

**HERTFORDSHIRE COUNTY COUNCIL**

**ENVIRONMENT, PLANNING & TRANSPORT CABINET PANEL  
MONDAY, 5 FEBRUARY 2018, AT 10.00AM**

**CONSULTATION BY THE MAYOR OF LONDON ON A DRAFT LONDON PLAN**

*Report of the Chief Executive and Director of Environment*

Author: Paul Donovan, Team Leader Strategic Land Use  
Tel: (01992) 556289

Executive Member: Cllr Derrick Ashley - Environment, Planning and Transport

**1. Purpose of report**

1.1 The Mayor of London is consulting on a draft replacement London Plan. The purpose of this report is to seek Panel's views on the nature and content of a County Council response to the consultation.

**2. Summary**

2.1 The Mayor of London is consulting on a completely new planning framework for London – the London Plan (the 'Plan'), covering the period 2019 to 2041. Panel were provided with an informal briefing on the Plan by the Greater London Authority (GLA) on 10<sup>th</sup> January 2018. The consultation closes on 2 March. It will be followed by an Examination in Public scheduled for Autumn 2018 and publication is expected Autumn 2019.

2.2 A copy of the Plan has been placed in the Members Room. It is made up of a comprehensive package of policies covering a wide range of issues – the scale, nature and spatial patterns housing and economic growth; the provision of affordable housing; the design of development; the provision of social, green, utilities and other infrastructure; protection and management of heritage and culture; the protection and enhancement of the natural environment; waste management; minerals supply; the approach to be taken to transport and growth/development; and so on. These policies reflect the principles set out in a core set of six 'Good Growth' policies.

2.3 The London Plan is, of course, a Plan for London and the Mayor has no planning powers that extend outside the capital. As such, the majority of the matters covered by it have little or no direct impact upon areas beyond London, even though many of underlying issues and indeed measures for dealing with these will be similar to those in surrounding areas, such as Hertfordshire. As a consequence, whilst the Plan is very comprehensive in

the issues it covers, there are relatively few issues upon which Panel may feel the County Council needs to articulate a view. Section 6 of this report rehearses a number of issues upon which the views of Panel are sought, the more substantive of which are as follows:

- general support for the package of strategies, approaches and policies and particularly the six core Good Growth policies.
- support for the commitment to meet the vast majority of London's housing needs within London.
- clarification from the Mayor relating to the scale of housing need in the period to 2029 (it appears to be substantively greater than that averaged out over the period to 2041).
- clarification from the Mayor of his intentions with regard to 1,000 homes per annum that it would appear there are no proactive proposals to plan for.
- confirmation from the Mayor that any housing delivery failure will be managed within London as part of a Full Review of the Plan, along with a commitment to how such a Review would be triggered.
- support for recognition and continuation of wider south east political liaison arrangements.
- clarification from the Mayor on his intentions with regard to looking to longer term approaches and timeframes for growth management within the wider south east.
- concerns relating to the way in which strategic infrastructure priorities (transport corridors) are presented as growth opportunities.
- support for approach to waste management and transport within and beyond London.

### **3. Recommendations**

- 3.1 The Panel is invited to consider the issues in section 6 of this report and come to a view on these and any others it recommends should be incorporated into a County Council response to the London Plan consultation. The Chief Executive and Director of Environment will prepare and submit a response, in consultation with the Executive Member for Environment, Planning and Transport, taking into account the views of Panel.

### **4. Background**

#### ***What is the London Plan?***

- 4.1 Under the legislation establishing the Greater London Authority, the Mayor is required to publish a Spatial Development Strategy (known as the London Plan) and keep it under review. As the overall strategic plan for London, it sets out an integrated economic, environmental, transport and social framework for the development of London – usually for a period of 20-25 years. The London Plan should only deal with things of strategic importance

to Greater London taking account of the principal purposes of the Greater London Authority (GLA) which are:

- promoting economic development and wealth creation in Greater London
- promoting social development in Greater London; and
- promoting the improvement of the environment in Greater London.

4.2 The Mayor must have regard to:

- the principle that there should be equality of opportunity for all people
- reducing health inequality and promoting Londoners' health
- achieving sustainable development in the United Kingdom
- climate change and the consequences of climate change
- the desirability of promoting and encouraging the use of the Thames, particularly for passenger and freight transportation
- the resources available to implement the Mayor's strategies.

4.3 The Plan brings together the geographical and locational aspects of the Mayor's other strategies and needs to be consistent with those strategies, including those dealing with:

- Transport
- Environment
- Economic Development
- Housing
- Culture
- Health and Health Inequalities

4.4 The London Plan is legally part of each of London's Local Planning Authorities' Development Plan and must be taken into account when planning decisions are taken in any part of London. Planning applications should be determined in accordance with it, unless there are sound planning reasons which indicate otherwise.

4.5 The Plan provides the strategic, London-wide policy context for borough local development plan documents. All local development plan documents and Neighbourhood Plans have to be 'in general conformity' with it.

