

Cabinet Meeting		Agenda Item. 10
Meeting Date	7 March 2018	
Report Title	Draft London Plan: Consultation by Mayor of London	
Cabinet Member	Cllr Gerry Lewin Cabinet Member for Planning	
SMT Lead	Emma Wiggins	
Head of Service	James Freeman	
Lead Officer	Gill Harris	
Key Decision	No	
Classification	Open	
Recommendations	<ol style="list-style-type: none"> 1. Members note the content of the draft London Plan; 2. The Mayor of London be thanked for the invitation to comment on the draft London Plan 3. The detailed matters at Appendix I to this item be noted and endorsed as the Council's detailed responses to key policies in the draft London Plan, which have been sent to the Mayor to meet the consultation deadline of 2 March. 	

1 Purpose of Report and Executive Summary

- 1.1 This report outlines the key contents of 'The London Plan: The Spatial Development Strategy for Greater London - Draft for Public Consultation December 2017' and proposes a response to the Mayor's consultation on this. The plan covers a wide range of issues from high level strategic policy issues affecting the Wider South East (WSE) including infrastructure; the approach to setting housing targets and how they will be met, to very detailed design and standard setting to guide production of the London Borough's Local Plans.
- 1.2 The report and response suggested from Swale focuses on the strategic issues (including the housing targets) and how these might impact on districts outside London going forwards and potential implications for our own Local Plan process. Members may also be interested to note that a joint response to the Mayor has also been prepared from Kent Leaders and the South East England Councils group. These raise similar issues and strong concerns to those raised in this report, specifically around the impact of potential London overspill on Kent services, facilities, transport networks and the funding challenges for providing appropriate supporting infrastructure .
- 1.3 The consultation closes on 2 March, so a Swale response, with a covering letter from the Leader of the Council has been sent to ensure the deadline is achieved,

with endorsement of that response to be confirmed through agreement of the recommendations of this Cabinet item.

2 Background

- 2.1 The draft London Plan is unique insofar it sets out the overall development strategy for London for 2019 – 2041. The housing targets however are only set for the first ten years and the Plan acknowledges that will need to be a review of housing targets before 2029. The draft Plan also provides a context for the Local Plans to be produced by the London Boroughs and for determining planning applications (for which both the Boroughs and the Mayor are responsible). The Plan is a new plan rather than a review.
- 2.2 The London Plan process is subject to slightly different statutory requirements than those for ordinary district local plans. The Mayor has responsibilities in respect of engagement on the London Plan, but districts have a Duty to Cooperate with the Mayor in producing their local plans. Engagement has taken place during the preparation of this London Plan through ‘summits’ which all local authorities in South East have been invited to (and which Swale has had Member representation at); the South East England Councils group and more regular officer level meetings where progress has been reported through the Kent Planning Officers Group and As a result, this has resulted in draft plan which now has specific reference to the Wider South East; the likely impact of the draft London Plan proposals and the Mayor’s intention to work with partners there. This can be seen as an improvement on previous adopted London Plans and is welcomed, but as this report suggests, it is questionable as to whether key development challenges with impacts beyond London itself have been resolved or at least the means to resolve them have been adequately identified.
- 2.3 The draft London Plan now under consideration is also subject to a more streamlined process than district local plans. Consequently, this is the only stage of public consultation (closing on 2 March 2018) on the full draft of the London Plan before it will be submitted to the Planning Inspectorate for Examination in Public (EIP). The EIP is anticipated in autumn 2018, with invited participants from those responding to this consultation.
- 2.4 The draft London Plan runs to over 500 pages and sets out a range of strategic policies which are likely to affect districts in the WSE; development targets for the next 10 years; environmental policies; and very detailed design policies and design standards for London Boroughs to take up in their local plans. The overall focus is on the theme of ‘Good Growth’ which is about accommodating significantly higher growth targets whilst protecting not only the Metropolitan Green Belt within London from change, but also non green belt ‘metropolitan open land’. This is to be achieved primarily through increasing development densities at all town centres and suburban Boroughs. The Plan also seeks to retain and employment and expand economic functions in a series of 47 Opportunity Areas identified for ‘most significant change’ (para 2.0.3).

