



SUPPLEMENTARY AGENDA 1

Dear Councillor

PLANNING AND LICENSING COMMITTEE - WEDNESDAY, 21ST FEBRUARY, 2018

I am now able to enclose, for consideration at next Wednesday, 21st February, 2018 meeting of the Planning and Licensing Committee, the following reports that were unavailable when the agenda was printed.

Agenda No	Item
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| 6. | <u>Response to the Draft London Plan Consultation (Pages 3 - 10)</u> |
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Yours sincerely



Head of Paid Service

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21 February 2018

Planning and Licensing Committee

Response to the Draft New London Plan (December 2017)

Report of: *Phil Drane – Planning Policy Team Leader*

Wards Affected: *All*

This report is: *Public*

1. Executive Summary

- 1.1 This report seeks approval on a formal response from Brentwood Borough Council to the Draft New London Plan (the Spatial Development Strategy for Greater London), prepared by the Greater London Authority on behalf of the Mayor of London.
- 1.2 The proposed response conveys broad support of the Draft Plan and seeks clarification or additional information on some of the proposed policies and the approach to meeting London's full housing needs targets and the proposal for the Wider South East as outlined in section 4 of this report.
- 1.3 Given Brentwood Borough's neighbouring proximity to Greater London, there are a number of strategic planning and cross-boundary issues, such as housing, infrastructure, employment, and Green Belt.

2. Recommendation

- 2.1 To approve the response to the Draft New London Plan as set out in Appendix A.**

3. Introduction and Background

- 3.1 The Draft New London Plan (the Spatial Development Strategy for Greater London) is out to consultation from 1 December 2017 until 2 March 2018. The Draft New London Plan will run for a plan period of over 20-years from 2019 to 2041. This will be the third London Plan, the previous versions being the 2004 Plan produced by former Mayor of

London Ken Livingstone, and the 2011 Plan produced by the former Mayor of London Boris Johnson. All other iterations of the London Plan from 2004-2016 have been alterations. This New London Plan has been prepared by the Greater London Authority on behalf of the current Mayor of London, Sadiq Khan. Once the Draft New London Plan has been adopted, this will replace the current version.

- 3.2 The Draft New London Plan is at the later stages of the plan-making process. This will be the final opportunity for consultees to make representations on the London Plan prior to it being submitted for an examination in public, which according to the Local Development Scheme is expected Autumn 2018.
- 3.3 Brentwood Borough Council is duty bound to undergo the duty to cooperate with neighbouring authorities on preparation of their local plans. Although Brentwood Borough does not fall within Greater London, due to the boroughs neighbouring proximity to London and strong transport links there are a number of strategic planning and cross-boundary issues which are addressed through the duty to cooperate. The response is limited to high level comments on the portions / policies of the London Plan which have direct potential impacts on Brentwood Borough.
- 3.4 In addition to the Brentwood Borough Council representation, a joint response is to be agreed by the Association of South Essex Local Authorities (ASELA).

4. Issue, Options and Analysis of Options

- 4.1 Under the legislation establishing the Greater London Authority (GLA), the Mayor of London is required to publish a Spatial Development Strategy, known as the London Plan, and keep it under review. The London Plan sets out an integrated economic, environmental, transport, and social framework for development of London consisting of 32 boroughs.
- 4.2 The general objectives of the London Plan, and the process for developing, altering, and/or replacing the plan, are set out in the Greater London Authority Act 1999 (as amended) and supporting detailed regulations.
- 4.3 The London Plan is to focus on matters of strategic importance to Greater London, taking account of the principle purposes of the GLA, which are:

- a) Promoting economic development and wealth creation in Greater London;
- b) Promoting social development in Greater London; and
- c) Promoting the improvement of the environment in Greater London

4.4 The London Plan brings together the geographical and locational aspects of the Mayor's other strategies, including those dealing with:

- a) Transport;
- b) Environment;
- c) Economic development;
- d) Housing;
- e) Culture; and
- f) Health and health inequalities.

