

Draft London Plan EiP 2019

London Borough of Bromley Written Statement

Matter 10

Should the vast majority of London's development needs be met within London?

a) Is the approach of seeking to accommodate the vast majority of identified development requirements between 2019 and 2041 within London justified and would so doing contribute to the objective of achieving sustainable development?

b) Alternatively, would accommodating more of London's development needs in the wider South East and beyond better contribute to the objective of achieving sustainable development?

c) If so, is there a realistic prospect that such an approach in London and the wider South East could be delivered in the context of national policy and legislation?

Comment

a) Is the approach of seeking to accommodate the vast majority of identified development requirements between 2019 and 2041 within London justified and would so doing contribute to the objective of achieving sustainable development?

Bromley Council's response to the principal question of Matter 10 is no, the approach is not justified. This response is based on the impact of the Overall Spatial Development Strategy on Outer London, in particular using housing development Bromley Borough as a 'case study'.

Bromley's response echoes a concern raised by the 2014 FALP Inspector when he recommended that the London housing target should be 42,000 dpa. In commenting on an almost identical strategy of 'growth containment' within London, he cautioned that:

'However, the strategy has significant and potentially serious implications for delivery and for existing communities which will have to face the consequences of intensifying development in the existing built up area.'
(FALP para 55)

The latest draft London Plan in effect continues the same Overall Spatial Development Strategy as caused concern during the FALP process, but with an even more ambitious housing target. As Bromley Council will expand upon in Matter 20, the Draft London Plan's (DLP) key housing component of the Overall Spatial Development Strategy rests upon an untested hypothesis that a dramatic increase in homes will be completed on Small Sites. Whilst the DLP's approach of seeking to

accommodate the vast majority of identified development requirements, particularly housing, within London is understandable, it is not justified as it is not 'sustainable development' as defined by the NPPF.

Specifically, the DLP's proposals for Small Sites are inconsistent with Section 12 of the NPPF 'Achieving Well Designed Places' including paragraph 127. Under Matter 20, Bromley Council shows evidence from dismissed appeals on Small Housing Sites that indicate conflicts between the NPPF and the DLP Overall Spatial Development Strategy in relation to Small Housing Sites.

- b) *Alternatively, would accommodating more of London's development needs in the wider South East and beyond better contribute to the objective of achieving sustainable development?*

The Council's response to this question has two main elements: - the implications of Green Belt policy and the opportunities to accommodate development in the Wider South East. The Metropolitan Green Belt is an overt containment policy. Its origin is in the 1920's proposals of Raymond Unwin, through the 1930's London Green Belt Act, Patrick Abercrombie's London Plan of the 1940's, the New Towns programme, Green Belt Circular 42/55, PPG2, the NPPF and the current London Plan. It is set to continue under the draft London Plan. However, it is set to continue without the previous initiatives that complemented the containment of London by the Green Belt. When London's demographics show household growth, that approach is the root of a problem. In short, we have a Green Belt containment policy, household growth projected in London, but no proposals to meet London's growth beyond the Metropolitan Green Belt.

The fact that numerous discussions have taken place is of little comfort to the existing communities which have to face 'the consequences of intensifying development in the built up area'. Unfortunately, the 2017 DLP's Overall Spatial Development Strategy repeats the approach which led the FALP Inspector to recommend a target of 42,000 dpa. In the circumstances, one option is for the Panel to likewise recommend a housing target that is less than the DLP target of 66,000 in the interests of the existing communities. After all, there is an absence of convincing evidence that the serious implications of the additional development for communities in the existing built up area has been properly assessed and Bromley Borough is in the 'front line' of the areas most impacted by change.

As the Wider South East discussions have not yielded prospective development, the more detailed analysis of 'sustainable development' has not taken place. However, in principle, accommodating London's development needs in the wider South East beyond the Metropolitan Green Belt could better contribute to the objective of achieving sustainable development because it could accord with the NPPF as a whole.

