

Outer London Commission.

**Your Ref:**

**Our Ref:** GDSPG/Sep/2015

**If telephoning please ask for:** Jack Straw

**Direct Line:** 01306 879246

**Fax:** 01306 879180

**Email:** jack.straw@molevalley.gov.uk

11<sup>th</sup> September 2015.

Dear Sirs,

**Outer London Commission Questions to Inform the Full Review of the London Plan**

I am responding to the Commission's "Questions to Inform the Full Review of the London Plan and the Options for Growth" on behalf of the Gatwick Diamond Strategic Project Group which comprises the Planning Policy Managers of the Gatwick Diamond local authorities which are listed at the foot of this letter.

The Gatwick Diamond local authorities have a history of close cooperation on strategic planning and development issues. We link closely to, and on key economic issues, form part of the Gatwick Diamond Initiative, one of the five spatial partnerships which make up the Coast to Capital Local Enterprise Partnership. We have an agreed Memorandum of Understanding setting out how we work together on issues which cross local authority boundaries and a Local Strategic Statement (2012). We are looking to update this and intend to liaise closely with areas outside the Gatwick Diamond, including London, as part of the review process.

In the Gatwick Diamond Local Authorities' response to the London Infrastructure Plan 2050 (see accompanying letter dated 29 October 2014) we acknowledged that infrastructure to support the projected scale of economic and population growth to 2050 is a key issue for London and that a coordinated infrastructure plan is highly desirable. However, we noted that the Plan explored a number of scenarios about where growth can be accommodated within London and beyond London's boundaries 'as a precursor to the next full revision of the London Plan after 2016'. Indicative maps in the Plan and supporting documentation highlighted the Gatwick area as a potential growth area in the context of accommodating some of London's forecast increase in population. We took great exception to this and were firmly of the view that it was not the place for a non-statutory plan to start to determine a spatial strategy for London and the South East or to seek to influence the Local Plans of authorities outside London.

Instead, we recommended that spatial options to accommodate London's future growth should be tested through the next review of the London Plan. We therefore felt it is vital that the Mayor engages with local authorities or groups of authorities from across the South East, sharing evidence and understanding of opportunities and constraints, in order to agree on how to address the challenges facing the area as a whole.

We also suggest that the time is right for other, more innovative responses to future growth to be considered. We believe that spatial options that seek to locate the majority of London's future housing growth beyond its boundary, within the South East, are not only unsustainable but may also prove unviable in terms of the infrastructure necessary to support them. Whilst redistribution of that housing growth to other, more distant parts of the country may not be possible within the short/ medium term, such options should be considered now. The Government's Northern Powerhouse and City Devolution Initiatives may provide a framework for exploring such options further. It would be disappointing for this opportunity to be passed-up.

In view of the impact of London's growth on the Gatwick Diamond area, you will appreciate from these comments that we welcome the opportunity to be engaged in the early stages of the Full Review of the London Plan and would like to make the following comments in relation to a number of the questions posed in the consultation.

**QG4: In the Context of meeting London's growth, what contribution should the following mechanisms make to helping to meet the challenge of delivering increased levels of housing?**

- **Increasing outer London densities, particularly through suburban renewal**
- **More housing at higher densities in town centres and Opportunity Areas/ Intensification Areas with good public transport**
- **Greater cumulative contribution of small scale sites, such as infill**
- **Selective release of London's greenbelt around public transport nodes for housing (or consolidation of employment)**
- **Densification of built up areas beyond London (new towns; garden cities, suburban extensions).**

The first four of these suggestions for meeting housing growth are supported. In accordance with paragraph 47 of the NPPF, the London Plan should seek to meet the needs of the Capital as well as boosting the supply of housing.

Only if these measures cannot meet the needs of London should the last option of densifying built up areas beyond London be considered. While areas beyond London have historically supported the London economy by providing homes for its workforce, they are facing intense pressures to meet their own housing and other development needs. The road and rail network in the Gatwick Diamond area has capacity issues, so increasing commuting has infrastructure complications and will require significant investment.

We would reiterate our comment above that any long term reliance upon the greater South East meeting London's housing needs is misplaced. It assumes a concentric growth pattern that is no longer sustainable or viable. More innovative options that look to redistribute growth beyond the South East must be considered. We believe that the time is right to explore such options – particularly in relation to meeting the Government's objectives for strategic public transport infrastructure and the Northern Powerhouse and City Devolution Initiatives.

**QG6: Would it be worth considering growth 'corridors' (e.g. as with LSCC and linked to existing /potential public transport) in terms of enabling an integrated housing/employment/ cross-boundary strategy... and if so, which corridors could be a focus (e.g. associated with CR2, HS1, HS2, CR1 extensions, C2C improvement, Gatwick)?**

As indicated in the Gatwick Diamond representation on the London Infrastructure Plan, London should first look to accommodate its growth within its boundaries. Where necessary, this may dictate a review of existing Metropolitan Open Land and Metropolitan Green Belt designations. As we have previously indicated in our response on the Further Alterations to the London Plan, areas to the south of London do not provide unconstrained opportunities for meeting London's growth, as evidenced by the very significant challenges faced by the local authorities in meeting their own objectively assessed housing needs.