Meeting London's Housing Needs

- 2.5 The technical evidence produced by the Mayor in support of the Plan identifies a housing need of 66,000 dwellings per annum (dpa) (paras 2.3.1 and 4.1.1). This is a substantial increase on the 29,000 dpa in the currently adopted London Plan. However this new need figure has been produced by alternative methodology to the standard now being proposed by HCLG for local planning authorities (including the London Boroughs). The HCLG figures set out a need for 72,400 dpa for London.
- 2.6 The Housing Land Availability Assessment for London suggests capacity for 65,000 dpa for the period 2019 – 2029 and this has been adopted as the target for the first ten years of the plan period. Whilst the Mayor's intention to meet the majority of the need within London for this period is to be supported, there are a number of concerns.
- 2.7 On the basis of the Mayor's own evidence, there is at least a 1,000 dpa shortfall in delivery amounting to 10,000 dwellings over the first ten years of the draft Plan, even assuming that the delivery targets can be met. No precise indication is given as to how or where outside London this may be met other than the Mayor's intention to work with 'willing partners' in WSE. No evidence is put forward for the remainder of the plan period to 2041, leaving uncertainty as to how much housing need there is or how it would be met for the period beyond 2029. There is no indication of what happens if delivery targets within London are not being met in the interim.
- 2.8 Should the new HCLG methodology be imposed for this Plan through the Examination in Public, the deficit in London's housing land supply could be as much as 74,000 dpa over the next ten years (approximately equivalent to seven good sized new settlements).
- 2.9 Any planning authority seeking to depart from the HCLG methodology will be expected to robustly justify and evidence its position. Even if the GLA based 66,000dpa assessment of need is accepted, this is likely to put London on a different statistical basis to other planning authorities within the WSE and is likely to create ambiguity and weakness for WSE authorities in preparing their own local plans and demonstrating that account has been taken of outmigration from London in their own needs assessments.
- 2.10 As a minimum, there appears to be a need for a robust mechanism within the London Plan as to how the basic 1,000 dpa shortfall is to be addressed; and if the delivery targets identified are not being met, what actions would be taken to ensure that any unmet need is met outside London. How would it be ensured that there is appropriate infrastructure in place to support them? After the London Plan is adopted, how would such scenarios would play out in practice through the Duty to Cooperate with the Mayor, given that the Duty is incumbent on districts engaged in local plan preparation?

- 2.11 The scale of development implied by the new targets is a massive step change for London, but on top of the increased HCLG targets for all districts, it also raises serious questions about the capacity and ability of the building industry to actually deliver such targets across the WSE, year in, year out.
- 2.12 Policy H2 also sets out an intention for small sites (up to 0.25 hectares / 25 dwellings) to make a key contribution and sets out small site targets for the London Boroughs to address through their Local Plans. The focus on small sites to meet substantial portion of the housing targets is supportable in principle, but it is questionable as to whether these sites will provide comprehensive infrastructure to support housing growth; and is perhaps too prescriptive to actually set targets for them to be observed by the London Boroughs. Issues with under – delivery of housing or provision of appropriate infrastructure support could lead to further pressure on districts in WSE beyond London, where capacity is already overstretched in terms of both infrastructure and development land.

Meeting London's Affordable Housing Needs

- 2.13 Policy H5 page 180 is the main policy dealing with affordable housing for London and is seeking 50% of all new housing as affordable. Provision is sought on site, but off site provision or commuted sums are allowed for in 'exceptional circumstances. There are concerns if London does not achieve its overall housing targets; or achieve the affordable targets within those market sites which are delivered, there could be repercussions for districts outside London. If land in Swale is utilised for London affordable housing provision, this could reduce local development opportunities and thus the provision of affordable homes to Swale residents. Swale already has problems with homelessness in Kent and pockets of deprivation. With the London policy requirement (H5) to provide 50% of new build as affordable, failure to provide it within London, could have potential impacts on public services, including the Housing Options Team.
- 2.14 There is currently limited cross boundary partnership working with London authorities and we would be concerned about the impact on already overstretched public services including health, education and social services.
- 2.15 The draft London Plan must therefore ensure that the required range and mix of private and affordable housing is delivered within London. London Boroughs should be required to deliver affordable homes within a reasonable vicinity of their area to avoid significant migration into Kent and potential for further overloading of stretched public services.

Collaboration with Wider South East and Strategic Infrastructure Policy

- 2.16 Policy SD2 deals in general with collaboration in the WSE. Working with partners across regions, including London is important to deliver challenging development requirements in the most sustainable way, particularly through new infrastructure provision, so the Mayor's stated intention to work with partners on such

challenges is supportable in principle. However, Policy SD2 also goes onto support joint working with WSE partners based on consistent technical evidence; and supports recognition of long term trends in migration in the development of local plans outside London. The draft London Plan is already predicated on a different methodology on housing needs assessment (para 2.2.9 states that this includes demographic projections for the whole of the UK) which will be at odds with the new HCLG methodology within months. WSE partners will therefore find it impossible to be consistent with both the London Plan and national planning policy and practice guidance in their own local plan evidence bases.