- c) *If so, is there a realistic prospect that such an approach in London and the wider South East could be delivered in the context of national policy and legislation?*

There is a realistic prospect that such an approach could be delivered in the context of national policy and legislation. The evidence for this is provided by completed initiatives and by potential development proposals. There is a history over many years of development for London, but beyond the Metropolitan Green Belt. The New Towns programme is an example of this.

The Thames Gateway initiative shows that it is possible to complete sustainable development on a regional scale that meets shared objectives across the London and County locations. Following on from Thames Gateway, the Thames Estuary Growth Commission (March 2016) has proposed 1 million new homes in that part of the South-East Region. In the 2016 Budget, the Chancellor of the Exchequer announced the Thames Estuary 2050 Commission which subsequently launched a “call for ideas” [Thames Estuary Commission Call for Ideas July 2018](#). It spans London and the South East and its report of 2018 therefore reflects delivery in the context of recent national policy and legislation. The Commission’s work focussed on six work streams. One of these is:

‘14. Creating new homes and communities

- a. *What barriers exist to creating high-quality communities where people want to live, work and visit?*
- b. *What specific locations offer the most potential for new homes and how should these be prioritised?*
- c. *How can the quality of associated social infrastructure be maximised?*
- d. *How can growth in the region be achieved whilst meeting the UK’s long-term emissions reduction targets and enhancing the region’s natural assets?’*

The Commission published its ‘2050 Vision’ report in June 2018

[Thames Estuary Commission 2050 Vision, June 2018](#). Its findings on ‘homes’ are as follows:-

‘Homes: *A minimum of 1 million homes will be required to support economic growth in the Thames Estuary by 2050. This equates to 31,250 homes per annum. The Commission believes that the scale and pace of delivery will need to increase to meet this demand. In terms of the distribution of these homes, based on the Ministry of Housing, Communities and Local Government’s standardised methodology for calculating housing need, around two thirds of these homes should be delivered in east London. The Commission believes that solely focusing on homes in London is unsustainable and that more of these homes should be provided in Kent and Essex.’*

The Commissioner’s 2050 Vision therefore does propose development outside London to meet London’s needs. It believes that more homes should be provided selectively in Kent and Essex. (Thames Estuary 2050 Growth Commission (June 2018): Homes p4).

Therefore, there is a realistic prospect that the approach set out in Matter 20 (c) can take place for example in the Thames Estuary area of London and the South East.

The London Plan's Integrated Impact Assessment [NLP/CD/04] provides a further reference point. It shows that the Preferred Option 2 'Sustainable Intensification' (p. 46) and the 'Current London Plan and City Region approach' (p. 52) options are not substantially different from one another. In the Council's view the differences might be overcome by co-locating new housing and employment opportunities. Unfortunately, the IIA framework does not explicitly address the principal reason given by the FALP Inspector for reducing the FALP London Housing Target – the impact of intensification in London's built up area on existing communities 'FALP Inspector's Report' (paragraph 55). This is a significant omission given that Housing Targets are invariably a key issue for strategic plans and this omission should be taken into account in the London Plan's Overall Spatial Development Strategy.

Proposals for development are emerging for an Cambridge, Milton Keynes and Oxford growth "arc" [NIC report, February 2018](#) . At Ebbsfleet, completed and proposed development is an example of what the London and Wider South East initiatives can achieve. [Ebbsfleet Development Corporation](#) .

In applying the London Mayor's Integrated Impact Assessment (IIA) to the choice of the Overall Spatial Development Strategy, several conclusions appear to have been arrived at that should be scrutinised further.

Extracts from the IIA Appraisal of the Strategic Options (2) and (5) is attached as **Appendix 1**.

The GLA response to Option 2:-

- i. Makes no mention of the potentially serious implications for London's existing communities or the consequences of intensifying development in the built up area;
- ii. Conversely, it claims that Option (2) will support the protection and enhancement of the natural environment whilst the intensification approach will surely add to pressure on the natural environment (e.g. small open spaces and residential gardens);
- iii. Co-location of additional homes and employment could take place outside as well as inside London and;
- iv. Option (2) is likely to place greater residential development pressure on existing employment sites leading to loss of employment floorspace.

