



CHILTERN
District Council



SOUTH BUCKS
District Council

Stronger in partnership



Buckinghamshire
Thames Valley | LOCAL ENTERPRISE
PARTNERSHIP
THE ENTREPRENEURIAL HEART OF BRITAIN

Examination in Public of the London Plan

January 2019

Joint Statement of the Buckinghamshire District Councils and Buckinghamshire Thames Valley Local Enterprise Partnership (Ref ID: 2890)

Matter 1

Does the Integrated Impact Assessment and Addendum Report (NLP/CD/04 & 05) meet legal and national policy requirements relating to sustainability appraisal and strategic environmental assessment? In particular:

- (a) Is it suitably comprehensive and has it sufficiently evaluated reasonable alternatives and does it provide a basis for future monitoring?
- (b) Have the recommendations within the IIA been adequately addressed within the Plan?

1. This Statement is submitted on behalf of the Buckinghamshire District Councils (Aylesbury Vale District Council, Chiltern District Council, South Bucks District Council and Wycombe District Council), and the Buckinghamshire Thames Valley Local Enterprise Partnership.
2. The London Plan seeks to achieve a step-change in housing delivery in London, including affordable housing, in order to meet as much as possible of the needs of London's growing population within the Capital's boundaries. This supports the Government's objective of significantly boosting the supply of homes by ensuring that a sufficient amount and variety of land can come forward where it is needed (NPPF 2018¹). The London-wide Strategic Housing Market Assessment identifies London's housing need to be 66,000 homes a year (for 20 years). The London Plan makes provision for a supply of 65,000 homes a year for the first 10 years of the Plan, leaving a shortfall of 1,000 homes per year over this period.
3. The London Plan is informed throughout its preparation by a Strategic Environmental Assessment which forms part of the Integrated Impact Assessment (IIA). The relevant legal requirements are for the evaluation of the likely significant effects of implementing the Plan and reasonable alternatives.
4. The Buckinghamshire District Councils and Buckinghamshire Thames Valley LEP do not consider that the London Plan is informed by sufficient evaluation of reasonable

¹ National Planning Policy Framework, Ministry of Housing, Communities and Local Government, July 2018, paragraph 59.

alternatives. In particular the Plan has failed to evaluate a comprehensive review of the Green Belt within London. Given the planned shortfall between housing need and supply in London over the first 10 years of the Plan period and the Plan's acknowledged uncertainty about London's longer-term approach to housing capacity, the Plan is deficient in failing to explore in full what scope there might be to release Green Belt in sustainable locations within London in order to accommodate housing and employment needs.

5. The IIA Consultation Document (November 2017) that accompanied the Draft London Plan includes a number of different strategic options which are compared in terms of their performance against 24 overall objectives relating to the environment, equality and diversity, health and community safety. The preferred strategic options were chosen based on the IIA. 'Making the best use of land' is one of six themes that the IIA identified as being important for London. We agree that this accords with national planning policy and should be a key objective of the London Plan.

6. One of the strategic options to deliver this theme was 'Current London Plan and selective Green Belt release' (IIA Option 4 – paragraph 8.2.3). It would involve a continuation of the objectives in the current London Plan with the addition of limited Green Belt release in sustainable locations to accommodate identified housing and employment needs over the Plan period. Any Green Belt releases would be determined through the local plan process and would prioritise previously developed land and poorly performing Green Belt. The appraisal concludes that the option could/would have a range of positive impacts:

'The sustainable release of Green Belt land can bring a range of local economic benefits, helping to meet local demands and contribute to service and infrastructure provision. The release of land around commuter hubs could help to maximise and enhance strategic public transport infrastructure, underpinning sustainable growth. Green Belt release in sustainable locations and areas of high PTAL could encourage inclusive growth Increased public transport would contribute to improvements in air quality Associated traffic noise would also decline

This option also promotes the delivery of employment and housing land which will benefit businesses and residents alike and could play a role in strengthening the long-term competitiveness of London'.

7. The IIA also considers Green Belt release in terms of environmental impacts, namely species and habitats, flooding, air quality, historic environment and geodiversity. With the exception of geodiversity (effects positive/unknown) and historic environment (effects unknown/minor negative), the significance of the environmental effects is assessed as minor negative/unknown. Minor negative effects are assessed as likely to be limited to small areas within London or limited to small groups of people. This evidence does not appear to support the IIA recommendation '*that an alternative to Green Belt release is considered due to the **severe** environmental damage it could have*' (our emphasis) or the GLA response to this element of the IIA which rejects selective Green Belt release in order to protect the environmental and social benefits (for example, activities that support health and well-being) of the Green Belt. Minor negative effects associated with selective

Green Belt release within London could potentially be avoided or mitigated and this should have been recognised in the IIA.

8. The IIA demonstrates that selective release of Green Belt in London has the potential to deliver sustainable growth. On this basis alone it would constitute 'a reasonable alternative' and should therefore have been given further consideration through the plan-making process as part of the London Plan's preferred 'Sustainable Intensification' option. However, the London Plan is clear that it is seeking to accommodate the majority but not all of London's future growth within its boundary (paragraph 2.3.4). Rejected alternatives such as selective Green Belt release should therefore be re-considered to assess the potential environmental, social and economic impacts of meeting London's housing needs in full within the Capital.