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### **Consultation on the Draft London Plan – TGKP Response**

Thames Gateway Kent Partnership (TGKP) welcomes this opportunity to comment on the Mayor's Draft London Plan.

TGKP is a strategic, public-private partnership promoting sustainable economic-led growth and regeneration in North Kent. The Partnership covers the area of Dartford, Gravesham and Swale borough councils in Kent and Medway Unitary Authority. With effect from 1 April, Maidstone Borough Council will be joining TGKP. The combined Partnership area has a resident population of over 800,000 people, around 315,000 jobs and annual GVA of around £17bn. In the period 2001-2016, this area of North Kent has seen its population increase by over 108,000 people and 45,700 net new homes.

We expect significant growth to continue, estimated at 78,600 new homes and 187,000 more people in the period to 2031. Inevitably, part of that growth involves an element of migration, particularly from London. Part of the rationale for the Thames Gateway is to support London's role, and its growth as a global city. But our vision is for North Kent's growth to be employment-led, with new good quality jobs underpinning the sustainable growth of existing communities as well as potential new settlements, where more people can work closer to where they live. Many North Kent residents travel to work in London and whilst that trend is likely to continue, it is crucial to expand our own economy and avoid becoming simply a dormitory for London.

It is against this backdrop that we broadly welcome the thrust of the Mayor's draft plan to accommodate the major portion of planned growth to 2029 at least within the Greater London boundary. That approach is predicated, however, on a number of assumptions that carry significant delivery risks, which we comment on in more detail below.

Infrastructure has struggled to keep pace with rate of growth in North Kent and continued growth depends upon delivery of additional and upgraded physical and social infrastructure, particularly rail and road capacity and connectivity. We welcome the Mayor's policy support for a proposed extension of the Elizabeth Line eastwards from Abbey Wood to Ebbsfleet. We are working together with GLA, London Borough of Bexley, Transport for London and other partners on developing the strategic outline business case for this Crossrail extension (C2E). The Mayor's policy support will

need to be matched by a funding commitment to deliver this exciting and much-needed infrastructure investment.

TGKP and its counterparts in Essex are working constructively with the GLA on the evolution of the Thames Estuary Production Corridor. It will be important that the London Plan provides a sound policy framework for developing that concept and delivering those ambitions with stakeholders on both sides of the Thames Estuary.

Ongoing engagement with upper and lower tier authorities and other stakeholders across the wider south-east will be essential to ensure that the London Plan fits strategically with the wider ambitions of its neighbours and optimises the opportunities for joined-up and mutually beneficial approaches. We therefore trust that this consultation is merely a milestone in a continuing process of dialogue and collaboration.

The paragraphs below offer our high level comments on specific proposals. We trust that you will give these due consideration alongside the individual submissions made by our partner authorities in North Kent.

Yours faithfully

A handwritten signature in black ink, appearing to read 'MN', is positioned above the printed name of the signatory.

Matthew Norwell

Chief Executive, on behalf of the TGKP Board

## **Comments on specific policies and proposals**

### **Policy SD1 – Opportunity Areas**

We welcome the commitment in paragraph 2.1.8 that “The Mayor will put in place resources and support – such as his Good Growth Fund – to ensure that the potential of London’s growth corridors and Opportunity Areas is maximised”. The draft Plan recognises the Thames Estuary as an important growth corridor, and the importance of new river crossings and other infrastructure investments needed to unlock the potential of areas such as Bexley Riverside. Paragraphs 2.1.42 and 2.1.53 state that the Mayor will also support the Thames Gateway Kent Strategic Corridor by assisting the London Borough of Bexley and adjoining Kent authorities “in seeking a Government-led extension of the Elizabeth Line”. We concur that the extension of the Elizabeth Line should ultimately be a Government-led initiative, but we would like to see a stronger signal of Mayoral financial commitment to secure delivery of this intervention in keeping with the commitment given in paragraph 2.1.8. We also believe that the extension of the Elizabeth Line provides an opportunity for government to pilot new forms of financing for infrastructure (such as land value uplift capture) and we would welcome the Mayor’s endorsement of this approach.

