC welcomes the recognition in Policy GG5 of the need to promote the strength and potential of the wider city region and likewise supports the proposals to plan for sufficient employment and industrial space to support economic development and regeneration.

WBC notes the intention of Policy E7/F that LPAs' development plans should look at the potential to relocate industrial capacity to neighbouring authorities. While the thrust of the policy is acceptable there is little evidence of the availability of receptor sites to take the displaced industrial capacity. Certainly in Berkshire, and probably across much of the Home Counties there is very little land available or suitable for such uses. As a result, while the principle of the policy is acceptable there is concern as to whether it will in fact be implementable.

Green Belt

WBC recognises the importance the government attaches to the protection of the Green Belt. However, in the context of a plan that does not propose to meet all its housing needs it is not considered a sound approach to seek the blanket protection of the Green Belt as proposed by Policy G2 in the absence of Green Belt review. This is of particular concern given that Policy G2 is supportive of extending the Green Belt 'where appropriate' which could further compromise the delivery of the planned growth by reducing the area of potentially developable land. The lack of a proper review of the Green Belt and the extent to which the land within it contributes to the purposes of the Green Belt means that this policy approach is not supported by any evidence. It is particularly inappropriate to

adopt this approach when many planning authorities around London are undertaking such reviews and in some cases removing land from the Green Belt in order to meet their development needs.

Transport

The plan is supportive of the 13 Strategic Infrastructure Priorities that have been endorsed by the Wider South East partners. The inclusion of the initial 13 Wider South East strategic transport infrastructure priorities is supported by WBC as is the recognition that these 13 transport priorities are needed to ensure existing growth plans can be delivered and address current shortfalls in transport provision.

The Plan should continue to be clear that Wider South East transport priorities are not being planned as corridors for extra growth from London. Wokingham Borough’s growth plans are to be decided through the forthcoming Local Plan Update and the London Plan should not seek to influence them unduly.

The Plan opposes the expansion of Heathrow if additional noise or air quality harm would result, and sets out that support for additional aviation capacity, including improved surface access (Policy T8). The Plan should emphasise the need for western and southern rail access to Heathrow *now*; they are already necessary to tackle existing transport and air quality problems, and should be implemented for the current two-runway configuration rather than as a by-product of expansion, should it happen.

Waste

WBC strongly supports the intention that by 2026 London will cease to export household and commercial and industrial waste (Table 9.3).

There is also support for Policy S19 to safeguard existing waste sites. This will be important if waste capacity is to be maintained in the context of intense demand for development land.

As a general comment, the Plan is not always clear how intentions expressed in the supporting text to policies are followed through in policy. While intentions may be set in supporting text unless these are clearly followed through in policy it is unlikely that they will be realized.

FINANCIAL IMPLICATIONS OF THE RECOMMENDATION

The Council faces severe financial challenges over the coming years as a result of the austerity measures implemented by the Government and subsequent reductions to public sector funding. It is estimated that Wokingham Borough Council will be required to make budget reductions in excess of £20m over the next three years and all Executive decisions should be made in this context.

	How much will it Cost/ (Save)	Is there sufficient funding – if not quantify the Shortfall	Revenue or Capital?
Current Financial Year (Year 1)	n/a	n/a	n/a

Next Financial Year (Year 2)	n/a	n/a	n/a
Following Financial Year (Year 3)	n/a	n/a	n/a

Other financial information relevant to the Recommendation/Decision
None anticipated

Cross-Council Implications (how does this decision impact on other Council services, including property and priorities?)
Decisions in London and in 'willing partner' authority areas beyond on future growth could affect how the authority needs to resolve impacts on services such as transport, education, etc. within the borough.

SUMMARY OF CONSULTATION RESPONSES	
Director – Corporate Services	
Monitoring Officer	
Leader of the Council	

Reasons for considering the report in Part 2
n/a

List of Background Papers
Information published by Greater London Authority relating to the Draft London Plan– see https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan
