



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.
