



Local London Partnership

Response to the Consultation on the London Plan 2018

About Local London

1. Local London is a partnership comprising the London Boroughs of Barking & Dagenham, Bexley, Enfield, Greenwich, Havering, Newham, Redbridge and Waltham Forest. Local London is led and managed by a Joint Committee set up in 2016.
2. The boroughs have come together to promote sustainable and inclusive growth in the Local London area and to enhance the prosperity, health and well-being of all in our communities. To achieve this we develop and deliver collaborative strategies and programmes to secure the potential benefits of growth and tackle the challenges it can bring. Working with stakeholder organisations in our area and London partners we seek investment and policy support for our aims and objectives and the devolution of powers from central government.
3. Local London has 2.1m residents¹ and has experienced significant recent population growth. Between 2005 and 2017 the population grew by nearly one quarter, almost twice as fast as in the rest of London and substantially above that for any of the combined authorities (CAs) such as the West Midlands (7 %) or Greater Manchester (6 %)². It has a total GVA of £32.8bn, comprising 11% of London's total GVA³.

Business Plan for Growth

4. All the forecasts and projections for the Local London area indicate considerable population, economic and housing growth over the foreseeable future. Local London's key objective is to ensure that this growth is sustainable and inclusive. So we wish to work with London and National government and other stakeholders including businesses, skills and education providers and residents, to achieve:
 - Economic growth that creates opportunity for all segments of our population and distributes the dividends of increased prosperity, both in monetary and non-monetary terms, fairly across communities.
 - A rate of growth which can be sustained without creating other significant economic, social and environmental problems for our communities and, especially, for future generations.
5. To achieve these objectives we will produce, with our partners and stakeholders, including the GLA, a 'Business Plan for Growth'. The overall objective of this Plan will be to set out the impact and extent of the potential economic, housing and population growth in the Local London area and the policies and investment that are required to deliver it inclusively and sustainably.

¹ ONS Mid-year estimate 2012

² Oxford Economics estimates 2018

³ ONS Regional GVA 2016



6. The Local London's approach is based on the following:

- that the growth that Local London is being asked to deliver is unique in scale and importance compared with other sub-regions in London and with other cities in the UK; achieving this level of growth will be a major contributor to the UK's future growth and prosperity
- to attain this level of growth will require underpinning and enabling policies and investment by central and London government and the devolution of decisions and powers to the sub-region; particularly with regard to investment in and the provision of housing, hard infrastructure (transport, power, communications, water supply and drainage) and soft infrastructure (skills and education, health and community provision including for sport and leisure, including green space)
- that if this growth is to be sustainable and inclusive it must contribute positively to the prosperity and quality of life of the existing Local London resident population

We have now embarked on the development of our Business Plan for Growth and as a first stage have commissioned Oxford Economics to produce a baseline assessment of the current socio-economic position of the Local London area with key trend data.

The London Plan approach - what we value and why

7. Overall the Plan has much to commend it. In particular, we support the positive concept of 'Good Growth' - planning for growth on the basis of its potential to improve the health and quality of life of all Londoners, to reduce inequalities and to make the city a better place to live, work and visit. This broadly accords with our own vision of inclusive and sustainable growth which we will develop through our Business Plan for Growth and we look forward to working in partnership with the Mayor to achieve 'Good Growth'.
8. We support Policies GG1 to GG6 which set out the broad policy approach to achieving 'Good Growth' with the proviso that there is potential for conflict between these and some Policies relating to housing growth, transport and employment which we address later in this response.

Where we have Policy concerns and why

Spatial Development Patterns

9. **Wider South East:** At 2.0.5 the Plan notes that "London's influence and economy continue beyond the M25. Many of London's growth corridors have links beyond London's boundaries." Policy SD2 sets out Policy on collaboration in the Wider South East. The Policies are more by way of statements of intent which may generally contribute to the achievement of the Plan's policies for Good Growth,



Housing and Employment rather than Policies which will make a material difference to meeting the needs of the housing and employment projections. Collaboration is important to realise the potential of growth corridors, such as the London, Stansted Cambridge and the Thames Estuary. However, given the challenge of meeting London's housing needs within the GLA boundary (without impacting on Green Belt and MOL protection) and the track record of actual delivery to date it is unclear why the Mayor has not taken the opportunity of cooperation to more vigorously explore the potential to accommodate some of London's housing need outside the GLA area.

