The new London Plan

1. The new, emerging London Plan is the overarching strategic planning document for the capital, and sets out the London Mayor’s development goals up to 2041. Like LBBD’s Local Plan, it must be prepared in line with relevant legislation, government policy and guidance (specifically the National Planning Policy Framework and Planning Practice Guidance).

2. The final version of the new London Plan is expected to be adopted in March 2020, after which time it will replace the current 2016 version. Given that it is at an advanced stage in the plan-making process, however, it is already a significant material consideration for determining planning applications.

3. The GLA is currently reviewing its draft having received the Planning Inspectors report (the Panel Report) providing comments and recommendations on the document following its independent examination earlier this year. The London Mayor is not obliged to address any of the recommendations and the extent of any revisions is currently unknown. We expect the GLA to publish its (potentially revised) version of the new London Plan imminently.

4. This report summarises the direction of travel for key planning policies relevant to LBBD, notes key recommendations from the Panel Report, and speculates on the implications of this for the Borough.

Housing delivery

5. Currently- and controversially- the new London Plan proposes to accommodate 38% of London’s housing growth on small sites, defined as below 0.25ha in size. The Planning Inspectors, however, were not convinced that this was either justified or deliverable, and recommend slashing London’s overall small site housing target by 51%.
6. This has a knock-on effect on overall housing targets, with the Panel Report advocating for a 20% reduction in the London-wide annual housing target, from 66,000 new homes annually, to 52,285.

7. For LBBD, this equates to:
   - Current 10-year housing target of 22,640 (2,264 annually), of which 5,190 are proposed to be delivered on small sites.
   - Panel Report recommends this is reduced to 19,440 (1,944 annually), of which 1,990 are delivered on small sites.

8. The emerging Local Plan is at a stage where specific site allocations are not yet fixed, with detailed assessments underway to evaluate development sites and the proposed housing trajectory. That being said, the trajectory includes several large strategic sites, meaning that a reduction in the GLA’s expectations for housing delivery on small sites could be useful for marrying targets with actual delivery.

**Industrial land**

9. As with the current London Plan, the new version seeks to ensure that the capital has a sufficient supply of land and premises to meet current and future demands for industrial and related functions. Sites are designated into three categories, with policy protections strongest for Strategic Industrial Locations (SIL), slightly less of Locally Significant Industrial Sites (LSIS) and lowest for non-Designated Industrial Sites.

10. All London Boroughs are categorised into one of three categories depending on how the GLA expects that particular Borough to manage its industrial land: provide capacity; retain capacity; and, limited release. LBBD is one of only three boroughs to be identified for limited release, on the basis that its industrial land vacancy rates are currently well above the London average. As a result the Borough is encouraged to intensify industrial floorspace capacity, take positive steps to bring vacant sites back into industrial use where there is demand and support the re-use of surplus industrial land and floorspace for other uses through a proactive plan-led approach.

11. The new London Plan also includes a policy encouraging industrial intensification, co-location and substitution allowing industrial land to be used more intelligently to accommodate both employment (industrial) and residential uses. Simply put, the policy approach is to ensure industrial floorspace is reprovided while putting mechanisms in place to facilitate other uses like residential to also coming forward on industrial sites where this is appropriate.

12. As I would expect, the Panel Report highlights concerns at a London-wide level, around the pressure on industrial land to be redeveloped for other uses, specifically residential. It queries how deliverable some of the policy specifics are, referring to market evidence from industrialists as to how industrial sites operate. For example, the new London Plan currently expects an average of a 65% building footprint on industrial sites, whereas evidence submitted as part of the Plan’s examination indicates a much lower plot ratio for some areas and some uses, including storage and distribution. The Panel Report concludes that demand for industrial land across London may in fact be much higher than is being planned for, proposing that more land needs to be allocated or that remaining industrial land has to be used much more intensively.

13. Like LBBD, the GLA recognises that unlocking the Borough’s extensive industrial land is key to making a substantial contribution towards increasing London’s housing supply, while ensuring
industrial provision meets modern requirements, supporting more and better jobs for local residents. It remains to be seen how the GLA will respond to the Panel Report’s comments on the proposed industrial approach; the Local Plan, however, is seeking to that the Borough’s approach is strategic, and maintains an appropriate supply of employment land and floorspace to generate more and better jobs for local residents while also freeing up underutilised land for alternative uses including residential.

Green Belt

14. While the new London Plan currently decries any development within London’s Green Belt, the Planning Inspectors came to “the inescapable conclusion is that if London’s development needs are to be met in future then a review of the Green Belt should be undertaken to at least establish any potential for sustainable development”.

15. It is however unlikely that the London Mayor will delay publishing a finalised version of the London Plan to allow this review to take place, particularly given that the Planning Inspectors only request a commitment for such a review to be completed to inform the next version of the London Plan.

16. LBBD has very limited Green Belt, meaning that this will have limited impact for the Borough, albeit that we should expect to participate in any such review as part of a co-ordinated approach.

Sustainability and the environment

17. The new London Plan considers greening a fundamental part of site and building design. As part of this, its policies support high quality landscaping, green roofs, green walls and nature-based sustainable drainage.

18. The London Mayor sets a benchmark for calculating the amount of urban greening required for major development, calling this an Urban Greening Factor (UGF). There is general recognition that this needs to be approached flexibly, on a case-by-case basis. This view is echoed in the Panel Report, amid concerns about how deliverable this will prove.

19. There is scope for LBBD to develop its own UGF for the Borough, albeit that any such factor will need to considered within the round having regard to other elements such as affordable housing, carbon off-setting, and Community Infrastructure Levy (CIL) and other planning obligations.

Car and cycle parking

20. The emerging London Plan sets maximum car parking standards and minimum cycle parking standards. These remain largely unchallenged by the Panel Report and we do not expect the standards to be materially altered in any revisions to the new London Plan.

Gypsy and travellers

21. The Panel Report encourages the London Mayor to prioritise a needs assessment of accommodation needs, commenting that there is clearly a significant need for further provision across London.
22. It is unlikely that the London Mayor will delay publishing a finalised version of the London Plan to allow this review to take place. The Local Plan will be drafted to reflect any review / policy alterations to ensure that suitable provision is made within the Borough’s policy framework.

Next steps

23. As noted above, the London Mayor is under no statutory obligation to address or respond to any of the Panel Report recommendations. The next steps are for the Mayor to consider the recommendations before presenting an ‘Intend to Publish’ Plan to the Secretary of State and the London Assembly. This is expected to be published imminently.

24. We do not anticipate there being any further public consultation. Rather, the GLA is under pressure to get the new London Plan adopted ahead of the Mayoral elections in May 2020.