- 2.17 Policy SD2 (C) also states that the Mayor will comment on plans outside London as part of the district's Duty to Cooperate 'insofar as they bear strategically on London'. It is unlikely that any single district local plan could have an overbearing strategic impact on London. This statement does need clarification and confirmation that any comment the Mayor may wish to make on a local plan would be proportionate and not result in plan soundness issues which are potentially beyond the capacity of a district to mitigate. The supporting text appears to leave locally specific cross boundary issues to the Duty to Cooperate between the relevant London Borough and its neighbour(s). These 'locally specific' issues do not appear to be defined and their cumulative effects could potentially be significant in terms of achieving the Mayor's overall strategy and have knock on effects beyond the districts concerned (for eg the displacement of housing need from Green Belt authorities to districts in WSE).
- 2.18 Policy SD3 deals with growth locations in the WSE and beyond. The policy wording and supporting text (paras 2.3.1-2.3.8) seeks joint working with willing partners beyond London to explore if there is potential to accommodate more growth in sustainable locations outside the capital, (whilst reaffirming the aim to meet most of the need within the capital). Para 2.3.5 states '*This partnership work could help deliver more homes, address housing affordability and improve economic opportunities outside London. 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 regions and beyond. Another area of focus could be proposals for new/garden settlements with good links to London.*'
- 2.19 A series of 13 'initial' infrastructure priorities are shown in Fig 2.15 of the plan in a radial pattern around London. Those affecting North Kent and Swale include
- the Thames Estuary Ports (including Sheerness);
 - the Lower Thames Crossing and Thames Gateway Kent;
 - Elizabeth Line Extension and HS1 (London - North Kent – Channel Tunnel).
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- 2.20 No detail is offered on new settlements, although it is indicated that some discussions are under way (not with Swale) and the door is 'open' to others who would wish to negotiate with the Mayor
- 2.21 This general theme is followed through in Policy T3 (Transport capacity, connectivity and safeguarding), with a general commitment to development of effective transport policies and projects in development plans to support the sustainable development of London and WSE. However, no detail is supplied beyond the nominated regional scale schemes in Fig 2.15. The fact remains that districts outside London are struggling to accommodate their own growth targets and ensure that there is adequate supporting infrastructure (as evidenced for example by the Swale Local Plan Implementation and Delivery Schedule 2017 and the draft Kent Growth and Infrastructure Framework 2017. This is not just transport and social infrastructure, but could also extend to the need for major new utilities investment. Few districts will be able to accommodate additional growth from London, without major contributions to necessary infrastructure and this may not necessarily be 'regional' in scale.

Metropolitan Green Belt Policy and Housing

- 2.22 Policy G2 covers the approach to London's Green Belt (which extends out for 15 – 20 miles from the edge of the built up area into West and North Kent districts, but not as far as Swale). The Mayor's policy is that the London side of the Green Belt boundary will not be reviewed to accommodate development London's needs. This is quite prescriptive and does not allow for any flexibility in the London Borough's local plans to meet their development needs. It is inevitable that development pressure will be displaced into adjacent districts. Within Kent, these districts also have Green Belt and as they are facing significant increases in their own development targets, are being forced to undertake Green Belt reviews. Even this may be insufficient to meet needs and displacement of development pressure outwards to non Green Belt authorities such as Swale, Medway and Maidstone may be expected.
- 2.23 This policy is likely to result in land of higher environmental value in districts beyond the Green Belt coming under development pressure (than sites of lesser value within the Green Belt itself) and may also result in more and longer commuting journeys to London. This does not appear to be a particularly sustainable option. It is therefore questionable as to whether there is compliance with the National Planning Policy Framework on reviewing Green Belt boundaries as part of sustainable settlement patterns – evidence of such needs to be provided. Whilst the need for appropriate protection of the Metropolitan Green Belt to avoid coalescence of settlements is recognised, the policy as drafted is too rigid, is likely to lead to unsustainable development patterns and should be objected to.
- 2.24 Policy G3 deals with Metropolitan Open Land. Although this policy concept has been established in previous London plans and includes some land of significant heritage or environmental value, it does effectively elevate it to Green Belt policy

status. The policy is couched in similar prescriptive terms, and raises similar issues for sustainable development patterns across a wider area. Policy G4 deals with local green and open space. Although less prescriptive than Policies G2 and G3, it does start with a statement that precludes any loss of these categories of land and again may result in less sustainable development options with impacts beyond London itself.

