### **TOUTER LONDON COMMISSION**

# **NEW APPROACHES TO/ISSUES FOR REGIONAL COORDINATION**

This is a personal response to your request for views as set out in the above paper dated June 2015. It derives from my personal professional practice as a strategic regional planner dealing with relationships between London and the wider region over 45 years, including acting as the lead London officer on the previous interregional body SERPLAN from 1989 to 2000. I have summarised the later activities of SERPLAN and its relevance as I see it to today's situation in an article published in the January 2015 issue of 'Town & Country Planning'\*.

Rather that respond to your 12 questions, I give below my overall views on the situation under three headings: focus, issues and geography, with some final points on the way forward.

#### **Focus**

It seems to me, reading the papers produced this spring (I have not been party to the current meetings), that the focus of the discussion to date has been on process – on how new arrangements could be established in terms of options for engagement structures – rather than on the issues and challenges that new arrangements will need to address to be effective. The emphasis seems to be on formulating and testing engagement options and then how they might be implemented. To me this is putting the cart before the horse – a case of form before function. I urge that between now and the December event, this issues and challenges should be set up for discussion, so that new cooperation arrangements may be seen as fit for purpose. This would enable the December session, as a further stage in an ongoing process, to relate the issues and challenges to engagement options. Proper consideration can then be given to joint arrangements which would be fit for purpose.

### **Issues and Challenges**

The prime issue – from the London viewpoint the catalyst for new regional arrangements – is the extent to which the wider south-east will need to accommodate a proportion of the requirement for new housing generated by London in the medium to long term. This was discussed at the 2014 Public Examination into the FALP, where bodies outside London raised serious concern at the Mayor indicating that there plans will need to allow for this, concerns that were remitted to the present situation. The Mayor sought to reassure the wider region that London can accommodate its housing needs up to 2025; some bodies have been sceptical about this, It is therefore incumbent on the Mayor to indicate how he

will define the scale of this issue, based on analysis being undertaken for the new replacement London Plan, where this will be closely scrutinised. There are merits in approaching the matter on a scenario basis, considering the way alternative demographic projections would generate different housing requirements.

#### Other issues include:-

- Comparative economic growth, development and regeneration, based on the latest data on structural change and employment projections, together with the relationship between prospects particularly in outer London and those in the wider region – a matter which the OLC has concerned itself with previously.
- Infrastructure capacities and investment needs. In London much strategic work has been done. In the wider region, there is much concern that transport (rail and road) is increasingly at capacity over wide areas; capacity issues also arise regarding water and other infrastructure. Investment plans to create more capacity suffer public expenditure limitations. How this situation could constrain future housing and related development requires considerable analysis, e.g. by putting together County and LEP scale assessments and updating on the position set out in the revoked South East and East of England regional plans.
- Environment: protected areas (AONB etc.) are well documented; together with good quality agricultural land and areas liable to tidal and river flooding, extensive parts of the wider south-east would not be available as future development options.
- Green Belt: there are recent suggestions that the long-established Metropolitan Green Belt might be relaxed along transport corridors.
  Widespread political opposition is apparent to any general relaxation, at government, mayoral and local levels, except where justified in the local plan context. Any changes to green belt boundaries would need to respect the clear purposes of defined green belt set out in paragraph 80 of the NPPF.

### **Regional Geography**

There should be a clear geographical/spatial dimension to establishing effective new inter-regional arrangements. As in the different parts of outer London – east, west, north, south – situations vary widely outside London. This is particularly the case between the economically buoyant western corridors (including Heathrow) and parts of Kent, Essex and East Sussex. This indicates the need for a sub-regional approach, relating sectors of outer London (and their linkages to central London) to adjoining wedges and corridors in the wider south-east.

Pertinent to this is London Plan Policy 2.3, Growth Areas and Coordination Corridors, which link London to the wider region along the main transport spines. I am surprised the spring papers do not refer to this existing policy; while its collaborative intentions do not appear to have been pursued, it does provide a

framework for relating outer London to areas beyond, along strategic corridors. Policy 2.3 needs bringing into the debate as a basis for providing a spatial analysis of how the above issues could play out in the varying geographical contexts.

Taking this forward could engage the sub-regional dimension of the London Plan process with bodies at the strategic scale, which could include LEPs, in these varying parts of the wider region. His would enable exploration of prospects for further housing and economic development alongside infrastructure enhancements, environment and green belt situations.

## Conclusion: Form, Function and Pragmatism

I have argued above that to be fit for purpose, new cooperative arrangements between the London Mayor and representative bodies in the wider south-east need to derive from a thorough appreciation, evidence-based, of the cross-boundary issues and challenges: only in this way can they be effectively addressed and a mutually agreed policy framework conceived. However, I acknowledge that the present situation requires a pragmatic approach to what can practically be agreed in the short term, and there is a good case for moving incrementally. His would mean establishing early joint arrangements this coming winter, based on an initial appreciation of the issues to be addressed, and subsequently to analyse those issues further. In so doing, there can be incremental movement to strengthen and extend the cooperative arrangements and mechanisms. Ultimately, my experience tells me that there will need to be a formal joint structure – a newly conceived SERPLAN-type body, voluntarily established (not by Government) and adequately resourced. But I accept we are some way from that.

\* M. Simmons: 'How to meet London regional housing needs - a new SERPLAN? Town & Country Planning, 2015 Vol.84, January, 20-25

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