#### ***Why is a new London Plan required?***

4.6 This is a new Plan - it is not an alteration or update to previous Plans. It will be the third London Plan, the previous ones being the 2004 Plan produced by former Mayor of London Ken Livingstone and the 2011 Plan produced by former Mayor of London Boris Johnson. All of the other iterations of the London Plan from 2004-2016 have been 'Alterations'. Once adopted this Plan will replace all previous versions.

4.7 The last set of Alterations (known as the 'Further Alterations') were published, following a public examination and endorsement by the Secretary of State,

only two years ago. Those Alterations dealt predominantly with the need for London to increase its housing targets in light of updated evidence relating to existing and projected future population and household growth and therefore need for dwellings. The Alterations recognised that the scale of projected housing need is such that a Full Review of the London Plan would be required in the near future (2016). The Alterations were seen as a short term measure to attempt to uplift housing provision as swiftly as possible in advance of the Full Review. This Plan process is that 'Full Review'.

- 4.8 The other main driver for the preparation of the Plan is that there has been a change in Mayor since the last London was published. The new Mayor has set out his new vision for the future of London in 'A City for all Londoners' and is in the process of reviewing all Mayoral strategies to reflect that vision. In the last twelve months the Mayor has consulted upon his draft Transport, Environment and Housing strategies. A new London Plan is seen as key to bringing forward the Mayor's vision for London.
- 4.9 The consultation closes on 2 March. It will be followed by an Examination in Public currently scheduled for Autumn 2018 and publication is expected Autumn 2019.

#### ***Recent Political Liaison Arrangements in the Wider South East***

- 4.10 The Inspector presiding over the Examination in Public into the Further Alterations in 2014 concluded the following in terms of the likely requirement for the Mayor to engage with local authorities beyond London, moving forward to the preparation of the Full Review of the London Plan.

*'56. The targets set in Table 3.1 will not provide sufficient housing to meet objectively assessed need and I am not persuaded that the FALP can ensure that the additional 6,600 dpa will be delivered. Nor do I consider that the Mayor can rely on paragraph 47 of the NPPF or the duty to co-operate to make London Boroughs provide more. It is not enough to grant planning permissions, homes have to be built and the target rate of 42,000 dpa is significantly higher than has been achieved since 2004 and the boom years before the recession.*

*57. The evidence before me strongly suggests that the existing London Plan strategy will not deliver sufficient homes to meet objectively assessed need. The Mayor has committed to a review of the London Plan in 2016 but I do not consider that London can afford to wait until then and recommend that a review commences as soon as the FALP is adopted in 2015 (IRC3). **In my view, the Mayor needs to explore options beyond the existing philosophy of the London Plan. That may, in the absence of a wider regional strategy to assess the options for growth and to plan and co-ordinate that growth, include engaging local planning authorities beyond the GLA's boundaries in discussions regarding the evolution of our capital city.**' [emphasis added]*

- 4.11 In advising the Mayor that he was content for the Further Alterations to be published, the Minister of State for Housing and Planning stated:

*'Recommendation 3 – early review of the London Plan*

*The anticipated growth in London's population is likely to have a significant impact on the surrounding areas. I note your obligation and welcome your commitment to work closely with local authorities and other partners in the areas outside London as part of the full-scale review of the London Plan. Authorities outside London face their own issues and challenges in meeting their own needs, which may impact upon their ability to accommodate any of London's unmet housing needs.....*

*Furthermore, I note the Inspector's suggestion that the Mayor may wish to explore options beyond the existing approach of the London Plan. I want to stress that the National Planning Policy Framework is clear that the Green Belt should be given the highest protection in the planning system and is an environmental constraint which may impact on the ability of authorities to meet their housing need.....'*

- 4.12 Following publication of the Further Alterations the process of the Mayor engaging with local authorities beyond London commenced. Two wider south east summits were convened to explore the support for, and potential nature of, any wider south east political collaboration. This process resulted in the formation of a 'Wider South East Political Steering Group' (PSG). The work of that Group to date has been focussed on addressing barriers to housing delivery and wider south east strategic infrastructure. A third Summit of Leaders was held on the 9 December 2016 at which the main focus was the impending review of the London Plan. Hertfordshire councils, including the County Council, have been represented at the Summits. Cllr L Haysey (East Hertfordshire District Council) and Cllr J Gardner (Stevenage Borough Council) are represented on the PSG.
- 4.13 Despite the expectations of the Further Alterations Inspector and the acceptance by the Minister that it may be necessary, as part of the Full Review of the London Plan, *'to explore options beyond the existing philosophy of the London Plan. That may, in the absence of a wider regional strategy to assess the options for growth and to plan and co-ordinate that growth, include engaging local planning authorities beyond the GLA's boundaries in discussions regarding the evolution of our capital city'*, that has not happened. The reason for this is that until very recently the GLA were not clear as to whether it would be possible for London to meet its housing requirements internally.