- 2.25 In summary, a new London Plan is necessary to deal with the growth challenges facing the capital. Such is London's influence, it will have repercussions for planning throughout the WSE. In particular, failure to ensure provision of sufficient housing and infrastructure; and a rigid approach to Green Belt review is likely to influence local plan preparation in Kent, including Swale. This could be through involvement by the Mayor himself; through Duty to Cooperate with other neighbouring districts; or by developers seeking to take advantage of the situation to realise their development ambitions in districts in the WSE. The degree of connection across London and WSE to tackle these matters is not yet fully resolved in the draft London Plan, with key policies appearing to pull in different directions.

3 Proposals

- 3.1 It is important that the Council responds to the issues raised by the draft London Plan, and at least seeks further clarification on how the Mayor intends to deliver the development targets proposed in the plan and how he intends to work with partners in the WSE in practice. The issues are likely to affect Swale in the near future as the Council progresses its own Local Plan review and is required to demonstrate that the Duty to Cooperate with the Mayor (and indeed other Kent Districts who will also be impacted by the London Plan) has been carried out.
- 3.2 Recommendations are therefore that :
1. Members note the content of the draft London Plan in respect of its potential impact on WSE;
 2. The Mayor of London be thanked for the invitation to comment on the draft London Plan
 3. The detailed matters at Appendix I to this item be noted and endorsed as the Council's detailed responses to key policies in the draft London Plan, which have been sent to the Mayor to meet the consultation deadline of 2 March.

4 Alternative Options

- 4.1 The draft London Plan is raising some important issues which affect the whole of the WSE region, not least as to how the very challenging development targets for all planning authorities within and outside London will be met over the next two or three decades. It is important that Swale voices its concerns on these matters, as

there are still significant areas of uncertainty in the draft London Plan, which could affect Swale’s own planning process in the future.

4.2 Members could opt not to respond to this consultation on the draft London Plan. However, the London Plan is subject to slightly more streamlined statutory process and there will be no other opportunity for comment before this plan is submitted to the Planning Inspectorate for Examination in Public. Whilst (as with all EIPs) there is no guarantee that Swale BC would be invited to attend the EIP hearings, by making representations at this stage, the Council will at least have registered its concerns. These could be supplemented by written representations to the EIP in due course. For these reasons, not responding to the Mayor’s consultation is not recommended.

5 Consultation Undertaken or Proposed

5.1 The London Plan is prepared by the office of the Mayor of London. Swale BC is itself a consultee on this plan and consequently has no responsibilities for consulting others in this instance.

6 Implications

Issue	Implications
Corporate Plan	Potential impact in future on a Borough to Be Proud of through influencing the Swale Local Plan review.
Financial, Resource and Property	None identified at this stage
Legal and Statutory	None identified at this stage
Crime and Disorder	None identified at this stage
Environmental Sustainability	The London Plan and development challenges it entails for London and WSE do raise issues over whether a sustainable development strategy has been proposed and this is dealt with in the body of the report.
Health and Wellbeing	None identified at this stage
Risk Management and Health and Safety	None identified at this stage
Equality and Diversity	None identified at this stage

Privacy and Data Protection	None identified at this stage
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7 Appendices

- 7.1 The following documents are to be published with this report and form part of the report:
- Appendix I: Draft London Plan (December 2017): Swale Borough Council Detailed Response

8 Background Papers

The London Plan – The Spatial Development Strategy for Greater London Draft for Public Consultation (December 2017) can be viewed at:

