

East of England Response to the Draft New London Plan Consultation

27 February 2018

1. INTRODUCTION

- 1.1 The London Plan plays a significant role in ensuring that London is able to address its future challenges, including the increasing pressure on Land, Infrastructure and the Environment. The current draft London Plan is ambitious and if delivered could achieve positive outcomes for both London and the Wider South East (WSE), and is thus broadly welcomed by councils in the East of England. In particular, the Mayor of London's vision to secure "good growth", which is defined as economically and socially inclusive growth and more genuinely affordable homes are principles worthy of support.
- 1.2 As a package of strategies, approaches and policies, the Plan is proactive and comprehensive, however there remain challenges and uncertainties arising for councils in the East of England from the current draft Plan, which are set out below.

2. KEY ISSUES / MESSAGES

- Councils in the East of England are generally supportive of the package of strategies, approaches and policies and particularly the six core Good Growth policies. And welcome the commitment to meet the vast majority of London's housing needs within London.
- Clarification is required in the Plan with respect to:
 - a) The scale of housing need in the period to 2029 (it appears to be substantively greater than that averaged out over the period to 2041). A technical note on London's housing requirement evidence base, which forms part of the East of England response, is attached as **Appendix 1**.
 - b) The Mayor of London's intentions with regard to 1,000 homes per annum that it would appear there are no proactive proposals to plan for (the difference between housing need and housing supply).
 - c) How any housing delivery failure will be managed within London as part of a Full Review of the Plan (along with a commitment as to how such a review would be triggered).
 - d) There remains ambiguity with respect to the "willing partners" approach, and clarification is sought on London's intentions with regard to looking to longer term approaches and timeframes for growth management within the Wider South East.
 - e) The need to further consider the impact of intensification of industrial land as part of the process of limited employment land release and greater clarification of the advantages of relocation of businesses in collaboration with Wider South East authorities.

3. WIDER SOUTH EAST AND WILLING PARTNERS

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

- 3.1 In this particular plan, there is recognition that London is not an island and that its economy is inextricably linked with the WSE. Reference is made to the WSE collaboration arrangements which complement the duty to cooperate, at chapter 2 of the draft London Plan. The WSE collaboration

arrangements thus present a vital opportunity with respect to engaging willing partners, a point that was reflected in the Mayor of London's address to the WSE Summit on 26 January when he reiterated his commitment to strengthening continued joint working.

3.2 Elected members and officers from the East of England 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.

- **Policy SD3: Growth Locations in the Wider South East and beyond (and supporting text)**

3.3 In this draft plan, the Mayor also 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 to meet need and secure mutual benefits for London and relevant partners (Policy SD3 on Growth locations in the Wider South East and beyond). It is in this context 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.'*(2.3.4) This 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 – a prospect that many councils in the East will object to. As such 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.

3.4 At the WSE Summit on 26 January 2018, the Mayor reiterated his commitment to work with willing partners, stressing that the GLA aims to explore with councils how to work better together and address the concern that London simply wants to export its problems and challenges. Indeed councils in the East of England welcomed the recognition by the Mayor in his draft Economic Strategy that the WSE has overlapping economies and his desire to build stronger economic partnerships.

3.5 In illustrating London in its wider regional setting the Plan identifies the thirteen WSE Strategic Infrastructure Priorities that have been endorsed by the WSE partners through the WSE Political Steering Group and Summits (Figure 2.15 – Wider South East – 13 Initial Strategic Infrastructure Priorities). Councils in the East support the Plan's recognition that collaboration with willing partners could help alleviate some of the pressure on London while achieving local ambitions in the WSE for growth and development, recognising that this may require further infrastructure.

3.6 The purpose and intentions of Policy SD3 and its supporting text are not at all clear. The text of the policy appears to relate to investment in strategic infrastructure (presumably transport) to support growth where there are relationships to London (though the title of the policy suggests it is about growth locations beyond London). But when one turns to the supporting text, the focus seems to turn away from infrastructure and towards the delivery challenges associated with housing growth:

*'...that as far as possible sufficient provision will be made to **accommodate the projected growth within London**.....'*

*The GLA's new **Strategic Housing Market Assessment** shows that London has a need for approximately 66,000 additional homes a year. The Strategic Housing Land Availability Assessment suggests that London has the capacity for around 65,000 additional homes a year and the housing targets in this Plan reflect this.....'*

Despite this Plan seeking to accommodate the vast majority of London's future growth, some migration will continue.....'