## 5. The Plan

### 5.1 The Mayor says that the Plan:

*'.....is different to those that have gone before it. It is more ambitious and focused than any previous Plans. The concept of Good Growth – growth that is socially and economically inclusive and environmentally sustainable – underpins the Plan and ensures that it is focused on sustainable development.'*

*'London's global economy is the envy of other world cities and with good reason – it is the engine of the national economy and will sustain the level of population growth expected in London over the coming years. But to plan a city that works for all Londoners, as the population grows towards 10.8 million by 2041, it will be important to think about what the purpose of economic growth actually is.'*

*A failure to consider this fundamental question has led to some of the most serious challenges London faces today. The growth in population and jobs has not been matched by the growth in the number and type of homes London needs, driving up rents and house prices to levels that have priced many Londoners out of the market. A focus on large multinational businesses in the centre of London has not been matched by economic development in other parts of the city. A failure to consider the wider implications of London's growth has increased car dependency, leading to low levels of physical activity, significant congestion, poor air quality and other environmental problems.'*

5.2 A copy of the Plan has been placed in the Members' Room. It is made up of a comprehensive package of policies covering a wide range of issues – the scale, nature and spatial patterns housing and economic growth; the provision of affordable housing; the design of development; the provision of social, green, utilities and other infrastructure; protection and management of heritage and culture; the protection and enhancement of the natural environment; waste management; minerals supply; the approach to be taken to transport and growth/development; and so on.

5.3 Each of the policy areas in the Plan is underpinned by a core set of six 'Good Growth' policies which in effect represent a summary of the overall direction of the Plan:

- **Policy GG1 Building strong and inclusive communities** – to generate a wide range of economic and other opportunities for all; provide access to good quality services and amenities that strengthen communities; increasing active participation and social integration, and addressing social isolation; ensure that streets and public spaces are planned for people; promote the crucial role town centres; well designed new buildings and the spaces; a London where all Londoners, including older people, disabled people and people with young children can move around with ease and enjoy the opportunities the city provides, etc.

- **Policy GG2 Making the best use of land** – including high-density, mixed-use places, intensifying use of land, prioritising Opportunity Areas, brownfield land, surplus public sector land, sites which are well-connected by existing or planned Tube and rail stations, sites within and on the edge of town centres, and small sites; protect London’s open spaces, including the Green Belt, Metropolitan Open Land; enabling car-free lifestyles that allow an efficient use of land, etc.
- **Policy GG3 Creating a healthy city** –improve Londoners’ health and reduce health inequalities, addressing health in an integrated and co-ordinated way; promote more active and healthy lifestyles; use the Healthy Streets Approach; assess impacts of development on the health and wellbeing of communities; improve access to green spaces and the provision of new green infrastructure; ensure that new buildings are well-insulated and sufficiently ventilated to avoid the health problems associated with damp, heat and cold; seek to create a healthy food environment, increasing the availability of healthy food and restricting unhealthy options, etc.
- **Policy GG4 Delivering the homes Londoners need** – create a housing market that works better for all Londoners; ensure that more homes are delivered; strategic target of 50 per cent of all new homes being genuinely affordable; create mixed and inclusive communities, with good quality homes; establish ambitious and achievable build-out rates, etc.
- **Policy GG5 Growing a good economy** – promote the strength and potential of the wider city region; economy diversifies and that the benefits of economic success are shared more equitably across London; plan for sufficient employment and industrial space in the right locations; sufficient high-quality and affordable housing, as well as physical and social infrastructure is provided to support London’s growth; leadership in innovation, research, policy and ideas; promote and support London’s rich heritage and cultural assets; maximise London’s existing and future public transport, walking and cycling network, as well as its network of town centres, to support agglomeration and economic activity, etc.
- **Policy GG6 Increasing efficiency and resilience** - improve energy efficiency and support the move towards a low, carbon circular economy, contributing towards London becoming a zero carbon city by 2050; ensure buildings and infrastructure are designed to adapt to a changing climate, making efficient use of water, reducing impacts from natural hazards like flooding and heatwaves, and avoiding contributing to the urban heat island effect; create a safe and secure environment which is resilient against the impact of emergencies including fire and terrorism; take an integrated approach to the delivery of strategic and local infrastructure by ensuring that public, private, community and voluntary sectors plan and work together, etc.

- 5.4 Panel had the benefit of an informal briefing on the Plan by the GLA on 10 January 2018. The consultation on the draft Plan closes on 2 March. It will be followed by an Examination in Public scheduled for Autumn 2018 and publication is expected Autumn 2019.

### ***Timeframe***

- 5.5 The new Plan will run from 2019 to 2041. This date has been chosen to provide a longer-term view of London's development to inform decision making. However, some of the more detailed elements of the Plan, such as the housing targets are set only for the first ten years of the Plan. This reflects the dynamic nature of London's land market and means that there will need to be a review of the housing targets before 2029.

## **6. Responding to the consultation**

- 6.1 The London Plan is, of course, a Plan for London and the Mayor has no planning powers that extend outside the Capital. As such, the majority of the matters covered by it have little or no direct impact upon areas beyond it. Many of the underlying issues and indeed measures for dealing with these, however, will be similar to those in surrounding areas, such as Hertfordshire. As a consequence, whilst the Plan is very comprehensive in the issues it covers, there are relatively few upon which Panel may feel the County Council will need to articulate a view. A number of the issues are rehearsed below.