<https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan?source=vanityurl>

Appendix I

Draft London Plan (December 2017): Swale Borough Council Detailed Response

London Plan para / Policy No.	Swale BC Comment	Notes
Policy GG 2/ para 1.2.1	Conditional Support	<p>The Mayor seeks to accommodate rapid growth of 49,000 jobs per annum and 65,000 dpa (out of a need for 66,000dpa) through creating places of higher density and mixed land uses where local facilities and amenities are within walking distance. Whilst a practical and ambitious approach, we note that this includes intensification of land use in outer London which will be 'pro-actively explored. Given the intention not to review Green Belt and Metropolitan Open Land, we query how effective this will be in delivering the targets. Policy GG4 and Policy H2 also indicates a heavy reliance on small sites, and we question the certainty of delivery from such sites, given the scale of need.</p> <p>As London is also a major focus for commuters, we question whether encouraging job growth on this scale is sustainable in the context of the WSE as it will encourage additional growth in commuting journeys from beyond the Green Belt. Green Belt Review appears a necessary component of this (see comments on Policy G2).</p> <p>Whilst some of these principles can be supported we are unconvinced as to whether it is sustainable or deliverable. The Plan needs to provide further evidence of how these objectives will be delivered.</p>
Policy GG5 /para 1.4.8	Conditional Support	<p>At Para 1.4.8 the Mayor acknowledges the contribution of WSE to the London and UK economy, but the means by which this will be promoted is not spelled out clearly in Policy GG5 (cross referencing other relevant policies may be helpful in this).</p>
Policy SD2 Collaboration in the WSE	Conditional Support	<p>The principle of a policy on collaborative working with WSE partners is to be supported. However, greater clarity is required on how Policy SD2 will be applied in practice.</p> <p>To date there has been no attempt to identify or establish working relationships with districts who could be potential willing partners for growth, or how the Mayor intends to work with WSE partners on regional challenges and shared strategic concerns. The Mayor should explain further how he will</p>

		<p>implement the aim of Policy SD2 Clause B for 'consistent technical evidence'. GLA have already created their own demographic projections (para 2.2.9) and development targets on a different basis to non London authorities. This already creates a conflict with national policy for WSE authorities in progressing their own local plans, as they will not be able to be in accordance with the London Plan and national planning policy. This is not effective and risks unsoundness.</p> <p>To ensure that joint working can progress and remains constructive, more could be said on how the Mayor will respond in terms of the Duty to Cooperate which district local planning authorities are required to observe. Since it is unlikely that any individual local plan in WSE would have a significant impact on delivery of targets and the strategic planning of London, we would expect that the Mayor's comments on any such local plan would be proportionate and appropriate.</p>
<p>Policy SD3 Growth Locations in WSE and Beyond Fig 2.15</p>	<p>Conditional Support</p>	<p>Para 2.3.4 -5 references the need to work with willing partners outside London to explore the potential for accommodating growth in more sustainable locations outside the GLA area. Recognition of joint working and exploration potential mutual benefits can be supported.</p> <p>However, the focus is on locations which are or could be well connected by public transport and / or proposals for new settlements. Figure 2.15 focuses on 'initial' radial transport infrastructure corridors for improvement.</p> <p>Further detail needs to be written into the plan on how this could operate, as Swale, in common with many other districts are struggling to accommodate their own growth targets and ensure that there is adequate supporting infrastructure (as evidenced for example by the Swale Local Plan Implementation and Delivery Schedule 2017 and the draft Kent Growth and Infrastructure Framework 2017. Few districts will be able to accommodate additional growth from London, without major contributions to necessary infrastructure. Some of this may not necessarily be of a regional scale of importance, but is none the less vital, and all the more difficult to achieve in areas where viability is much more challenging than London.</p>
<p>Policy H1 Increasing</p>	<p>Object</p>	<p>Para 1.4.4 notes that ten-year housing targets have been developed for all London Boroughs and are to</p>