*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 seems to start to explore the possibility of locations beyond London being suitable to accommodate not only growth generated there, but also some of London’s growth. This message is then reinforced in paragraphs that follow:*

‘.....The focus is on locations that are (or are planned to be) well-connected by public transport and where development can help meet local growth aspirations as well as wider requirements. Recognising that investment in public transport can often bring significant benefits to wider areas, such partnerships could focus on optimising rail capacity between London, the wider region and beyond. Another area of focus could be proposals for new/garden settlements with good links to London.....’

.....Collaboration with willing partners can help alleviate some of the pressure on London while achieving local ambitions in the WSE for growth and development, recognising that this may require further infrastructure.....’

*.....The Mayor will work with key **willing partners**, including local authorities, Local Enterprise Partnerships, the National Infrastructure Commission and Government, to explore strategic growth opportunities where planning and delivery of strategic infrastructure (in particular public transport) improvements can unlock development that supports the wider city region.....’*

.....The Mayor continues to encourage authorities outside London to become willing partners and work with the capital on opportunities for growth, where mutual interest can be achieved.’

- 3.7 The ‘willing partners’ approach appears to relate to ‘longer-term contingencies’, though ‘longer term’ is not defined. It may well be that this whole section of the Plan is designed to pave the way for a strategic dialogue between London and the WSE and beyond about how the next tranche of strategic growth (demographic and economic) is to be managed, including exportation of London growth, **for the period post-2029**. Reference is made, for example, to the National Infrastructure Commission being one of the ‘willing partners’ and this could reflect a view by the Mayor that initiatives such as the Oxford-Cambridge Corridor and the scale of growth potential within it represent a strategic opportunity to help address growth pressure not only within the corridor itself, but from other areas, including London. If this is the case then it resembles the very dialogue the Inspector into the Further Alterations was expecting to have happened to inform this Plan.
- 3.8 The supporting text contains a diagram of the strategic infrastructure priorities in the wider south east and beyond where the Mayor states *‘Some of these orbital priorities may have more capacity to accommodate additional growth than the radial ones’* (2.3.6). The Mayor appears to view these transport infrastructure priorities as potentially suitable for his ‘willing partners’ approach. In developing these infrastructure priorities the authorities beyond London have been clear that their purpose is to identify infrastructure priorities, which while supporting growth, should not be construed as growth corridors. Associating these infrastructure priorities within the Mayor’s approach to ‘willing partners’ on managing longer term growth potentially takes their scope beyond that agreed within the WSE political arrangements.
- 3.9 The authorities in the East of England call for:
- a discussion within the Wider South East political arrangements seeking clarification about what the Mayor of London’s intentions are in relation to this section of the Plan – is it designed to commence a dialogue in relation to post 2029 scenarios?
 - a redraft of the policy and supporting text to reflect that clarified position.

- the need to remove any suggestion that the strategic transport infrastructure priorities are growth priorities/corridors and perhaps the transfer of text relating to infrastructure priorities to the transport section of the Plan along with additional text about their purpose and how they are to be taken forward.

4. LONDON'S HOUSING NEED AND ITS ABILITY TO MEET THIS REQUIREMENT

- **Policy GG4: Delivering the Homes Londoners Need**
- **Policy H1: Increasing housing supply (and supporting text)**
- **Policy H2: Small sites (and supporting text)**
- **Policy H3: Monitoring housing Targets (and supporting text)**

4.1 The Draft London Plan states that London “*aims to accommodate all of London’s growth within its boundaries without intruding on its Green Belt or other protected open spaces. As with any successful urban area this does not mean that in- and out-migration will cease, but that as far as possible sufficient provision will be made to accommodate the projected growth within London.*” (2.3.1). Councils in the East of England broadly support this commitment.

4.2 However, there are a numbers of matters that need to be clarified and resolved as the Plan progresses, some of which are likely to require modifications to the Plan.

4.3 Councils in the East have concerns that:

4.3.1 Whilst the new Draft London Plan goes up to 2041 and contains an ambitious 10 year housing supply, it is less clear across the policies what will happen with housing in the longer term.

4.3.2 **Missing 1,000 dpa (dwellings per annum)** - the Plan identifies a need for 66,000 dpa and considers it has capacity to (and contains specific policies and targets to) deliver 65,000 dpa. The previous London Plan, which similarly failed to proactively plan specifically for the level of identified need (but in that case the gap was 7,000pa), contained policy wording (*‘Boroughs should draw on the housing benchmarks in table 3.1 in developing their LDF housing targets, augmented where possible with extra housing capacity to close the gap between identified housing need.....’*) that sought to encourage London Boroughs to exceed their specific housing targets to make inroads into managing the 7,000pa shortfall between ‘need for’ and ‘plan for’. The current draft Plan contains no such wording. What is the approach of the London Plan to the ‘missing 1,000 dpa’?