10. In taking forward Policy SD2, boroughs, and particularly outer London boroughs should be engaged in any discussion the Mayor is having with the Wider South East authorities.
11. **Green Belt:** The draft London Plan supports the continued protection of the Green Belt from inappropriate development. Policy G2 aims to accommodate all of London's growth within the capital's boundaries and without 'intruding on its Green Belt'.
12. Whilst some Local London-boroughs view the draft London Plan Policy as the right approach to the Green Belt other Local London boroughs are concerned that Policy G2 does not refer to NPPF policy regarding development in the Green Belt.
13. The latter are concerned that it includes simplified wording that seems to offer less scope than at present to consider individual proposals, or 'very special circumstances'. Until the NPPF is amended, the London Plan's 'absolutely no de-designation' stance is contrary to national policy.
14. This could unnecessarily restrict some Local London Boroughs, as part of their Local Plan function, in carrying out a robust assessment of Green Belt in accordance with the NPPF and potentially demonstrating 'exceptional circumstances' to go into the Green Belt to meet significant housing and infrastructure needs. (A recent example has been the LB Redbridge Local Plan where this approach was fully endorsed by the Local Plan Inspector).

Deliverability

15. This concern touches on the issue of whether the Plan is sound and, in particular, if the Policies are justified and likely to be effective. We are concerned that the Plan may not be capable of meeting the objectives spelt out in the Policies for Good Growth. We are mindful of the statement made by the Deputy Mayor for Planning, Regeneration and Skills at the London Assembly Planning Committee in answer to a question about what the Plan will deliver. *"I think it will if this*

blueprint is followed, because that is what it is. It is a blueprint for how it can be done, and I come back to my earlier point about the funding. If we cannot either get fiscal devolution or if the Government, alternatively, does not step back into the space of subsidising social infrastructure to levels that it was previously or approaching those levels, if all we are left with is trying to tax developments to deliver all of this, then, no, I do not think we will deliver it. However, as I say, it is a blueprint to show how it can be done and how we think growth can be handled well, including a chapter of what we think needs to be funded to be able to deliver this.” These funding needs are spelt out in Chapter 11. The chapter deals particularly with the increased investment in infrastructure and fundamental changes to the housing market needed to achieve the step change in housing delivery envisaged in the Plan. The significant need to invest in enabling infrastructure, water, energy, waste, digital connectivity and social infrastructure is also referenced. The public sector funding gap is particularly emphasised (para 11.1.8). Funding the infrastructure to support growth is a necessary prerequisite to achieve Good Growth in the Local London area.

16. Our concern is that these investments are dependent on public policy decisions by Government which are outside and independent of the Plan making process but are stated to be key to the delivery the London Plan policies. This makes the whole Plan uncertain. In Local London there is particular concern that the investment in public transport infrastructure required to enable Good Growth will not be forthcoming, or at least not at the same pace as housing provision, leading to adverse impacts on the Plan’s Policies for Good Growth. A lack of new public transport provision will lead to greater use of motor vehicles for trips and increased road congestion, particularly in outer London, with adverse impacts people’s ability to move around the City (Policy GG1/A), on health through increased pollution (Policy GG3/A) and on transport provision (Policy GG5/G) and Policy T3.

Transport Infrastructure

17. The main enabling transport infrastructure required to underpin the London Plan’s projected growth in Local London was set out in the Local London response to the Mayor’s Transport Strategy which can be found [here](#). Drawing from that document and other work by boroughs we would particularly emphasise the importance of the following schemes as prerequisites for the sustainable achievement of the housing growth projections in the London Plan.

DLR – the extension of the DLR from Gallions Reach to Barking and Thamesmead



Capacity Enhancements – Stratford International and West Ham Stations
Barking - Gospel Oak Line - the extension of the Barking – Gospel Oak line from Barking Riverside to Abbey Wood to link with Elizabeth Line services
Elizabeth Line - extension of Elizabeth Line to Ebbsfleet.
Crossrail 2: including the early four-tracking of the West Anglia Main Line between Tottenham Hale and Broxbourne.
Crossrail 2 – New Southgate Spur
Crossrail 2 – Eastern Spur
River Crossings – there is a need to accelerate consideration of the river crossings (p.12 of the LLP Response to the Mayor’s Transport Strategy Consultation refers)

Stations: Ruckholt Road Station (in Waltham Forest) & Beckton Riverside and Thames Wharf

Bus Transit/Tram Services - a north-south bus transit connecting Marks Gate to Barking Riverside; an east –west transit connecting the key town centres and growth areas in London Riverside; an east – west transit/s for the Upper Lee Valley; North Greenwich to Slade Green; an east London Bus Rapid Transit service serving London Riverside and further north towards Romford; and, a Tram Link serving Romford and Rainham and Beam Park with potential links to Collier Row. Bus and tram services are particularly important to enabling the development of town centres in Outer London where sub-regional orbital movements are not well supported by public transport links.