4.5 According to the Greater London Housing Need Assessment 66,000 dwelling per annum (or 1,386,000 total) is required over the plan period (2019 to 2041) to meet the housing needs of the 32 London Boroughs. However, according to the Land Availability Assessment 65,000 dwellings per annum can be met. This leaves 1,000 dwellings per annum (which equates to 21,000 total for the plan period) that need to be accommodated elsewhere. It is proposed that the Council should welcome the commitment made through the London Plan to meet ambitious housing targets. However, clarification is sought as to how the London Plan will address the 1,000 dwellings per annum that cannot be accommodated within Greater London. Furthermore, it is noted that the previous London Plan failed to meet its housing targets, and therefore concerns are raised as to how any future failure to meet housing needs will be managed and the procedure for triggering a review of the plan.

4.6 The London Plan refers to Opportunity Areas, which are considered to have the greatest potential for development over the plan period. The plan states that Opportunity Areas are *“significant locations with development capacity to accommodate new housing, commercial development and infrastructure (of all types), linked to existing or potential improvements in public transport connectivity and capacity. Opportunity Areas typically contain capacity for at least 5,000 net additional jobs or 2,500 additional homes or a combination of the two.”* Many of London's growth corridors have links beyond London's boundaries. The London Plan clearly states that collaboration with the Wider South East partners outside London's boundaries will help to secure mutual benefits. However, it is not defined as to who these Wider South East partners are and what the process will be for future discussion and joint working. This

could have an impact on Brentwood's Local Development Plan, and therefore the Council should welcome further discussion through the Duty to Cooperate on the details of the Wider South East (Policy SD2: Collaboration in the Wider South East and SD3: Growth Locations in the Wider South East and beyond).

- 4.7 The Draft New London Plan confirms the Mayor of London's commitment to protecting the Green Belt, where it states that the London Plan *"aims to accommodate all of London's growth within its boundaries without intruding on its Green Belt or other protected open spaces"* (2.3.1). It is proposed that the Council raise concerns about this Green Belt policy considering it may have a negative impact on the ability of the London Plan to achieve London's full housing needs. This is relevant because London's surrounding local planning authorities, such as Brentwood Borough, have had to undertake assessments of Green Belt to determine where land release is appropriate in order to meet local housing needs.

5. Reasons for Recommendation

- 5.1 The Draft New London Plan is at the final stages of the plan making process. The plan is expected to be submitted for an examination in public in Autumn 2018. This will be the Council's final opportunity to make representations regarding the London Plan.
- 5.2 It is considered appropriate that Brentwood Borough Council express general support for the draft London Plan, whilst seeking clarification and additional information on some of the proposed policies regarding the approach to meeting housing targets and proposals for the Wider South East.

6. Consultation

- 6.1 The Draft New London Plan (the Spatial Development Strategy for Greater London) is available for public consultation from 1 December 2017 to 2 March 2018.

7. References to Corporate Plan

- 7.1 The London Plan will have an impact on the emerging Brentwood Local Development Plan, the preparation and adoption of which is a corporate priority. Ongoing joint working will be required as part of plan-making in Brentwood and London.

8. Implications

Financial Implications

Name/Title: Jacqueline Van Mellaerts, Financial Services Manager

Tel/Email: 01277 312829/jacqueline.vanmellaerts@brentwood.gov.uk

- 8.1 None directly arising from this report.

Legal Implications

Name/Title: Daniel Toohey, Head of Legal Services and Monitoring Officer

Tel/Email: 01277 312860/daniel.toohey@brentwood.gov.uk

- 8.2 The Localism Act 2011 places a legal duty on local planning authorities and other defined local bodies to engage constructively, actively and on an on-going basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters. It is not a duty to agree, but local planning authorities must make every effort to secure the necessary cooperation before they submit their Local Plan for examination. The cooperation should produce effective and deliverable policies on strategic cross boundary issues.
- 8.3 Whilst the Duty to Co-operate applies to the Mayor of London, the London Plan itself is not covered by the definition of a Development Plan Document. The process of preparing the Plan is therefore not subject to the Duty to Co-operate. However, it is subject to the Mayor's duties to inform and consult. Engagement with authorities outside London is also addressed in specific policies of the London Plan.