The harm caused by intensification on small sites is not adequately analysed. This casts doubt on the claimed benefits of the preferred Option (2).

In short, cross London and South East initiatives have a proven delivery record and they can bring about sustainable development on a wider scale.

APPENDIX 1

London Plan Integrated Impact Assessment 2017 [NLP/CD/04] extracts

Appraisal of Strategic Options

Making the best use of land

Option 5 - Current London Plan and City Region approach

This option continues with the objectives set out in the current London Plan and also supports investment in development and growth outside London, into the Wider South East (WSE) region to achieve mutual benefits.

Long term positive objectives would result in the delivery of housing in the WSE region, resulting in associated health benefits as new homes are less likely to suffer from cold, damp and other structural issues. The provision of new housing would also alleviate problems related to homelessness and overcrowding. However, the level of development required in London is unlikely to be satisfied by adopting this approach.

Green spaces would benefit from this option, ensuring that natural capital is protected and enhanced, increasing access to the natural environment around London and providing the associated health and wellbeing benefits associated with access to green space.

The option promotes positive effects on infrastructure and land use objectives, delivering improved infrastructure throughout London and the WSE region. This would have positive economic benefits since it would make businesses more accessible, thereby increasing their competitiveness, however it may drive growth out of London.

Increasing transport between London and the WSE region would result in negative air quality and climate change impacts, since growth would be encouraged over a wider area thereby increasing the need for transport of increasing amounts of goods, waste, and individuals over a larger area, which would increase emissions and decrease air quality.

Appraisal and recommendations

Implementation of this option would facilitate housing delivery in large scale Opportunity Areas, town centres and across the WSE region. This could help to meet the long term housing needs of London, and capitalise on existing strategic transport infrastructure. High quality, new housing could respond to a range of existing pressures, including homelessness and overcrowding, and improve overall health and wellbeing. There is however uncertainty surrounding housing prices, which could rise as a result of housing needs in the city not being met, and in turn displace key workers or lower income communities.

Similarly, investing in growth locations in the wider regions could detract from considering smaller, more local sites for housing. This could delay housing delivery in meeting immediate demands. The delivery of infrastructure across London and the WSE would support mutual benefits for both London and surrounding regions, through the sustainable use of land and delivery of strategic infrastructure. This option would increase the amount of land available for new industry and economic growth. In particular, this could help to lower costs, and open up opportunities for small businesses. This would help facilitate that generation of new businesses and jobs. However this option could also have negative economic effects, by driving some economic growth out of London.

This option supports the protection of natural capital and heritage assets within London by offering an alternative location for business and housing across the WSE, ensuring the protection of green belt land and heritage assets. This will help to ensure the protection of the natural environment and associated habitats and species. It could also help to encourage wider access to nature in London, and promote a range of health benefits. However, this option could create adverse impacts on air quality and climate change, by increasing commuting and the overall need for transport across London and the WSE. By dispersing growth in the WSE, it would increase the need to transport goods or waste, leading to increased emissions and associated poor air quality.

GLA response

Option 2, Sustainable intensification, was chosen as the preferred option. Many of the aims of this option are incorporated into Option 2, however there is a focus on delivering high density developments in London rather than using the WSE. This option still includes similar objectives, supporting the CAZ, NIOD and town centres and delivering residential-led, mixed use developments. However, to support growth in London, where space is limited, Option 2 also promotes the high density developments, increased active travel, the co-location of complementary residential and industrial units and the use of small sites across London to deliver infrastructure.

Preferred option (Option 2) - Sustainable Intensification

This is the preferred option to meet this Strategic Policy. It seeks to ensure that economic growth is focussed around the CAZ, Isle of Dogs, Old Oak Common and Stratford, alongside town centres and inner and outer London. It aims to ensure that housing is delivered in residential-led Opportunity Areas, town centres, and other sites throughout London.