### ***The Plan as a whole and the Good Growth policies***

- 6.2 The Plan covers a very wide range of planning issues – from the very strategic issues of providing for new homes and supporting the economy right down to detailed matters such as the design of streets and protection of pubs. As a package of strategies, approaches and policies, the Plan is proactive, comprehensive and challenging and Panel may feel is worthy of a broad statement of support, particularly in relation to the six core Good Growth policies.

### ***Level of Housing need***

- 6.3 The Plan identifies an annual need for 66,000 dwellings per annum (dpa). The greatest proportion of that need is determined by projecting population/household formation over the period 2016-2041. However, the housing targets within the London Plan only deal with the period 2019-2029. If one uses the same 2016 baseline and takes the 2029 timeframe for which housing targets are set – a period of 13 years - the average annual need appears to rise by at least 10,000 dpa. This represents a significantly greater level of need than that identified in the Plan and proposed to be catered for in housing targets. Clearly, not actively planning for higher levels of short term need has potentially significantly implications for both London and areas beyond.



- 6.4 Clarification has been sought from the GLA, but at the time of writing no response has been received. The Panel may feel it would be appropriate for the County Council to pursue this clarification in any response and if the scale of annual need to 2029 is indeed in excess of 66,000 dpa call for the Mayor and the Plan itself to clarify the implications of this and how they are to be managed.

### ***Meeting Housing Needs within London***

- 6.5 The Further Alterations published in 2015 identified a housing need of 49,000 dpa and a housing target of 42,000 dpa. In practice, London struggles to deliver half of its need and a recent high in delivery in 2014/15 of 32,440 was still 17,000 dpa short of the annual level of need and 10,000 dpa short of the extant London Plan target. In the period 2001/2 to 2014/15 average annual housing delivery within London was 27,444 dpa. Housing delivery failure against London Plan targets is a consistent and ongoing theme.
- 6.6 This Plan identifies a housing need of 66,000 dpa and a housing target of 65,000pa. This target is to be achieved through a range of mechanisms - maximising opportunities on brownfield sites, within opportunity areas (areas typically contain capacity for at least 5,000 net additional jobs or 2,500 net additional homes or a combination of the two), optimising housing density, intensification within Outer London, a crucial role of the town centre network, enhancing the role of small sites, mixed use redevelopment of low density car parks and retail, incremental intensification of existing residential areas, both strategic and small scale regeneration, etc. Growth is to be achieved without encroaching into the Green Belt – the Mayor strongly supports the protection of the Green Belt and of Metropolitan Open Land and there are policies to protect these from inappropriate development.
- 6.7 London is going to have to at least double annual housing delivery if London Plan targets are going to be achieved, which given the backdrop of persistent delivery failure appears very challenging. However, the Mayor sees *'London's housing crisis is the single biggest barrier to prosperity, growth, and fairness facing Londoners today'*. His draft housing Strategy and this draft Plan contain a wide range of policy and other measures designed to achieve his vision and it may well be that these two strategies combined, together with concerted effort of all partners, achieves the Mayor's desired housing delivery uplift.
- 6.8 Whilst the Plan's commitment to meet the majority of identified housing needs appears to be very challenging in the light of persistent delivery failure, Panel may consider it appropriate for the County Council to welcome the Mayor's commitment to meet the majority of London's housing needs within the Capital.

### ***Housing delivery failure?***

- 6.9 There would clearly be a range of potential serious consequences if housing delivery within London continues to fail – both within and beyond the capital (exacerbating the tendency to migrate, increasing commuting, increasing migration assumptions within official population projections, etc). The pressures placed upon areas beyond London, particularly closest to it in places like Hertfordshire, would potentially be intense. Given the scale of the challenge ahead it would seem prudent to plan for the possibility of failure and the Plan is not as clear as it might be in terms of what would happen were failure to materialise. The Mayor himself recognises that the London housing crisis *‘.....is unacceptable and I am determined to make a difference. I have been honest with Londoners from the start – we are not going to be able to turn things around overnight. This is going to be a marathon, not a sprint. But we are working hard every day and we have already started to take big steps forward’*. Even the Mayor does not appear to expect a significant change in the short and even perhaps medium term.
- 6.10 At the informal briefing for Panel on 10 January the GLA was asked what the Mayor’s response would be were housing delivery failure to materialise – would that failure be managed within London or would the Mayor be looking for support from further afield? The response was that failure would be addressed by a review of the Plan, not by placing expectations upon local authorities beyond London.
- 6.11 Regardless as to the Mayor’s position, it is possible to envisage a scenario in which local planning authorities bringing forward local plans beyond London are pressurised by some parties, and perhaps asked by Inspectors, to explain how they propose to address housing delivery shortfall within London – are they to uplift their housing targets?
- 6.12 Under these circumstances, and to offset any ambiguity, Panel may take the view it would be appropriate for the County Council to seek confirmation within the Plan (probably within both policy and supporting text) that housing delivery failure is a matter for London and would be dealt with by means of a review of the Plan. There may also be merit in also calling for the Plan to include a trigger point for the Review – a specific number of years of failure, for example.