4.3.3 **Level of housing need** – for the purposes of identifying a level of housing need to plan for within the Plan, assessed housing need has been identified for the period 2016-2041, averaged out to identify an average annualised figure and then that annual average applied to the ten year period 2019-2029. That 25 year average annual figure is 66,000pa. But if one looks at the need for the period 2016-2029 – the housing timeframe of the Plan - it appears that need rises by at least 10,000pa. Clarification on this matter has been sought from GLA but at the time of writing has not been received. If correct, this potential shortfall of provision planned for against need has potentially significant implications both for London and areas beyond. The Plan preparation process needs to clarify if this position is indeed the case and if it is, justify why it is not appropriate to meet the assessed level of need, as well as identify the likely consequences of not meeting it (see **Appendix 1**).

4.3.4 **Housing delivery failure?** - The Further Alterations published in 2015 identified a housing need of 49,000 dpa and a housing target of 42,000 dpa. In practice, London struggles to deliver half of its need and a recent high in delivery in 2014/15 of 32,440 was still 17,000 dpa short of the annual level of need and 10,000 dpa short of the extant London Plan target. In the period 2001/2 to 2014/15 average annual housing delivery within London was 27,444 dpa. Housing delivery failure against London Plan targets is a consistent and ongoing theme. 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 ahead it would seem prudent to plan for the possibility of failure and the Plan is not as clear as it might be in terms of what would happen were failure to materialise. The Mayor of London himself recognises that the London housing crisis ‘.....is unacceptable and I am determined to make a difference. I have been honest with Londoners from the start – we are not going to be able to turn things around overnight. This is going to be a marathon, not a sprint. But we are working hard every day and we have already started to take big steps forward’ (Foreword, London Housing Strategy September 2017). Even the Mayor does not appear to expect a significant change in the short and even perhaps medium term.

4.3.5 Informally the GLA has confirmed that were housing delivery within London to continue to fail, this would be dealt with by a review of the London Plan, not by placing expectations upon local authorities beyond London. Despite this, however, it is possible to envisage a scenario in which local planning authorities bringing forward local plans beyond London are pressurised by some parties, and perhaps asked by Inspectors, to explain how they propose to address housing delivery shortfall within London – are they to uplift their housing targets? Given this potential eventuality, confirmation is required within the Plan (probably within both policy and supporting text) that housing delivery failure is a matter for London and would be dealt with by means of a review of the Plan. It may also be appropriate for the Plan to include a trigger point for such a Review – a specific number of years of failure, for example – supported by appropriate monitoring frameworks and policy wording to set out contingencies/actions in the event that delivery falls short of housing and infrastructure policy requirements. This would demonstrate how London is progressing on its ambitions and avoid the risk of unintended and unplanned consequences beyond London.

- **Policy H16: Gypsy and Traveler accommodation (and supporting text)**

4.4 At paragraph 4.16.2 of the Draft London Plan, the Mayor has adopted a new definition of Gypsies and Travellers which is different to the Government. It is unclear whether the London Boroughs have agreed to this new definition as paragraph 4.16.6 is in fact a requirement of all of them. Additionally, 4.16.7 of the Plan states that London Boroughs should actively plan for Gypsies and Travellers’ accommodation needs. The Plan does not clarify the position if this need cannot be met and what steps should be taken to address unmet need.

5. **TRANSPORT**

5.1 The economy of the East of England is inextricably linked to London’s economy and the region plays an important role in complementing and enhancing the position of London as a world city. However the historical neglect in transport investment in the region risks jeopardising the future growth not just of the region but also of London and the broader WSE.

5.2 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. One such opportunity would be for the Mayor to demonstrate this commitment by supporting the Metropolitan Line Extension which has recently stalled following TfL’s withdrawal from the completion of the scheme.

5.3 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, for example in Essex and Hertfordshire, need to be given greater priority.

5.4 There is a need for cross-border relationships between TfL and transport bodies and councils in the East of England 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 and wider partners to make the case for expanding road and rail capacity both within and outside of London.

5.5 [The East of England LGA response to the Mayor of London's Transport Strategy](#) on 2 October 2017 should be considered in conjunction with this response.

6. EMPLOYMENT

6.1 The forecasts of employment growth come from GLA's own forecasts. Councils in the East are reviewing how these projections compare to our own, principally through the East of England Forecasting Model.

