



ORGANISATION	LONDON FIRST
ID	1588
MATTER	M10 OVERALL SPATIAL DEVELOPMENT STRATEGY

M10. 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?

1. London First supports the overarching objective to prioritise brownfield land and intensify the existing built-up area of London based upon an infrastructure-led growth strategy. The authorities outside London, in the wider South East, also need to accommodate significant levels of growth and are faced with significant environmental constraints.
2. London First believes we should have a strategic policy framework which enables London to meet as much of its growth needs as practicable within the GLA boundaries. However, it must be recognised that the administrative boundary of London is relatively permeable and arbitrary and London’s housing and economic markets extend far beyond that boundary into the wider South East.
3. We have a number of concerns about the assumptions that underpin the growth strategy and the detailed policies that seek to achieve the development targets in the draft Plan. The draft Plan has ambitious targets for housing and commercial development. We believe that, as currently drafted, a number of its policy approaches on strategic issues will constrain London’s ability to meet those targets. This is because the draft Plan adds unnecessary complexity to the planning process, which in turn increases costs and the amount of time it takes to obtain planning permission in London. It risks inhibiting delivery and undermining the Good Growth objectives.
4. London First believes that the key risks to land supply in the draft Plan are:
 - a. **Small sites** – The growth strategy is overly reliant on small sites to achieve the Plan’s ambitious housing target. The London-wide 10-year target for small sites in Table 4.2 of the draft Plan is 245,730 net

housing completions, which equates to 37.84% of the overall London-wide 10-year targets for net housing completions. This is based on the assumption that a rate of delivery and level of density can be achieved which far exceeds the rates or densities that have historically been delivered on small sites, and is not justified by adequate evidence. The 2017 London Strategic Housing Land Availability Assessment (SHLAA) assumes the rate of delivery on small sites will double by including a small sites windfall figure as a component of future supply as well as a small sites modelled figure (ref: Table 9.1 of the SHLAA) despite the fact that they are essentially the same thing because small sites are not identified/allocated. Also, a lot of work is required by the boroughs to implement the small site strategy and there will be a time lag after the Plan is adopted in 2019.

- b. **Green Belt** – The draft Plan is inconsistent with NPPF1 and NPPF2 in that it does not allow changes to the Green Belt boundary in exceptional circumstances through the Local Plan process. While it is right that strong protection of the Green Belt remains, as currently worded Policy G2 does not even allow for land swaps which may result in a better overall spatial strategy for London.
 - c. **Intensification of industrial land** – London First supports the intensification of industrial and commercial activities to make more efficient use of land for housing and other development. The SHLAA does not provide any detailed information on the extent of supply expected to be released from industrial land, but one has to assume that it is expected to make a meaningful contribution towards the 55% increase in housing targets (65,000 dwellings per annum compared to 42,000 dpa in the current Plan). The growth strategy is therefore dependant on the successful delivery of Policy E7 to achieve its targets. Multi-layering and co-location are only attractive to certain types of occupiers, and currently the draft Plan does not sufficiently incentivise developers to take on this risk.
 - d. **Design-led approach to density** – We support the draft Plan giving the boroughs flexibility to tailor policies to suit their local areas, but we have serious concerns that Policy D6 as currently worded gives the boroughs that are resistant to intensification scope to resist the higher densities needed and therefore undermine the spatial growth strategy. Policy D6 should make it clearer that there is a presumption the boroughs should seek to intensify the use of land and there is clear strategic support for boroughs that want to promote the intensification agenda.
5. Therefore, the approach is justified in principle. However, it will not contribute to the objective of achieving sustainable development if the above factors

undermine the delivery of the growth strategy and London cannot, as a result, deliver the homes and jobs that it needs to house its growing population, fill the housing backlog, and ensure it remains economically competitive.

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?

1. London First supports the Mayor's objective to try and accommodate the majority of the development that London needs within its confines, but this is predicated on two things: firstly, robust and effective Spatial Development Strategy policies and, secondly, the authorities in the wider South East meeting their own development needs, in particular objectively assessed housing need.
2. London cannot be looked at in isolation. In terms of housing demand and supply, and job opportunities, London is intrinsically linked to the wider South East on so many levels. Hundreds of thousands of people live outside the administrative boundary of London and commute into work for reasons of both choice and necessity. A surprising number also commute outwards. Analysis by AECOM of Table WU01UK in the ONS 2011 census data (Location of Usual Residence and Place of Work by Sex) indicates that while around 700,000 commuters come into London for work each day, 300,000 Londoners travel out of the capital to their place of employment.
3. Policy E5B (3) of the draft Plan and paragraph 6.7.5 (supporting text for Policy E7) of the draft Plan both encourage collaboration with other planning authorities outside of London in respect of industrial land, but the draft Plan does not place similar emphasis on collaboration in respect of housing supply. London First believes there needs to be more effective strategic working between London and the wider South East to ensure that housing, employment and infrastructure are considered holistically beyond the confines of London.
4. This point was also reinforced by the Secretary of State for Housing, Communities and Local Government, the Rt Hon James Brokenshire MP, in his letter of 27 July 2018 to the Mayor of London, which stated:

"The draft Plan does not provide enough information to explain the approach you will take to ensure your targets are delivered, including collaboration with boroughs and neighbouring areas."

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?

1. Yes, the approach to collaboration on industrial land set out in Policy E5B (3) and paragraph 6.7.5 of the draft Plan should be applicable to all forms of development. London First is not aware of any reason why such an approach in London and the South East could not be delivered.