### ***The ‘missing 1,000dpa’***

- 6.13 The Plan identifies a need for 66,000 dpa and considers it has capacity to and contains specific policies and targets to deliver 65,000 dpa. The previous London Plan, which similarly failed to proactively plan specifically for the level of identified need (but in that case the gap was 7,000 dpa), contained policy wording (*‘Boroughs should draw on the housing benchmarks in table 3.1 in developing their LDF housing targets, augmented where possible with extra housing capacity to close the gap between identified housing need.....’*) that sought to encourage London Boroughs to exceed their specific housing targets to make inroads into managing the 7,000 dpa shortfall between ‘need

for' and 'plan for'. This Plan contains no such wording and there is no clarity on the position in relation to the 'missing 1,000 dpa' homes. Clarification has been sought from the GLA, but at the time of writing, no response has been received. Panel may feel it would be appropriate to pursue this in any County Council response and call for the position to be clearly articulated in the Plan.

### ***Collaboration in the Wider South East***

- 6.14 The Plan contains two policies that are particularly relevant to authorities beyond London. The first deals with 'Collaboration' generally and the second 'Growth locations in the wider south east and beyond'. Given their obvious relevance, these policies are reproduced and discussed below.

#### **Policy SD2 Collaboration in the Wider South East**

A The Mayor will work with partners across the Wider South East (WSE) to address appropriate regional and sub-regional challenges and opportunities through recently-developed strategic coordination arrangements.

B To secure an effective and consistent strategic understanding of the demographic, economic, environmental and transport issues facing the WSE, the Mayor supports joint working with WSE partners to ensure that plan-making is, as far as possible, informed by consistent technical evidence.

C The Mayor will take account of the views of WSE partners in discharging his Duties to Inform and Consult with authorities beyond London and will respond to their Duty to Co-operate requests for views on Development Plans insofar as they bear strategically on London.

D The Mayor supports recognition of long-term trends in migration in the development of Local Plans outside London.

E The Mayor will work with WSE partners to find solutions to shared strategic concerns such as: barriers to housing and infrastructure delivery (including 'smart' solutions - see also paragraph 9.6.7); factors that influence economic prosperity; the need to tackle climate change (including water management and flood risk); improvements to the environment (including air quality) and waste management (including the promotion of Circular Economies); wider needs for freight, logistics and port facilities; and scope for the substitution of business and industrial capacity where mutual benefits can be achieved

- 6.15 The supporting text is designed to highlight some of the intimate relationships London has with its hinterland and further afield. For example:

- London is not an island and that whilst it is significantly larger than other centres in the Wider South East, it is part of an extensive and complex network of centres. The network as a whole, and the orbital and radial linkages which hold it together, comprise the most productive region in the UK accounting for nearly half its output and making by far the biggest net contribution to the national exchequer.

- the WSE is home to 24.2 million people (8.9 million in London), 10.0 million households (3.6 million in London) and 13.7 million jobs (5.7 million in London). It is projected to grow more rapidly by 2041 than other parts of the UK – in population terms by 21 per cent in London and 17 per cent in the WSE outside London. Household numbers are expected to increase by 32 per cent in London and 23 per cent elsewhere in the WSE.
- 800,000 commuters travel into London each day (more than half of the workforce in some of the local authorities bordering London and make an important contribution to its economy as well as to the commuters' own local economies when they return home.

6.16 The recognition of the existing wider south east political arrangements and the commitment to continue the collaboration to deal with shared issues is something Panel may feel the County Council could welcome and support. As the Plan progresses it would be useful for the wider south east to work together with the Mayor to make any necessary improvements to this proactive and positive policy and the narrative around it.

#### **Policy SD3 Growth locations in the Wider South East and beyond**

A The Mayor will work with relevant WSE partners, Government and other agencies to realise the potential of the wider city region and beyond through investment in strategic infrastructure to support housing and business development in growth locations to meet need and secure mutual benefits for London and relevant partners.

B The Mayor supports recognition of these growth locations with links to London in relevant Local Plans.