- **Policy SD4: The Central Activities Zone (supporting text para 2.4.3)**
- **Policy SD5: Offices, other strategic functions and residential development in the CAZ**
- **Policy E1: Offices (and supporting text)**

6.2 The policy emphasis on offices is understandable given London's forecast growth in office-based employment of 619,300 over the 25 years of the plan. At 24,772 per annum, this is 64% more than the 15,150 per annum in the current adopted plan. The LSE's review of research noted the relationship between London's employment growth and commuting and highlighted that managerial-technical occupations account for over 75% of net commuting into London and the entire growth in net inward commuting between 2004 and 2016 ([LSE, Review of Research on Migration Influences and Implications for Population Dynamics in the Wider South East](#), page 78). Given that London's own research highlights that most (288,800) of the increase in office employment will occur in the Central Activity Zone, and that commuting from the WSE is so significant, there is a clear need to deliver a wide range of transport measures to meet this increase in demand.

6.3 The Draft London Plan places the potential for Stratford to act as a satellite for major office space but only after demand has exceeded the capacity of the Central Activity Zone and the Northern Isle of Dogs. The London Plan should be setting a positive framework to facilitate development and this hierarchy should not restrict the potential for "good growth" to occur in these satellite locations even if there is capacity within the other areas.

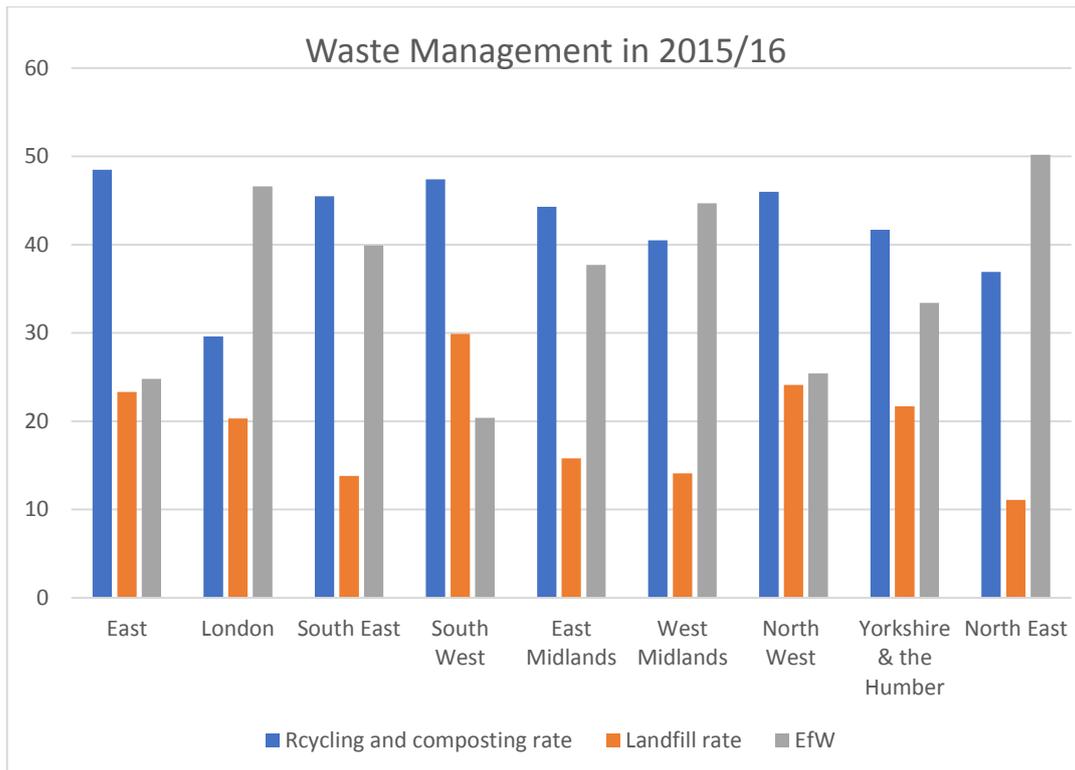
- **Policy E4: Land for Industry, logistic and services to support London's economic future (and supporting text)**
- **Policy E5: Strategic Industrial Land (SIL)**
- **Policy E7: Intensification, co-location and substitution of land for Industry, logistics and services to support London's economic function (and supporting text)**

6.4 Authorities are also concerned that the processes from redevelopment of industrial land would be ad hoc and welcome the commitment in the London Plan for a strategically co-ordinated process that focuses on intensification as well as the potential for substitution outside London where there is local agreement (policy E7).

