



**Horsham
District
Council**

Boris Johnson, Mayor of London
(London Infrastructure Plan 2050)
GLA City Hall,
The Queen's Walk,
London SE1 2AA

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Date: 29 October 2014

Dear Mr Johnson

London Infrastructure Plan 2050 – July 2014

I am writing on behalf of the Gatwick Diamond Local Authorities* in response to your consultation on the London Infrastructure Plan 2050.

By way of introduction, you may wish to note that the Gatwick Diamond Local Authorities have a history of 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, finalised in early 2012, which we are looking to update. We intend to liaise closely with areas outside the Gatwick Diamond, including London, as we look to review the Local Strategic Statement.

We acknowledge 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 note that the Plan explores 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 highlight the Gatwick area as a potential growth area in the context of accommodating some of London's forecast increase in population. We believe that it is not the place for this 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. Gatwick Airport is of national significance and the Gatwick Diamond is an important economic area in its own right with associated growth needs. Local authorities in the area are planning to meet these needs and this should not be compromised by growth from London.

Spatial options to accommodate London's future growth should be tested through the next review of the London Plan, expected to be complete by 2019/20, which will require the Mayor to engage 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.

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 document and supporting background evidence is therefore out of date and any future version of the 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.

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We would also like to make the following comments in relation to a number of the questions posed in the consultation.

Q: Do you agree with the need for an infrastructure plan for the capital? Do you support our approach? If not, why?

Given the scale of growth and the nature of the infrastructure needs, a coordinated plan supported by appropriate evidence would seem to be highly desirable. However, such a long term infrastructure plan needs to reflect the interrelationship between London and the South East and their collective economic success and support this through strategic infrastructure provision for this wider area.

Q: Is any of the infrastructure identified unnecessary – if so why? What (if any) infrastructure do you think London will need in addition to what we have identified? Why?

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 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 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.

Q: Will the London Infrastructure Delivery Board be enough to ensure best-practice joined-up delivery of infrastructure in London? What more could the Mayor do?

Any London Infrastructure Delivery Board should be expected to consider wider issues relating to infrastructure delivery where they affect areas beyond London's administrative boundaries with those areas.

Q: Where do you think London's growth would be best accommodated (please explain why)? Are there alternative spatial scenarios we need to analyse?

As indicated in the 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 challenges faced by the local authorities in meeting their own objectively assessed housing needs, and may even need to plan for growth to support a future expansion of Gatwick Airport.

That said, the issue of London's growth is not one which should be set to one side. However, it is not the place for this non-statutory Infrastructure Plan to start to determine a spatial strategy for London and the South East or seek to influence a local authority's strategy for the planning and development of its area. Spatial options to accommodate London's future growth should be tested through the next review of the London Plan. This will require the Mayor to engage with local authorities from across the South East in order to understand and agree on how to address the challenges facing the area as a whole.

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Q: Transport - Are there any other strategic projects we have not considered?

The plan should look to address wider 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.

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

Yours sincerely,

A handwritten signature in black ink, reading "Tom Crowley" with a stylized flourish at the end.

Tom Crowley
Chief Executive, Horsham District Council
On behalf of the Gatwick Diamond Local Authorities

* 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, finalised in early 2012, was endorsed by all the Councils with the exception of Tandridge District Council and Epsom and Ewell Borough Council.