Housing Supply

18. We welcome the Plan’s aspiration to achieve a level of housing supply that broadly meets London’s needs, although we have grave doubts over the realism and achievability of this based on past performance and, in some cases, needs analysis. We note that the major change over the current Plan is the new Policy focus on delivery on small sites (accounting for 37% of the projected annual delivery) and on increased housing density of existing residential homes within PTALs 3-6 or within 800m of a tube station, rail station or town centre boundary. This is accompanied by a presumption in favour of housing developments that provide between one and 25 homes. The Boroughs require greater flexibility to increase the delivery of homes and have serious reservations about the deliverability of small sites, concerns about the quality of development, access and integration into the existing urban fabric. Presently the Mayors housing strategy indicates that currently 80% of the new homes built in London are only affordable to 8% of Londoners. Savills research indicates London needs to build

95,000 new homes a year to reduce affordability gap. The Boroughs are keen to ensure their residents can access housing despite low wages.

19. Local London is concerned at both a policy and practical level with the Policies relating to small site development. With regard to Policy H2 we believe the criteria for a presumption in favour are too broad and have the potential to adversely impact on the character and environmental quality of very suburban, low density, locations (for instance Gidea Park, Upminster, Southgate and Oakwood) which happen to be within 800m of a tube or rail station and where higher density development would be inappropriate. We consider careful local determination of capacity coupled with flexibility are key to developing small sites.
20. We are also concerned about the resource implications of properly managing Policy H2 through the use of 'area wide design codes' and the timing of the implementation of the Policy. Local Authorities are already under considerable financial pressure and securing and resourcing professional staff to produce design codes will be challenging. The codes will also take some time to draft and consult. If the intention of the Policy is to achieve 'Good Growth' in accordance with Policies GG1 to GG6 the preparation of design codes is a prerequisite for the implementation of Policy H2. Therefore a phasing of the implementation of Policy H2 should be set out to allow reasonable time for Boroughs to prepare and adopt areas design codes in advance of development and the application of the presumption in favour. We also believe that the Mayor should proceed with some caution with regard to this Policy as design codes are not going to provide a one-size fits all solution for small sites which are often widely distributed and with unique site specific parameters to consider which could lead to an increase in the incidence of Planning by appeal.
21. We would also ask that the Mayor works with the Boroughs to lobby Government for the resources, through fees or other means, to assist in funding this work. Indeed the need to fund the planning system adequately to deliver the Plan objectives should be strongly referenced by the Mayor in Chapter 11 of the Plan.
22. With regard to the Policy for development of small sites set out in H2 we are also concerned that it will be in the nature of the incremental increase in the residential population of town centres and other locations arising from small site development that the provision of new social, health, educational, local transport and leisure and recreation facilities, if funded through planning agreements, will lag considerably behind the pace of development. Boroughs will need to aggregate contributions from a series of developments over time in order to secure the significant pot of funds necessary to provide new facilities. This will work against the full realisation of the Good Growth Policies.

23. There is a great emphasis given to the development of small sites (as opposed to the housing supply coming from larger developments) many of which may be of 10 units or less and there must be concern that the inability of boroughs to seek S106 contributions for affordable housing or to pooled funding 'pots' intended to fund the provision of general infrastructure in the wider area will impact on their ability to mitigate for the environmental impacts of the proposed scale of housing and population growth. This will adversely impact on the general health and well-being of the community and will inhibit and work against the achievement of the Plan's policies on 'Good Growth'. If the Mayor is seeking to achieve 'Good Growth' through this Plan with a very high proportion of development on small sites he, with the support of the Boroughs, should seek Government agreement to a change to the current policy set out in the Ministerial Statement of 24th November 2014 in order to recognise the special circumstances in London created by the London Plan.

The Plan provides for a very significant increase in the housing projections for boroughs with outer London characteristics with the majority of the housing being provided from small sites - between 47% and 69% for Bexley, Enfield, Havering, Redbridge and Waltham Forest. Newham's target is a substantial uplift on current London Plan target (excluding LLDC) going from 19,945 to 38,500. This is an increase of 18,555 additional units (or 1,856 annually) a 93% rise. As an example, Newham's average small sites delivery is 231 (actual 6 year average) as compared to 950 a year in the new target (over 4 times as much).

24. The increases in the housing projections for Bexley, Enfield and Waltham Forest over the previous London Plan are particularly marked. Notwithstanding the application of good design codes the impact of the character and density of these boroughs, and particularly their major, district, local and neighbourhood centres, will be significant. Of particular concern is the impact on road congestion and air quality in the outer London areas. The use of PTALs is a crude measure of accessibility to services and employment in outer London. The key, and unaddressed, issue in the London Plan is the absence of good quality, high frequency sub-regional orbital and radial public transport links to and from centres in outer London. By and large the transport accessibility the PTAL measure will be reflecting is East/West transport accessibility whereas a significant number of trips in Outer London are to other locations. The risk is therefore that this pattern of development will not be environmentally sustainable with car usage increasing significantly with resultant adverse effects on air pollution and increased congestion resulting in economic costs. This becomes a particular issue when considering our comments earlier on the lack of secured investment in transport infrastructure. Our view is that the impact of this Policy is therefore in conflict with the Policies relating to "Good Growth".