6.17 The purpose and intentions of Policy SD3 and its supporting text are not at all clear. The text of the policy appears to relate to investment in strategic infrastructure (presumably transport) to support growth where there are relationships to London (though the title of the policy suggests it is about growth locations beyond London). But when one turns to the supporting text, the focus seems to turn away from infrastructure and towards the delivery challenges associated with housing growth:

*'....that as far as possible sufficient provision will be made to **accommodate the projected growth within London**.....'*

*The GLA's new **Strategic Housing Market Assessment** shows that London has a need for approximately 66,000 additional homes a year. The Strategic Housing Land Availability Assessment suggests that London has the capacity for around 65,000 additional homes a year and the housing targets in this Plan reflect this.....'*

*Despite this Plan seeking to accommodate the vast majority of London's future growth, some migration will continue.....'*

*Given the pressure for growth in both London and the WSE, the barriers to housing delivery that need to be overcome to avoid a further increase of the backlog, and potential changes to projections over time, it is prudent to plan for longer-term contingencies. Therefore, the Mayor is interested in **working with willing partners** beyond London to explore if there is potential to accommodate more growth in sustainable locations outside the capital.’ This seems to start to explore the possibility of locations beyond the capital being suitable to accommodate not only growth generated there, but also some of London growth. This message is then reinforced in paragraphs that follow:*

*‘.....The focus is on locations that are (or are planned to be) well-connected by public transport and where development can help meet local growth aspirations as well as wider requirements. Recognising that investment in public transport can often bring significant benefits to wider areas, such partnerships could focus on optimising rail capacity between London, the wider region and beyond. Another area of focus could be proposals for new/garden settlements with good links to London.....’*

*.....Collaboration with willing partners can help alleviate some of the pressure on London while achieving local ambitions in the WSE for growth and development, recognising that this may require further infrastructure.....’*

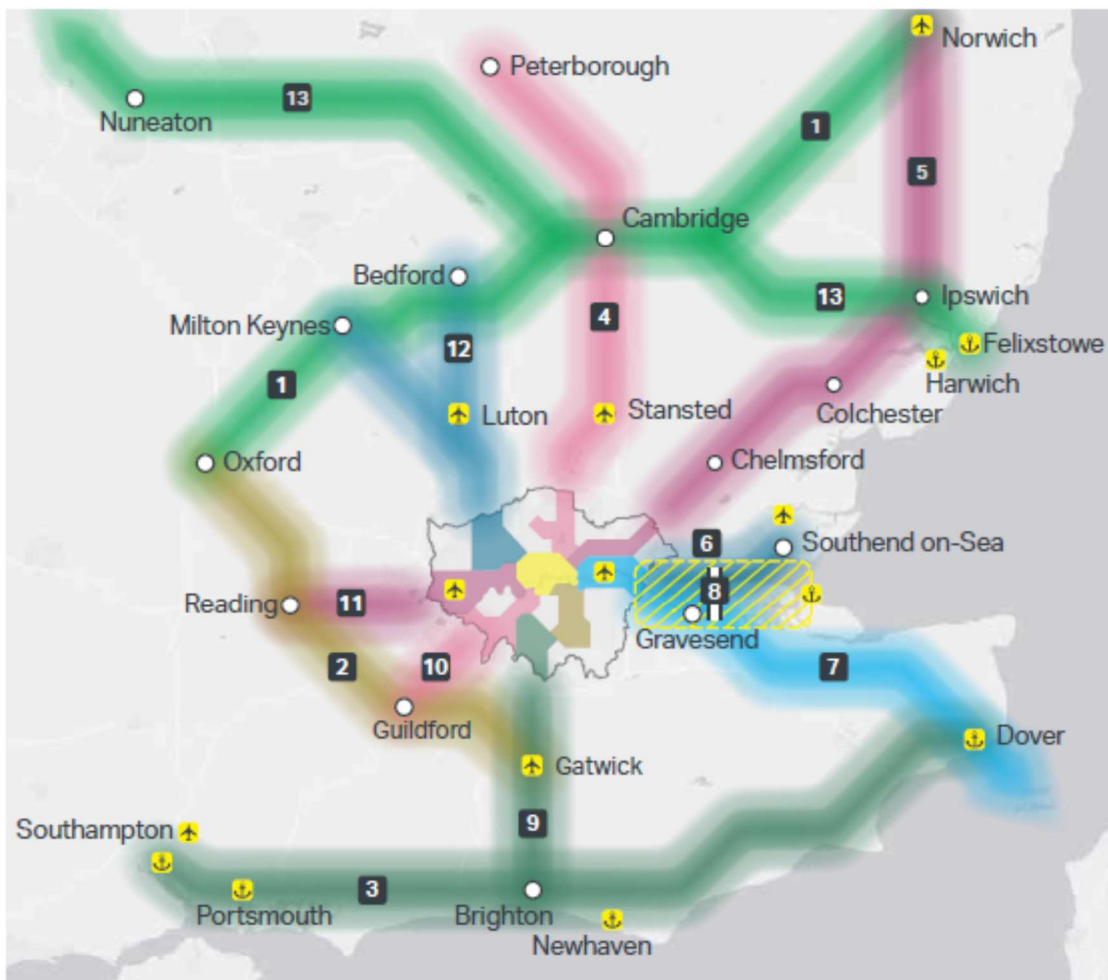
*.....The Mayor will work with key **willing partners**, including local authorities, Local Enterprise Partnerships, the National Infrastructure Commission and Government, to explore strategic growth opportunities where planning and delivery of strategic infrastructure (in particular public transport) improvements can unlock development that supports the wider city region.....’*

*.....The Mayor continues to encourage authorities outside London to become willing partners and work with the capital on opportunities for growth, where mutual interest can be achieved.’*

