
New London Plan Examination

Further Written Statement submitted on behalf of Wates Developments,
Gallagher Estates, Lands Improvement Holdings and Cala Homes
(‘Housebuilders Consortium’ ID: 3172)

**Matter 16:
The Wider South East and Beyond**

December 2018

New London Plan Examination

Response to Panel's Matters for Consideration at the Examination in Public

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The Wider South East and Beyond**

**Barton Willmore LLP on behalf of
Wates Developments, Gallagher Estates, Lands Improvement Holdings and Cala
Homes ('Housebuilders Consortium' ID: 3172)**

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INTRODUCTION

- 1.1 Barton Willmore LLP is instructed by a Consortium of housebuilders and land promoters comprising Wates Developments, Gallagher Estates, Lands Improvement Holdings and Cala Homes to submit this further written statement in response to the Panel’s Matters for Consideration at the Examination in Public (NLP/EX/08b).
- 1.2 These representations address the inability of the London Plan to meet the full objectively assessed housing need within London and, therefore, the imperative for the Plan to secure an effective policy basis for unmet housing need being planned for and accommodated within the Wider South East.
- 1.3 The Consortium’s further written statements expand upon the representations submitted by Barton Willmore on behalf of the Consortium at the draft consultation stage of the Plan’s preparation.

RESPONSE TO MATTER 16: THE WIDER SOUTH EAST AND BEYOND

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

- 16.1 Firstly, as we outline in response to Matter 10, accommodating London’s full housing needs will require substantial unmet need being accommodated beyond London’s boundary within the WSE. The NLP should include an effective strategy to help deliver this.
- 16.2 Having regard to experience of effective cross-boundary cooperation within individual WSE HMAs, planning for development and growth across the whole of the WSE would likely require a shared evidence base. This evidence should inform consideration of growth options including the potential of each local area to accommodate unmet need in addition to its own housing need. In many respects, progress which has been made since the introduction of the duty to cooperate in 2011 including the structures for joint working should enable this work to be undertaken rapidly.
- 16.3 The NLP should commit the Mayor and the WSE authorities to completing the preparation of this joint evidence base and to agree the apportionment of London’s unmet housing need across the WSE. This should have been completed already and is urgently required in order to avoid a substantial failure to meet housing need in London and, therefore, nationally.
- 16.4 Through modifications to Policies SD2 and SD3, the NLP should quantify the unmet housing need arising from London which the WSE authorities should seek to accommodate. Policies SD2 and SD3 should commit the Mayor and the WSE authorities to a deadline for completing the evidence base and agreeing the strategic apportionment of unmet need. We consider that this deadline should be no later than December 2021.
- 16.5 Of course, in advance of 2021, individual authorities or authorities working jointly at a smaller scale within the WSE from pro-actively accommodating proposals to help meet London’s housing need. Having regard to the usual timescales involved in the preparation of Local Plans, there is every prospect that the strategic cross boundary evidence gathering and collaboration across the whole WSE would ‘dovetail’ with Local Plan reviews commencing during 2019 onwards.

16.6 Notwithstanding our position, we also recognise that the Panel could conclude that the unmet housing need arising from the NLP is no greater than as submitted i.e. approximately 1,000 homes pa (albeit it is disappointing that the NLP fails even to provide an effective strategy for this level of unmet housing need, which we do not expect to be accommodated on an ad-hoc basis).

16.7 Even in this scenario, it would be unsound in our view for the NLP to be adopted without a contingency strategy for a potentially much higher level of unmet need arising. This approach should include a requirement for WSE authorities to allocate ‘reserve’ sites, to be released for development if monitoring demonstrates that the NLP is failing to deliver the level of housing required within London.

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?

16.8 In principle, the Consortium supports the inclusion of Policies SD2 and SD3 and considers policies for the WSE to be necessary. However, for the reasons explained above and in our further written statement for Matter 10, Policies SD2 and SD3 as proposed are wholly inadequate and will fail to secure the delivery of housing need within London and the WSE.

16.9 The policies should be modified to ensure that they will support the achievement of sustainable development. As set above, such modifications should positively plan for an effective strategy for the realistic scale of unmet need required to be accommodated within the WSE. Alternatively, the NLP should be modified to require WSE authorities to include reserve allocations, to be released if monitoring of the NLP shows that there is a shortfall in housing delivery against the NLP’s unrealistic targets.