9. Background Papers

- 9.1 Draft New London Plan (the Spatial Development Strategy for Greater London), Greater London Authority, December 2017

10. Appendices to this report

Appendix A: Response to the Draft New London Plan, Brentwood Borough Council, February 2018

Report Author Contact Details:

Name: Phil Drane, Planning Policy Team Leader

Telephone: 01277 312610

E-mail: phil.drane@brentwood.gov.uk

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Brentwood Borough Council response to: Draft New London Plan (2017) February 2018

Principle

1. Thank you for inviting Brentwood Borough Council to provide comments as part of the Draft New London Plan (the Spatial Development Strategy for Greater London). Although Brentwood does not fall within the Greater London Area boundary, given the boroughs neighbouring proximity to London there are several shared strategic planning and cross-boundary issues such as housing, Green Belt, and transport. It is important that such issues are addressed through collaborative working and meaningful discussions in accordance with legislation, the National Planning Policy Framework (NPPF) and Planning Practice Guidance.
2. Please note that we have limited our response to high level comments addressing the strategic planning matters which affect both our areas.

Strategic Planning Matters

3. Greater London and Brentwood Borough Council share several strategic planning matters that affect both our areas, such as housing, Green Belt and infrastructure. We welcome the Mayor of London's vision to secure "good growth", which is defined as economically and socially inclusive growth and more genuinely affordable homes, which is supported by the Council.

Draft new London Plan Housing Needs and Targets

4. The Greater London Housing Need Assessment identifies a housing requirement of 66,000 new dwellings per annum for over the plan period (2019-2041) spread across the 32 London Boroughs. According to the Land Availability Assessment 65,000 new dwellings per annum can be met. This leaves 1,000 dwellings per annum (or 21,000 new dwellings over the 20-year plan period) which will need to be provided outside the City of London's administrative boundaries. Brentwood welcomes the commitment made in the London Plan to meet ambitious housing targets, however clarification is needed as to how the London Plan will address the 1,000 dwelling per annum that cannot be accommodated within Greater London. The Council raises concerns about the ability of the London Plan to meet identified housing targets considering how the previous London Plan has failed to meet its housing targets. Therefore, clarification is sought as to how housing targets will be managed and the procedure(s) for triggering a review.

Opportunity Areas, Collaboration in the Wider South East and Growth Locations

5. The London Plan identifies 'Opportunity Areas' as being areas with the greatest potential for development "*containing the capacity for at least 5,000 net additional jobs, or 2,500 additional homes or a combination of the two*". The London Plan identifies the

Wider South East as a potential Opportunity Area, and states that the Mayor of London will work with “willing partners”, however these partners are not identified in the plan. Given Brentwood Borough’s proximity to London and strong transport links it is assumed that Brentwood Borough is considered as part of the Wider South East. This could have an impact on the Brentwood’s emerging Local Development Plan and therefore the Council would welcome further discussions through the duty to cooperate on the details of the WSE (Policy SD2: Collaboration in the Wider South East and SD3: Growth Locations in the Wider South East and beyond).

6. The Draft London Plan confirms the Mayor of London’s commitment to protecting the Green Belt where it states that the London Plan “*aims to accommodate all of London’s growth within its boundaries without intruding on its Green Belt or other protected open spaces*” (2.3.1). The Council acknowledges the importance of protecting the Green Belt. However, the Mayor’s Green Belt policy is likely to have a negative impact on the London Plan’s ability to achieve its housing targets. Local planning authorities restricted by Green Belt, such as Brentwood Borough (with 89% of the total borough area being within London’s Metropolitan Green Belt), are expected to conduct a reviews and assessments of the ongoing purpose of the Green Belt in their area and to determine whether the release of land would be appropriate to achieve local housing needs. Consideration of the wider role of London’s Metropolitan Green Belt is required, not considering administrative boundaries.

Duty to Cooperate

7. Brentwood Borough Council welcomes the opportunity to discuss the London Plan, in particular regarding details of shared cross-boundary issues in the Wider South East and proposed Opportunity Areas.