- 6.18 The ‘willing partners’ approach appears to relate to ‘longer-term contingencies’, though ‘longer term’ is not defined. It may well be that this whole section of the Plan is designed to pave the way for a strategic dialogue between London and the wider south east and beyond about how the next tranche of strategic growth (demographic and economic) is to be managed, including exportation of London growth, **for the period post-2029**. Reference is made, for example, to the National Infrastructure Commission being one of the ‘willing partners’ and this could reflect a view by the Mayor that initiatives such as the Oxford-Cambridge Corridor and the scale of growth potential within it represent a strategic opportunity to help address growth pressure not only within the corridor itself, but from other areas, including London. If this is the case then it resembles the very dialogue the Inspector into the Further Alterations was expecting to have happened to inform this Plan.
- 6.19 The supporting text contains a diagram of the strategic infrastructure priorities in the wider south east and beyond where the Mayor states ‘*Some of these orbital priorities may have more capacity to accommodate additional growth*

*than the radial ones*'. The Mayor appears to view these transport infrastructure priorities as potentially suitable for his 'willing partners' approach. Two of the priorities run through Hertfordshire. In developing these infrastructure priorities the authorities beyond London have been clear that their purpose is to identify infrastructure priorities, which while supporting growth, should not be construed as growth corridors. Associating these infrastructure priorities within the Mayor's approach to 'willing partners' on managing longer term growth potentially takes their scope beyond that agreed within the wider south east political arrangements.

**Figure 2.15 - Wider South East – 13 Initial Strategic Infrastructure Priorities**



**Strategic Infrastructure Priorities**

-  Airport
-  Port
-  Thames Estuary Ports
-  London Growth Areas

Source: Wider South East Partnership

Contains OS data © Crown copyright and database right (2017)

6.20 The Panel may feel it would be appropriate for the County Council to seek:

- a discussion within the wider south east political arrangements seeking clarification about what the Mayor's intentions are in relation to this section of the Plan – is it designed to commence a dialogue in relation to post 2029 scenarios;
- a redraft of the policy and supporting text to reflect that clarified position.
- the need to remove any suggestion that the strategic transport infrastructure priorities are growth priorities/corridors and perhaps the transfer of text relating to infrastructure priorities to the transport section of the Plan along with additional text about their purpose and how they are to be taken forward.

### **Waste**

6.21 In 2015 London produced just under 18 million tonnes (mt) of waste, comprising:

- 3.1mt household waste – 17 per cent
- 5.0mt commercial/industrial waste – 28 per cent
- 9.7mt construction, demolition and excavation waste – 54 per cent

6.22 In 2015, London managed 7.5mt of its own waste, exported 11.4mt and imported 3.6mt. This gives London a current waste net self-sufficiency figure of approximately 60 per cent. Around 5mt (49 per cent) of waste exported from London went to the East of England and 4.2mt (42 per cent) to the South East. The bulk of this waste was construction, demolition and excavation waste. Approximately 1.3mt of waste was exported overseas.

6.23 In 2015, 2.9mt of the waste sent to the East of England went to landfill and 2.2mt went to landfill in the South East. Some 32 per cent of London's waste that was biodegradable or recyclable was sent to landfill.

6.24 Historically, Hertfordshire has managed considerable quantities of waste originating from London – whether that be household, commercial and industrial or construction, demolitions and excavation waste.

6.25 The Plan contains a range of ambitious policies. For example:

- promoting a more circular economy that improves resource efficiency and innovation to keep products and materials at their highest use for as long as possible.
- ensuring that there is zero biodegradable or recyclable waste to landfill by 2026.

**Projected exports of Household and Commercial & Industrial waste from London (000's tonnes)**

	<b>2015</b>	<b>2021</b>	<b>2026</b>	<b>2041</b>
<b>London's arisings</b>	8,100	8,216	8,299	8,726
<b>London's exports</b>	3,449	1,725		

- municipal waste recycling target of 65% by 2030.
- construction, demolition and excavation waste recycling target of 95% per cent by 2020.
- the equivalent of 100 per cent of London's waste to be managed within London (i.e. net self-sufficiency) by 2026 ['Managed' meaning waste is used for energy recovery, the production of solid recovered fuel (SRF), or it is high quality refuse-derived fuel (RDF) sorted or bulked for re-use (including repair and re-manufacture), reprocessing or recycling (including anaerobic digestion), reused, recycled or reprocessed].

6.26 There are also policy and other commitments to matters such as safeguarding of waste facilities; the suitability of strategic industrial locations and locally significant employment sites/land for waste uses and the need to protect such areas from housing and mixed use development; requirement for boroughs to allocate sufficient land to waste apportioned to their areas; the need for careful design of development adjacent to waste to minimise the potential for disturbance and conflicts of use; and so on. The Plan also recognises the important work undertaken by the Waste Technical Advisory Bodies and both supports and encourages the continued working to address cross boundary issues. These policies aspirations and commitments and commitment to joint working are very much in line with the County Council's approach to waste management. As such Panel may consider there would be merit in a broad statement of support from the County Council as an adjacent Waste Planning Authority. Despite these policies, London will continue to export waste, for example in the form of solid recovered fuel, refuse-derived fuel (RDF) and construction, demolition and excavation waste. Given the scale of growth and change proposed for London within the Plan, there are likely to be a challenging levels of future construction, demolition and excavation waste from the major infrastructure and regeneration projects.