<p>Housing Supply/ Table 4.1 (also para1.4.4) Increasing Housing Supply</p>		<p>be used as the basis for their development plan documents and are not required to take note of nationally derived local need figures. No explanation is given for this and immediately creates a discrepancy in the evidence base between London and WSE for gauging housing need and targets in development plans. Para 4.1.7 states that the targets are based on a pan-London Strategic Housing Land Availability Assessment, rather than the Strategic Housing Market Assessment including demographic change specified at para159 of the NPPF. This will no doubt be exploited by developers, to the detriment of authorities preparing local plans both within and outside London.</p> <p>The housing target of 66,000dpa is only identified for the first ten years of the plan period (to 2029). There is no indication of what the target may be beyond this date or how and where they would be met for the remainder of the Plan period to 2041. Local planning authorities will be looking beyond 2029 in their own local plans (Swale's currently adopted plan already goes to 2031).</p> <p>During the preparation of the London Plan, the Mayor's officers have briefed WSE authorities that there was likely to be a significant shortfall in housing land supply within London against identified need. Whilst the shortfall appears to have been held at 1000 dwellings per annum, this is on a much larger housing target than in the adopted London Plan. The identified shortfall of 1000 dpa, still amounts to 10,000 dwellings over the lifespan of this target. The shortfall is likely to be even larger if London planning authorities are required to take on board the new HCLG methodology for calculating need. For London this is 72,000dpa. This would imply a very significant shortfall in the provision of this plan and begs the question of where, when and how this may be expected to be addressed.</p> <p>We therefore question the overall deliverability of even the proposed target, especially when coupled with the rigid approach to Green Belt and open space policies and the specifications for delivery from small sites. A less prescriptive approach may enable the London Boroughs to seek more pragmatic and sustainable solutions.</p> <p>The uncertainty around the veracity of the target itself and London's ability to deliver it could have a knock on effect to WSE authorities who are struggling to</p>
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		<p>meet extremely challenging adopted (and likely prescribed HCLG targets of their own), not least in terms of potential for disruption of the plan making process and their ability to deal with plan led development and infrastructure.</p>
<p>Policy H5 Affordable Housing</p>	<p>Conditional Support</p>	<p>There are concerns if London does not achieve its overall housing targets; or achieve the affordable targets within those market sites which are delivered, there could be repercussions for districts outside London. If land in Swale is utilised for London affordable housing provision, this could reduce local development opportunities and thus the provision of affordable homes to Swale residents. Swale has problems of homelessness and with pockets of deprivation. With the London policy requirement (H5) to provide 50% of new build as affordable, failure to provide it within London could have potential impacts on public services, including the Housing Options Team. There is currently limited cross boundary partnership working with London authorities and we would be concerned about the impact on already overstretched public services including health, education and social services.</p> <p>The London Plan must therefore ensure that the required range and mix of private and affordable housing is delivered within London. London Boroughs should be required to deliver affordable homes within a reasonable vicinity of their area to avoid significant migration into Kent and potential for further overloading of stretched public services.</p>
<p>Policy G2 London's Green Belt</p>	<p>Object</p>	<p>The need for appropriate protection of the Metropolitan Green Belt is recognised. However, a London plan which is rigid and does not allow for flexibility at the level of London Borough plan making, risks an increase in pressure elsewhere, especially the non- London Green Belt authorities. The latter are facing GB reviews in their own local plans to accommodate massive increases in development targets.</p> <p>This could well result in the release of land with higher landscape or biodiversity value than some of the degraded sites the Mayor notes to be retained. Rigid retention of all London MGB land is also likely to have the effect of displacing development pressure to districts beyond the MGB, where again land of significant environmental value recognised in Local Plan policy is already coming under pressure.</p>

		<p>We would query whether this is the most sustainable option in environmental terms across London and WSE.</p> <p>Retention of all London MGB and displacement of housing development pressure to WSE is also likely to increase the number of commuters facing longer journeys into London which is unsustainable in itself and places more pressure on already overburdened transport systems.</p> <p>We consider that a less prescriptive approach enabling the London Borough's to review MGB where appropriate, would be more realistic and ease this pressure.</p> <p>We would also question whether the Mayor's approach on this matter responds effectively to para.84 in the NPPF which states:</p> <p><i>84. When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.</i></p> <p>We should expect to see evidence from the Mayor's office on this matter.</p>
Policy G3 Metropolitan Open Land	Object	<p>Whilst we note that the concept of Metropolitan Open Land has been established in previous London plans and some of it has significant environmental and or heritage value, we would query what basis there is to afford it similar policy protection as MGB.</p> <p>All of the issues raised for Policy G2 apply with such a prescriptive approach.</p>
Policy G4 Local Green and Open Space	Object	<p>Whilst not quite as prescriptive at Policy G3, we query whether it is internally consistent, with Clause A appearing to preclude any loss, whilst the rest of the policy does imply that it could be considered. If Clause A prevails, then all of the points made in respect of Policy G2 and G3 apply.</p>
Policy T3 Transport Capacity,	Conditional Support	<p>The principles of this policy are supportable.</p> <p>However, no detail is supplied beyond the nominated regional scale schemes in Fig 2.15. The fact remains</p>

Connectivity and Safeguarding		that districts outside London are struggling to accommodate their own growth targets and ensure that there is adequate supporting infrastructure (as evidenced for example by the Swale Local Plan Implementation and Delivery Schedule 2017 and the draft Kent Growth and Infrastructure Framework 2017. Few districts will be able to accommodate additional growth from London, without major contributions to necessary infrastructure.
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