25. We disagree with the proposition that developments in town centres should cater to predominantly smaller households, Build to Rent, older people's housing and student accommodation. This discriminates against families, can result in less inclusive and mixed communities and undermines local plan-making. The evidence from SHAMAs undertaken by boroughs in Local London is that there is considerably more demand for family size units of more than two bedrooms than is indicated in the SHAMA underpinning the London Plan assumptions.
26. We object to and disagree with the assertion in para 4.123 that because families live in two bedroom units that should be taken into account in assessing the unit size (in terms of bedrooms) of developments and how it meets needs (both in market and affordable rent developments). Observing where families may have to live, most likely on cost grounds, is not the same as understanding their needs. This approach is likely to lead to an increase in overcrowded household and is not in accord with Policy GG 3A. Policy H12 A9 should be deleted in favour of relying on Policy H12 A1 and not increasing the inequality faced by Londoners wanting access to suitable homes.
27. In order that boroughs can meet need for an appropriate mix of housing units set out in H12 A1 there must be the option for boroughs to be able to prescribe a dwelling size mix for market and intermediate homes and therefore Policy H12 C should be deleted. To leave this Policy in the Plan will mean that boroughs will have to achieve an appropriate dwelling mix through Policies only affecting a proportion of the housing supply. The outcome is likely to be an under-provision of large family units with the adverse impacts on Policy GG 3A outlined above.
28. We do not support Policy H3C which proposes that student housing requires 3 bedrooms to count as 1 unit, when previously this has been counted on a 1:1 basis. We wish to see the Policy amended accordingly.
29. Policy H18 provides support for large scale purpose-built shared living spaces. Whilst the design and management stipulations are welcome, Local London disagrees that space standards should not apply, believes other management stipulations should go further (e.g. minimum 6 months tenancy not 3 months; affordable housing of locally determined type). These developments have all or many of the characteristics of HMOs, and compromises on quality should not be the route to affordability.

Employment Growth

30. The London Plan projects that Local London will account for 31% of London's population growth in the Plan period and proposes that it will deliver 28% of the London housing target. However, Local London is projected to have only 14% of the employment growth. On the face of it this suggests, at least at a Local London level, there will be an increase in the rate of out-commuting by residents to their place of employment. Given the scale of the Local London area this is significant and at this level of analysis the Plan's proposals do not accord with the Policies for 'Good Growth'
31. The Sub Region contains areas which suffer from some of the lowest wages in the capital and nationally (the Lea Valley and Thames Gateway in particular). It is important to secure investment in digital infrastructure and transport connections, supporting diversified employment focussed on areas of sectoral growth, such as within the knowledge economy. The strategic approach to skills and employment must be to facilitate a massive shift from low wage, low skill activities to those that are high skilled and higher income.
32. Local London welcomes the proposal that Stratford (alongside Old Oak Common) is identified as a potential future reserve for CAZ-related office space. The Policy could say more about the implications of being Future Potential Reserve in Stratford in terms of which part of the CAZ policies apply, and what added value in terms of extra infrastructure investment etc., could be applied.

London Plan Consultation Process

33. In relation to the overall London Plan process, whilst we recognise there is only one formal stage of consultation prior to the Examination in Public taking place. Local London is concerned that there is not a further opportunity in the timescale set by the Mayor to discuss in detail our comments and concerns prior to formal Examination. The Plan is a significant step change from the current Plan in terms both of the scale of the projected growth, particularly in housing, and in the spatial pattern of development proposed which will have significant impacts of the character and quality of Outer London suburban areas and also some urban ones, particularly through the impact of the small sites policy. We are mindful that boroughs were not offered the same detailed level consultation on the methodology for the allocation of small site housing growth as with the SHAMA approach to larger sites. It is an approach that has not been fully tested and scrutinised by the boroughs which have the expertise and local understanding of their areas to assist the Mayor in making informed and robust decisions about the



potential of the small sites approach to meeting housing need. Our concern is that the approach set out may be unrealistic and undeliverable. Our view is that it would be helpful to have a further round of consultation, particularly with regard to the methodology used to identify the housing supply target for small sites, with boroughs prior to the EIP to ensure the fitness of the Plan. We look forward to discussing these key issues and working in partnership with Mayor to achieve 'Good Growth'.

NOTE

This higher level response does not take the place of individual Borough responses but draws out key themes on a sub-regional basis. Boroughs' Local Plans and detailed Borough responses to the London Plan give the relevant information on the local relationship between density, character and infrastructure and the necessary local evidence with regard to , for example, SIL and LSIS in relation to residential development potential and the local economy ensuring that, collectively, Local London's growth is inclusive and sustainable