### **Policy SD2 – Collaboration with the Wider South East**

We welcome the presence of a policy on collaboration. The Mayor will need to set out how he proposes to implement the policy for “consistent technical evidence”. Paragraph 2.2.9 highlights that the GLA has created demographic projections for local planning authorities (LPAs) nationally. However, at the present time, the methodology adopted by the GLA for its own projections and those it has made for LPAs nationally does not accord with the methodology and projections of assessed housing need on which Government consulted towards the end of 2017. Unless agreement is reached on an authoritative methodology and projections, one approach or the other is at risk of failing at Examination in Public.

This policy (paragraph E) also mentions “Scope for the substitution of business and industrial capacity where mutual benefits can be achieved”. We note there is a strong commitment in this draft Plan (e.g. Policy E7) to retain an equivalent quantum of industrial floorspace at the same time as better utilisation of sites, for instance through densification and mixed use development. Local authorities across Kent, and in North Kent especially, are finding the supply of sufficient industrial and commercial land particularly challenging. Any policy looking to relocate industrial uses out of the capital to release land for other purposes needs therefore to be treated with extreme care, given the existing pressures on Kent local authorities to identify sufficient industrial and commercial land. In this context, as in others relating to identification of housing sites beyond the capital, the draft Plan refers repeatedly to “mutual advantage”: it will be important to long term collaborations between neighbouring authorities that such deals genuinely are mutually advantageous

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

The GLA’s reliance on its own methodology produces a housing requirement of some 66,000 homes per annum over the next ten years, compared to Government’s projections of 72,000 homes per annum over a longer period. If the latter projections carry the day we would welcome clarification as to how the Mayor would address the shortfall.

There is also a mismatch between the ten years covered by the Mayor's identified housing requirement and the statement in paragraph 1.4.3 that London needs 66,000 new homes per year "for at least 20 years". Neighbouring local authorities working to planning horizons of 2031 and beyond are naturally wondering whether the Mayor's intention that London will largely 'consume its own smoke' in meeting housing need within the GLA boundary will extend beyond those initial 10 years, and how to take this uncertainty into account.

We suggest also that in identifying corridors radiating in and out of London the Mayor should be giving a clear explanation of the relationship his role in helping to deliver infrastructure and his position on the role of growth in the wider South East vis-à-vis the shortfall in housing supply in Greater London over the plan period. The Mayor should not expect, for example, that North Kent could accommodate additional growth from London without the GLA making a major capital contribution towards the Crossrail extension east of Abbey Wood and other necessary infrastructure.

### **Policies H1 and H2 – Housing Supply and Small Sites**

It is clear the draft Plan relies very heavily on much higher delivery than has previously been achieved of new housing on small sites. It is unclear how far London Boroughs are bought into this policy. Even so, there is anticipated to be a shortfall in housing supply in London against need, and the post-2029 London housing supply position is unclear.

The Wider South East has a legitimate interest in ensuring that planned London housing delivery to 2029 is effective and will be delivered. TGKP partners are therefore concerned that the approach of the draft London Plan may be over-prescriptive, particularly in relation to the rigid requirements, targets and specifications on delivery from small sites. We suggest that individual London Boroughs should be allowed local determination to explore the locally appropriate pattern of sustainable development to meet growth targets.

Experience also indicates that the ability to deliver infrastructure, both on-site and local amenities such as school and medical facilities, is greatly reduced in circumstances of cumulative growth from many small sites. Inadequate provision e.g. for schools as a consequence of the small sites approach could increase pressure on provision in boroughs adjoining London already facing their own pressures. With particular reference to the London Borough of Bexley, which borders North Kent, we are concerned that the small sites policy could conflict with that borough's Growth Strategy which, in concentrating on major development schemes in the north of the borough, is a key ingredient in the case for delivering the Elizabeth line extension mentioned elsewhere in the draft London Plan.