The Gatwick Diamond is an important economic area in its own right. Gatwick airport is of national significance and has its own associated growth needs. Local authorities in the Gatwick Diamond area are seeking to meet all the needs of the area so far as possible within planning policy, environmental designations and infrastructure constraints. District and boroughs' Local Plans should not be compromised by having to accommodate additional growth from London. Of the 25 local planning authorities in Surrey, East and West Sussex, only two are planning to meet their needs: Horsham and Mid Sussex. Horsham District is also planning to assist in meeting the needs of the wider area. Of an estimated objectively assessed need of 16,000 homes per year for the three counties, current proposed provision figures amount to 8,427 per year, or just over 50% of the need.

This is due to the amount of constraints, including the Metropolitan Green Belt (73% of Surrey), Areas of Outstanding Natural Beauty and the South Downs National Park and the high level of 'need' because the population projections assume that the high level of in-migration to the South East will continue indefinitely. There are also significant environmental, social and infrastructure constraints in areas outside these national designations, where housing is being targeted. The existing infrastructure deficit cannot be addressed through contributions from development alone, generating a greater burden on these areas.

Since the London Infrastructure Plan was published, the Airports Commission has ruled out as a viable option a hub airport in the Thames Estuary to increase airport capacity in the South East to 2030. The review of the London Plan needs to consider the consequences for infrastructure in the



event that Heathrow Airport or Gatwick Airport is selected for expansion, as well as addressing the infrastructure needs of their already planned growth.

**QG7: How can we maximise the benefits of growth regionally, sub-regionally and locally; and mitigate concerns? (e.g. provision of supporting social and community infrastructure; greater focus on place-making; re-provision in the new development of social housing)**

The wider South East will continue to provide homes for significant numbers of London commuters requiring local services and so a proportion of infrastructure requirements such as education and health will fall on areas outside London.

Infrastructure and its funding should be planned in a wider context. Working with local authorities in the South East, the Mayor should consider how strategic connectivity within the wider area could support economic success and offer mutual benefits as part of its infrastructure package.

The review of the London Plan should consider how strategic transportation links should be improved as part of a long term infrastructure plan in the event that Heathrow or Gatwick is selected for expansion. Gatwick Airport anticipates a growth of up to 45 million passengers per annum by 2030 even without a second runway. Ensuring that 40% of these passengers arrive at the airport by sustainable transport, in line with the current target, will require maintaining and enhancing an adequate network, particularly rail, from London.

The review of the London Plan should look to address wider transport connectivity within the South East, given the importance that this will have in securing collective economic success and, for the long term, successful places in which to live and work.

**QR1: Should London and the wider south east be viewed as one area for managing growth? What are the planning implications of this for housing and jobs growth and strategic infrastructure provision?**

Given the scale of growth, the review of the London Plan needs to be supported by appropriate evidence which addresses the wider infrastructure needs of London and its hinterland and that reflects the interrelationship between London and the South East and their collective economic success.

**QR4: How could useful co-operative relationships be built (over time) across the border and going beyond the statutory requirements under which the Mayor and LPAs work? How can any value be added to this process?**

There are limited resources available in local authorities for strategic engagement work with the Mayor/GLA. Use should be made of existing umbrella organisations such as SEEC and their relationships with the GLA rather than the creation of a new organisation/secretariat. Some

officer support is already in place through the Strategic Spatial Planning Officer Liaison Group and this could be developed further.

**QR8: Who could constitute the membership? How many local authority representatives, how many LEP representatives and others should be directly involved?**

The representation by local authorities could be based on a housing market area or economic areas, with one representative per area. County Councils as key infrastructure providers also need to be represented. The Gatwick Diamond, as explained above, is a collective voice that would be willing to contribute. Individual representation by each local authority in the South East would be impossible to manage.

**QR9: What should be the format of new co-ordination arrangements, and how many layers should it have?**

It is requested that any arrangements that are set up in relation to Regional Coordination for London and the South East are mindful of the existing structures and bodies already set up beyond the Greater London boundary, including the Gatwick Diamond Local Authorities. This would help reduce duplication and maximise the limited resources available.

Any new relationships and arrangements should be expected to consider wider issues relating to infrastructure delivery where they affect areas beyond London's administrative boundaries.

I hope these comments are helpful. We would welcome the opportunity to work more closely with the GLA both in the context of the proposed full revision of the London Plan and any future iterations of the London Infrastructure Plan.

Yours faithfully,

A handwritten signature in black ink, appearing to be 'J. Straw', with a long, wavy horizontal line extending from the end.

**Jack Straw**

Planning Policy Manager, Mole Valley DC

On behalf of the Gatwick Diamond Strategic Project Group.

\*The Gatwick Diamond Local Authorities comprise: West Sussex County Council, Surrey County Council, Crawley Borough Council, Epsom and Ewell Borough Council. Horsham District Council, Mid Sussex District Council, Mole Valley District Council, Reigate & Banstead Borough Council and Tandridge District Council. With the exception of Epsom and Ewell Borough Council, which joined later, all the Authorities work within the terms of a Memorandum of Understanding agreed in

2012. The Local Strategic Statement was endorsed by all the Councils in 2012 with the exception of Tandridge District Council and Epsom and Ewell Borough Council.