Housing-led mixed use redevelopments would support a design-led approach to maximise densities in town centres, especially areas with high connectivity to public and active transport. This option would maximise available development through the intensification of existing sites as well as the identification of additional development potential.

This option supports the protection of natural and cultural capital, committing to provide 50% green cover across London and protecting local spaces. Transport

growth would be strategic, through investment in active and public transport infrastructure. Industrial land would be managed to make more effective use of existing floor place, and place residential land near to complementary industries.

This option would help preserve existing open space supporting social objectives and encourage active transport to deliver health benefits and reduce emissions. Housing delivery objectives would be met with a design-led and needs-based approach to housing development, alongside provision of transport infrastructure, to underpin sustainable growth in brownfield sites, and inclusivity.

Economically, this option supports the delivery of business and residential space to keep London competitive, encourage efficient use of land, and ensure growth and economic diversification is facilitated. In promoting public and active transport options, this option reduces emissions and noise, and improves air quality.

Green infrastructure would facilitate habitat, species, and landscape protection even in built up areas. This option commits to providing London with 50% green space cover, which could off-set any increased flood risk caused by high density developments.

Appraisal and recommendations

The preservation of open space, such as green belt land, can be used for a range of social activities including community activities and physical exercise, delivering social and health benefits and increasing community cohesion. The strong emphasis on preserving green spaces requires the greater optimisation of existing brownfield land resources to meet a range of housing, economic and community needs.

This option supports the delivery of high density development, underpinned by high quality transport infrastructure and a design-led approach to ensure growth is inclusive and meet the needs of the community. This option supports a diverse range of housing delivery options, considering a variety of spaces which can provide homes, not just large-scale developments. This would provide opportunities for smaller building firms and meet housing demands more quickly than large scale developments. This option ensures brownfield sites are used effectively and designs are appropriate to improve the character of the wider area.

This option would also support the delivery of strategic transport infrastructure which underpins sustainable growth and ensures inclusivity through the consideration of PTAL and ATAL, allowing people to access the wide range of opportunities London has to offer. The efficient use of land, particularly through the co-location of complementary services, infrastructure and residential units, will ensure that London can continue to grow and diversify its economy within limited space. Importantly, intensification and co-location will help to accommodate the long term housing and employment needs of London, and strengthen future competitiveness.

The delivery of smaller sites would also support smaller business, particularly building firms, further diversifying the economy of London. The strategic location of businesses and residential units, alongside investment in social and transport

infrastructure, can help to remove barriers to employment and increase the wider workforce.

This option would also result in positive environmental effects. Increased public transport use and the promotion of active travel would contribute to improvements in air quality by reducing private vehicle use and associated emissions. Similarly, associated traffic noise would also decline and good design can further help to ensure the number of people exposed to high levels of noise is in decline.

Protecting and increasing green and open space and the use of green infrastructure would facilitate the protection of habitats, species and landscapes and increase access to nature across London, even in the most built up areas. The promotion of high density and development and small sites across London may limit runoff and consequently impact flood risk across London. This option does however promote the protection and enhancement of green and open space to 50% green space coverage, which may mitigate this impact.

The overall impacts of high density development, in combination with optimised land uses on flood risk and associated management, remains uncertain. This option may impact the viability of heritage assets by promoting high density development across London and facilitating growth in town centres. High density developments should ensure historical assets are protected and respected as they form an important part of London's heritage and are a main attraction for tourists to London. Many assets are found in town centres and form an important part of local character of the area.

GLA response

This option was chosen as the preferred option. It ensures the delivery of a wide range of environmental, economic and social benefits. It ensures land is used efficiently and effectively, it removes barriers to employment, considers community needs in the design of new developments and supports the protection and enhancement of the natural environment. This would contribute to wider economic benefits, ensuring London remains and productive and attractive city for all.