### **Policy G3 – Green Belts**

The draft London Plan adopts a robust stance towards protection of London's Green Belt. However, the reality is that the Metropolitan Green Belt extends over much of North Kent as far as Medway and Maidstone, as well as other districts surrounding London. The need for appropriate protection of the metropolitan Green Belt, both within and outside Greater London is recognised by TGKP. However, a London Plan which is rigid and does not allow for flexibility at the local Borough level to provide for sustainable development in the most appropriate way risks an increase of development pressure on the metropolitan Green Belt as a whole.

In this context, there is concern about Policy G2, which provides no flexibility for the de-designation of Green Belt by London Boroughs at the Local Plan-making stage and supports extension of the Green Belt. Reduced flexibility for London Boroughs to explore sustainable growth options if they involve Green Belt land is not welcome given the scale of London's housing requirement, particularly with the potential knock-on implications for the Metropolitan Green Belt outside London if the Capital does not meet its medium and long-term development needs. Such a rigid approach is likely also to make delivery of social infrastructure needed to support housing growth, such as school and health facilities, more challenging for outer London boroughs with significant tranches of Green Belt and exert greater pressure on authorities outside the capital. We therefore suggest that the Mayor should reconsider this policy.

### **Policy E8 – Growth Opportunities and Clusters**

TGKP recognises that the draft Plan complements the Mayor's Economic Development Strategy. There is a number of areas of interest, in terms of overlapping ambitions but differences of scale, between some of the sector clusters identified in paragraph 6.8.3, but we would like to highlight two:

- **Culture and creative industries:** we are engaged in ongoing work with the GLA and other partners on the Thames Estuary Production Corridor. It would be helpful if this paragraph acknowledged that this extends into both the Kent and Essex sides of the Thames Estuary, where there is already strong growth of the creative economy to build on..
- **Life sciences:** this sub-paragraph refers to the MedCity cluster of Academic Health Science Centres and acknowledges the demand for affordable grow-on space for medical and life-science research. Policy E8(F) is cast in relatively open terms in referring to "clusters such as Tech City and MedCity". In that context we would want the Mayor to be aware of the potential and ambitions for a medical and life-sciences focus in part of the North Kent Enterprise Zone (NKEZ) at Ebbsfleet – only 17 minutes from St Pancras and the Crick Institute; and for another of the NKEZ sites, Kent Medical Campus near Maidstone, which aspires to be Kent's first Academic Health and Science Centre. There could be value in the London Plan acknowledging such opportunities, also located in corridors connecting to the Capital which can support London's role as a centre of medical excellence.

### **Policies T1 and T3**

TGKP welcomes the ambitions reflected in policy T1 (Strategic approach to transport) seeking to secure reduced reliance on the private car and modal shift to public transport, walking and cycling. These are ambitions echoed by TGKP partners, for whom modal shift is crucial to the sustainability of anticipated future growth.

TGKP is pleased to see recognition in Policy T3 of the need for significant transport upgrades along the southern side of the Thames from London to Kent. The "priority" given in the policy to new rail provision, including the Elizabeth Line eastwards to Ebbsfleet ("C2E"), is welcome though in keeping with the ambitions of the alliance working on the C2E strategic outline business case we would suggest that the timeframe indicated in table 10.1 should be shortened to 2020-2030 at the latest. The cost categorisation in table 10.1 is not defined, but it is surprising to see the Elizabeth Line extension in the same "high" cost category as, for instance, Crossrail 2 which, even on the basis of preliminary estimates, is likely to be many times the cost of C2E. We suggest it would be helpful for

the final Plan to offer a more nuanced analysis (by which time more precise estimates of the cost of C2E should be known). As noted above in commenting on policy SD3, the final Plan will need to give a satisfactory explanation of the Mayor's role in directly helping deliver infrastructure such as C2E.

We would be more than happy to have detailed conversations with officers at the GLA as they develop the final Plan.