



**South East Strategic Leaders and South East England Councils
(Examination in Public IDs 2448 and 3133)
London Plan Examination in Public – Matter M10
Spatial Development Strategy**

M10 – Should the vast majority of London’s development needs be met within London?

a) Is the approach of seeking to accommodate the vast majority of identified development requirements between 2019 and 2041 within London justified and would so doing contribute to the objective of achieving sustainable development?

b) Alternatively, would accommodating more of London’s development needs in the wider South East and beyond better contribute to the objective of achieving sustainable development?

c) If so, is there a realistic prospect that such an approach in London and the wider South East could be delivered in the context of national policy and legislation?

SESL/SEEC comments on part (a)

1. It is welcome that the Plan seeks to meet the vast majority of London’s housing needs within the capital. SESL and SEEC warmly welcome the Plan’s ambition to achieve a sustainable step-change in growth, to deliver the majority of London’s housing and other needs within its boundaries.
2. In seeking to accommodate this scale of growth within London’s boundaries, the Plan should include further information on: how the necessary increase of 50% over on current housing delivery will be achieved; how the gap of 1,065 homes per year will be filled; and, what happens after the Plan’s initial 10-year targets.
3. There would be a range of potentially serious consequences, counter to sustainable development, if housing delivery within London does not increase above current levels and fails to deliver the requirements set out by the Plan. Beyond London, these consequences could include increased commuting, increased trends towards migration and pressure for more housing land and development. London’s bus, tube and cycle networks surpass provision outside London, and therefore accommodating London’s housing need within its boundary is the more sustainable option.
4. Whilst local circumstances vary, it cannot be assumed that authorities and communities in the wider South East would be able to accommodate additional unmet housing needs from London. Many of our member authorities already have their own challenging growth demands and

constraints, as well as facing similar challenges as London in ensuring delivery of housing and securing infrastructure funding.

5. Housing delivery shortfalls within the capital should be a matter for London to deal with, perhaps by means of a review of the Plan or alterations to it. There may also be merit in the Plan identifying a trigger point for such a review or alterations – a specific number of years of failure, for example.

SESL/SEEC comments on parts (b) and (c)

6. As explained above, whilst local circumstances vary, it cannot be assumed that authorities, towns and cities in the wider South East would be able to accommodate additional unmet development requirements from London. Many authorities in the wider South East already have their own challenging growth demands and constraints, and are facing similar challenges as London in ensuring the delivery of housing and securing infrastructure funding. Planning for development and growth in the wider South East, outside London, is the responsibility of councils in those areas through local plans and other infrastructure and related growth plans. Local housing plans outside London already allow for a level of natural migration out of the capital but it is not reasonable or sustainable for London to knowingly impose additional growth on neighbouring areas.
7. The wider South East has delivered some of the highest housing completion rates in the country. However, this growth has far outpaced the delivery of the infrastructure that is needed to sustain it. Parts of the wider South East are at breaking point with, for example, severe congestion on the roads, overcrowded trains and lengthening waiting times for health facilities, all of which increase challenges to businesses and the quality of life.
8. Nonetheless, as the home to strategic gateways, with links to Europe and beyond, and routes to the rest of the UK, as well as its contribution to the capital's workforce, the wider South East remains critically important to national productivity. The South East and London are the drivers of the national economy, home to the UK's largest populations, and consistently deliver the highest homes growth and net financial returns to the Treasury. It is, in part, the strong interdependencies between the areas that make them both successful. But it is important to recognise that the wider South East is more than a commuter economy and areas outside London have strong economies in their own right, which need investment to sustain and grow, supporting local growth plans – and continuing to make a vital net contribution to UK-wide public finances.
9. The challenges for the wider South East of any additional inward population flows would include pressure on already stretched infrastructure provision and service capacity, and finding suitable sites to deliver growth sustainably. In particular, greater flows of residents commuting into London would undermine sustainable development.

Willing partners

10. Despite the Mayor's welcome aim to accommodate the vast majority of London's growth in its own boundaries, the Plan explains he is interested in working with 'willing partners' for growth beyond London. The Mayor sees exploring options to accommodate housing growth outside London as a 'prudent long-term contingency'. The Mayor is also looking at the scope for substituting some industrial capacity, moving jobs outside London where there are mutual benefits for areas that choose to cooperate on providing sites for homes and/or jobs (Policy E7.F).
11. SESL and SEEC acknowledge the Mayor's wish to plan for longer term contingencies with regard to future growth and the Mayor's interest in working with willing partners beyond London to explore if there is potential to accommodate more growth in sustainable locations.
12. There has, however, been little sustained attempt by the GLA to identify, establish or develop working relationships with authorities who could be potential willing partners for growth. The Plan needs to specify how this would work in practice and the benefits that would accrue to authorities in the wider South East as well as London. Further information is needed on how the Mayor can support the need for infrastructure investment required to underpin the delivery of growth outside London as part of any 'willing partner' deals.

Realistic prospects?

13. Councils in the wider South East are already planning and delivering high housing growth; this includes an allowance for migration from London as well as meeting significant local demand. However, many face significant constraints (such as Green Belt, AONB, National Parks, SSSIs and SPAs) and overstretched infrastructure that prevents them offering to accommodate further London growth.
14. There, might, however be parts of the wider South East willing to explore the potential for, and benefits of, accommodating jobs or London's unmet housing needs in return for mutual benefits. However the Mayor's process for this engagement or benefits for areas outside London has not been clear.
15. The desire of any local authorities and communities in the wider South East to accept some of London's industrial capacity or activities, as proposed in Policy E7, would need to be explored in a structured way by the GLA, with proper consideration of the potential impacts in both London and the communities outside London. It is not clear, at this stage, that there is any interest from communities, businesses and authorities outside London to such an approach.
16. To help councils outside London consider whether they may be in a position to discuss being a willing partner for growth, clarification is needed in the Plan on the benefits to councils and what the Mayor is asking for. In this way, potential partners could see if there might be mutually beneficial

outcomes, supporting their own local economic and other growth ambitions. Questions to be considered include:

- if taking extra housing growth from London is to support local social and/or economic ambitions, what infrastructure investment would come with it?
 - if relocated jobs are to support local economic growth, what type of jobs would be covered, what types of sites would be required, and how would businesses be persuaded to move?
 - what is the timescale of the Mayor's 'long-term contingency'? How does this fit with local plan preparation in the wider South East, which are already looking at least 15 years ahead?
17. The Mayor should undertake a formal call for interested councils outside London to come forward who want to discuss being a willing growth partner. This would provide a more transparent and certain approach than informal discussions.
 18. Many SEEC and SESL members think it is highly questionable whether the housing markets outside London in the wider South East will have the capacity to deliver not just a boost in supply to meet their own needs but also additional housing to help meet London's needs. This is a concern not just in terms of the availability of deliverable sites (taking account of constraints such as the Green Belt and Areas of Outstanding Natural Beauty) but also in terms of what local markets can realistically support and existing infrastructure deficits.
 19. There are already pressures across the wider South East in providing for growth and delivering the infrastructure to support it. Authorities are facing increasing challenges to meet their own growth requirements, with the need for major infrastructure proving a significant hurdle and constraint to major growth. Any additional housing pressures from London cannot be subsumed without significant investment in strategic infrastructure.
 20. There is a risk that provision made to help London will result in dormitory settlements with working populations commuting into London, but with no local improvement in facilities.
 21. SESL and SEEC are not convinced that there are many suitable or sustainable locations in the wider South East for accommodating additional growth from London. Any locations with potential would need careful consideration by their local authorities, utility and service providers and other partners.