6.5 The three boroughs identified for limited release of industrial land and floor space are boroughs within the Thames Gateway that link to authorities within the East. The limited release is based on these areas having relatively low values and high vacancy rates. Notwithstanding the general supportive position of the economy policies in the draft London Plan, such as the aim for no net loss of industrial land uses, the application of the intensification approach needs to be applied within these areas. London's industrial study highlighted that two of the three areas assigned for limited release (Havering and Barking & Dagenham) actually saw net increases in floor space between 2001-2016. The report also notes that "there are some signs that occupiers and developers who would previously only consider west London locations are now looking to the east" ([CAG, London Industrial Land Demand, page 213](#)). These factors indicate that pursuing of intensification in these areas is a justified approach and the interaction between the proposed policies could be clearer in this regard.

- 6.6 The protection afforded to secondary materials and waste management in the policies (E4 and E5) is welcome and benefits the vitality of the wider waste supply chain but, so to link with the safeguarding policy on aggregates (SI10), reference could also be made to aggregates within the economic policies.
- **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)**
- 6.7 Policies within the draft London Plan (E5, E7 and E8) refer to the potential of relocating some employment to the WSE and collaborative working with authorities outside London on this matter. At the Wider South East Summit, the Mayor referred the Royal Opera House’s linkage to Thurrock and the Deputy Mayor agreed to joint research on the location of firms. Councils in the East welcome the recognition of the wider economic aspects and that London’s policy and evidence base reflects on the office and industrial markets in the Wider South East.
- 6.8 Representatives of the GLA have also previously expressed an interest in moving jobs into the WSE. There would be a mutual benefit to London and East of England residents if our economic prospects were aligned so that more jobs were created and, if necessary, moved from London particularly if people were enabled to live and work locally – thereby easing pressure off London’s already strained transport network and housing. It would be helpful if as part of the London Plan, the Mayor of London set out *activities* related to aligning economic development opportunities across the WSE alongside local authorities and Local Enterprise partnerships. This would enable willing partners to better identify opportunities for collaborating with London and help develop a more sustainable approach to managing growth in London and the WSE as a whole.
- 6.9 There is scope for further collaboration surrounding the economic linkages. The LSE’s migration review noted that, the economic interconnections have “matured to a stage where almost all of it is integrated in one economic agglomeration” ([LSE, Review of Research on Migration Influences and Implications for Population Dynamics in the Wider South East](#), page 23). The economic development activities such as the [Tech Nation 2017 Survey](#), [TechCity](#) and [MedCity](#) are not just relevant to London but can be linked to supply-chains and sectoral linkages throughout the WSE. The emphasis on linkages through academic research institutes in Oxford and Cambridge through MedCity is a clear example and authorities in the East are interested in exploring other economic linkages further. The draft London Plan contains supportive policies to restrict the permitted development rights on conversion of office to residential.
- 6.10 Many towns outside of London have also lost office space under existing permitted development rights and face difficulty attracting replacement businesses. Businesses do not necessarily consider opportunities beyond London’s boundary and may need a nudge to encourage them to invest in areas outside of London. High quality employers are key to sustainable local growth and there would be a mutual benefit to London and councils areas in the East if more jobs were created outside of London so that more residents were able to live and work locally – thereby easing pressure off London and the region’s already strained transport network and housing.
- 6.10 It is noted in Policy E8 that the Mayor of London 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. The East of England considers 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.
7. **LONDON’S WASTE MANAGEMENT**
- **Policy SI7: Reducing waste and supporting the circular economy**
 - **Policy SI8: Waste capacity and net waste self-sufficiency (and supporting text)**

- 7.1 The key task for Waste Planning Authorities (WPAs) in the East of England is the provision of sufficient waste management capacity for the equivalent quantity of waste arising in their area, together with an additional quantity of waste that is received from London. While the London Plan aspires to self-sufficiency, the reality of providing waste management facilities in London is very challenging, particularly in the current context in which housing takes priority over industrial development, especially potentially “bad neighbour” uses such as waste management facilities.
- 7.2 Historically London has been dependent on landfill void in both the East of England and the South East of England for disposal of its residual waste, and this is still the case to a significant degree. However, landfill sites in the East of England have now largely closed and the cost of landfilling biodegradable waste is extremely high, largely due to the landfill tax which currently stands at £86.40 per tonne.
- 7.3 The authorities in the East of England have some of the highest recycling rates in the UK as shown in the graph below:



It can also be seen that the East of England has the second lowest level of residual waste treatment by energy from waste, with the South West having the lowest.

- 7.4 The East of England Waste Technical Advisory Group have prepared a response in relation to waste matters in the London Plan. This has been drafted in collaboration with the Waste Authorities in the East of England and should also be considered as forming part of the East of England LGA response to the London Plan on waste matters. A copy of this response is attached at **Appendix 2**.