6.27 The Plan states in the text supporting waste policies that London produced 324,000 tonnes of hazardous waste in 2015 and that there is a major risk of shortfall for this type of facility regionally. Given this risk Panel might feel it would be appropriate to recommend that a specific policy be included within the Plan dealing with this issue.

***Minerals***

6.28 The Plan contains policies to safeguard aggregates resources and aggregates infrastructure (including aggregates recycling, railheads, wharves), the maintenance of a landbank of land won aggregates, encouraging re-use and



recycling of construction, demolition and excavation waste within London, requirements to reduce the environmental impacts of aggregate. Such policies are in-keeping with the County Council's approach to aggregates provision and as such Panel may consider there would be merit in a broad statement of support from the County Council as an adjacent Minerals Planning Authority.

### ***Transport***

- 6.29 The main mechanism through which the Mayor proposes to manage London transport is within his Transport Strategy. This Plan therefore focusses more on those matters under the control of the planning regime that can contribute to the aspirations and policies within the Transport Strategy. These include:
- rebalancing the transport system towards walking, cycling and public transport, including ensuring high quality interchanges, to reduce Londoners' dependency on cars.
  - strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041.
  - the need to develop effective transport policies and projects to support the sustainable development of London and the Wider South East as well as to support better national and international public transport connections.
  - supporting the delivery of a London-wide network of cycle routes, with new routes and improved infrastructure minimum cycle parking standards, reduced parking provision, maximum car parking standards, etc.
- 6.30 The Mayor's approach to transport within his package of Strategies is very much in-keeping with the County Council's approach within the emerging Local Transport Plan 4. As an adjoining transportation authority, Panel may feel it would be appropriate to offer broad support to the approach proposed within the Plan and the recognition of the need for managing transport issues across boundaries.

### ***The Economy***

- 6.31 The Plan contains a range of policies designed to support the projected growth of all sectors of the London economy – offices, low cost business space, industry, logistics and service sectors, designation of strategic industrial locations, requirements to designate locally significant industrial sites, etc. The main thrust of the Plan is for the planning regime to positively plan for the development requirements of the London economy as it changes over time.
- 6.32 The one specific exception to this approach is in relation to industrial land. The Plan commits to the provision of a sufficient supply of land and premises in different parts of London to meet current and future demands for industrial and related functions and no net loss of industrial floorspace capacity. However, a key approach to industrial land is to encourage industrial intensification, colocation and substitution. In this context, 'substitution' includes the *'substitution of some of London's industrial capacity to related property markets elsewhere in London and beyond London's boundary'*. The

Plan is clear that this should only happen, amongst other matters, where it results in mutual advantage and full regard is given to both the positive and negative impacts. It should only be considered as part of a plan-led process of consolidation and intensification and not through ad hoc planning applications.

- 6.33 Whilst an issue having cross-boundary implications for Hertfordshire, the approach is based upon mutual advantage and managed strategically. The Panel may feel a County Council response could note the approach and reinforce the need for proper consideration of positive and negative impacts.

## **7. Hertfordshire Infrastructure and Planning Partnership/East of England Local Government Association**

- 7.1 At its meeting on 15 January 2018 the Hertfordshire Infrastructure and Planning Partnership agreed that the Hertfordshire authorities should prepare a response to the consultation. Over the coming weeks there will be a dialogue within Hertfordshire about the key issues the local authorities will need to respond on. There are also officer and member arrangements within the East of England which will be considering what response should be made (by the East of England Local Government Association) to the Mayor from an East of England perspective. Both these processes may generate additional issues which, whilst coming forward post-Panel, it may be appropriate to incorporate into a County Council response, subject to them not conflicting with the overall tenor of any response as agreed by Panel.

## **8. Financial Implications**

- 8.1 There are no financial implications as a result of this report.

## **9. Equality Implications**

- 9.1 When considering proposals placed before Members it is important that they are fully aware of, and have themselves rigorously considered the equality implications of the decision that they are making.
- 9.2 Rigorous consideration will ensure proper appreciation of any potential impact of that decision on the County Council's statutory obligations under the Public Sector Equality Duty.
- 9.3 The Equality Act 2010 requires the County Council when exercising its functions to have due regard to the need to (a) eliminate discrimination, harassment, victimisation and other conduct prohibited under the Act; (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it and (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it. The protected characteristics under the Equality

Act 2010 are age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion and belief, sex and sexual orientation.

- 9.4 No decisions are being made. An Equalities Impact Assessment has been undertaken of the Plan by the GLA.

*Background Information*

The London Plan - The Spatial Development Strategy for Greater London – Draft for Public Consultation – December 2017