Town and Country Planning Association
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Draft New London Plan EiP
Wider South East and beyond (Policies SD2 and SD3)

TCPA written response

About the TCPA

Founded in 1899, the Town and Country Planning Association (TCPA) is the UK's oldest independent charity focused on planning and housing. The TCPA puts social justice and the environment at the heart of policy debate and seeks to inspire Government, industry and campaigners to take a fresh perspective on major issues, including planning policy, housing, regeneration and climate change. Our objectives are to:

- Secure a decent, well designed home for everyone, in a human-scale environment combining the best features of town and country;
- Empower people and communities to influence decisions that affect them;
- Improve the planning system in accordance with the principles of sustainable development

Summary of TCPA response

The TCPA welcomes the draft Plan's recognition that London is part of an extensive and complex network of centres across the wider South East (WSE). Policy SD2's commitment to work proactively with partners across the WSE and Policy SD3's commitment to consider the role of new/garden settlements outside London are also welcomed.

However, the TCPA continues to emphasise the challenge of attempting to meet London's housing needs entirely within its own boundary in a sustainable, resilient and socially-just way. The Plan misses the opportunity to properly consider and coordinate with neighbouring local authorities (councils who are neighbours to the London boroughs, but beyond the Greater London boundary) and those in the WSE to meet the housing needs of London. This includes the strategic consideration of the delivery of a series of new or expanded settlements beyond the Green Belt in the WSE and beyond, alongside significant public-sector investment in housing and regeneration of our existing communities, including the existing post-war New Towns in the South East. The TCPA also encourages the Mayor to consider delivery models including modernised New Town Development Corporations that commit to the Garden City Principles[1].

Responses to matters M15

(a) How, if at all, should the Plan address the matter of development and growth in the wider South East?

[1] https://www.tcpa.org.uk/garden-city-principles

The Plan should address the matter of development and growth in the wider South East, in recognition of London's impact on this area, but also as an important opportunity to secure a strategic approach to sustainable growth in the WSE and beyond.

Collaboration with authorities in the WSE on strategic concerns and realising growth potential as set out in Policies SD2 and SD3 is welcomed. However, the emphasis on infrastructure investment for growth locations does not go far enough. The TCPA recommends that this collaboration could also be used to help London accommodate some of its own growth needs in the WSE and beyond. There are significant opportunities for the Mayor to work with authorities in the WSE on a strategic and evidence-based approach to identifying the need and locations for new and renewed communities in the WSE.

The TCPA has advocated this level of sub-national strategic planning for new communities as part of a strategic national approach to identifying the need and locations for new Garden Cities, including as a means to meet the Government's commitment to develop 5 new 'Garden Towns'. The TCPA recommends a national spatial plan identifying areas of search, and within these areas local authorities working in partnership to identify scale, locations and patterns of growth[2]. The first wave of New Towns delivered through the post-war New Towns programme resulted from a similarly strategic approach to accommodating London's growth needs, with locations identified in the London Plan. Today the context is different, and need and locations should be part of a local-authority led and evidence led approach, but the need for a strong relationship between the London Plan and growth considerations in the WSE remains and should be strengthened in the Plan. The TCPA has written extensively on the lessons from the New Towns programme and how these might inform current policy approaches to growth[3].

Drawing on this, the Plan should also consider the role of delivery vehicles such as modernised New Town Development Corporations which commit to high placemaking objectives such as the Garden City Principles. The role of such Corporations in speeding up built-out rates was recognised in the recent Independent Review of Build Our Rates[4] and in 2018 Government adopted new Regulations for local-led New Town Development Corporations. These have a role for new communities but also in the renewal of existing places. They are different to those Mayoral Development Corporations which are delivering strategic development sites in London. The role of London in rebalancing the nation's economy was recognised in the recent Raynsford Review of Planning[5] and is the subject of the UK2070 commission being led by Lord Kerslake[6].

(b) Are policies SD2 and SD3 necessary, and would they be effective in assisting in implementation of the Plan and/or informing a future review of the Plan?

Policies SD2 and SD3 provide essential consideration of collaboration and the role of the London Plan in considering growth needs in the WSE. However, the TCPA recommends that Policy SD2 is strengthened by including in SD2(E) a reference to the consideration of the role of new or expanded settlements as part of a strategic approach to meeting growth needs across the WSE and beyond. The TCPA also recommends that Policy SD3 is amended to include consideration of the role of new and expanded settlements in the WSE and one of a portfolio of options to accommodate some of London's own housing needs. The TCPA recommends that Mayor includes consideration of the opportunity to develop major new settlements, including sustainable urban extensions and Garden

[2] https://www.tcpa.org.uk/guide-1-locating-and-consenting-new-garden-cities
[3] https://www.tcpa.org.uk/research-gcnt
[4] https://www.gov.uk/government/collections/independent-review-of-build-out
[5] https://www.tcpa.org.uk/raynsford-review
[6] http://uk2070.org.uk/

Cities, jointly with local planning authorities around London as part of the wider assessment of capacity outside London. This should be reflected in policies SD2 and SD3 alongside reference to the opportunities around securing the right delivery model, including modernised New Town Development Corporations that commit to the Garden City Principles. One of the advantages of the New Town development corporation approach is that it allows for diversity in the commissioning of new housing from traditional suppliers to self-build. This effectively allows for a test bed for the establishment and growth of new and small housing providers and for the development of new construction techniques, helping deliver many of the other policy objectives in the Plan. Development Corporations backed by the right legal and policy objectives have a positive incentive to maximise build out rates and the powers to resolve delivery issues. This is not simply to deliver strategic new large-scale development, but equally as relevant and applicable to inner area regeneration. The TCPA encourages the Mayor to consider the accommodation of the growth of London in the wider South East, beyond the Green Belt. This needs to be as part of a vision for the wider South East, in terms of the infrastructure required to support sustainable growth in London and the region.

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