

**BY EMAIL: [yourviews@london.gov.uk](mailto:yourviews@london.gov.uk)**

1300/A1/MK/dw

9<sup>th</sup> December, 2016

Dear Sir/Madam,

**FULL LONDON PLAN REVIEW 'A CITY FOR ALL LONDONERS' CONSULTATION:  
JOINT RESPONSE SUBMITTED ON BEHALF OF RICHBOROUGH ESTATES AND GALLAGHER  
ESTATES**

**INTRODUCTION**

We are pleased to submit these representations on behalf of Richborough Estates and Gallagher Estates in response to the Greater London Authority's (GLA's) 'A City for All Londoners' consultation document.

As background, our clients own or control significant areas of land which is promoted for residential and mixed use development across the Wider South East (WSE). This includes the promotion of land for consideration through the preparation of Local Plans, which frequently involves consideration being given to the extent of cross boundary cooperation on strategic planning matters and seeking to ensure that objectively assessed housing needs are met in full.

For the reasons set out below, we support the GLA in initiating a full review of the London Plan. In particular, we fully support the recognition within the consultation document that growth will need to be accommodated outside of the capital:

**"... while [the GLA] want to contain most growth within London, [the GLA] also want to agree joint infrastructure investment corridors (where infrastructure is planned to open up housing and other development) that stretch out beyond London's borders.**

**This will require close collaboration with neighbouring authorities in the Wider South East."**

The Consortium notes that the consultation document follows the publication by the GLA of a report in January 2016 entitled 'Up or Out: A false choice. Options for London's Growth'. In respect of "building outside London", the report set out that:

**"Dialogue with the rest of the south east is vital if London's growth can be accommodated and to do so will require establishing effective regional co-operation on new housing."**



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**“Directing London’s growth away from its current boundaries would require some kind of joint strategic plan on a regional level covering London as well as the Home Counties.”**

It is recognised that the reintroduction of any form of regional plan would run counter to the Government’s planning agenda, the Consortium fully supports strategic collaboration and greater coordination to help plan for any ‘overspill’ of housing which will arise from the London Plan Review.

## **CONTEXT**

The Further Alterations to the London Plan (FALP) was prepared primarily to address key housing and employment issues emerging from the London Strategic Housing Market Assessment (SHMA) which was based upon up-to-date data and forecasts produced after the publication of the London Plan in July 2011.

The London SHMA identified that meeting the objectively assessed housing need, including the significant backlog that already existed, would require 49,000 - 62,000 dwellings per annum (dpa). This compares with a minimum overall target of 42,389 dpa in the FALP.

**The FALP results in an unmet housing need of around 6,600 homes a year up to 2036 (132,000 homes, up to 2036).**

As we review below, there are a range of structures in place across the WSE for cross boundary cooperation. Indeed, many of these forums have previously participated through the FALP Examination and/or are in ongoing discussions with the GLA.

In recognition of the legal and policy framework requiring early, continuous and effective joint working on strategic planning matters, it is vitally important that the GLA does all that it can to encourage local authorities within the WSE to take into account the shortfall arising through the FALP and the emerging London Plan Review.

Equally, we strongly encourage all local authorities within the WSE to engage positively and constructively, rather than merely refusing to assist on the basis that there are constraints which may restrict development in their own areas. Positively, there is evidence that there is constructive engagement taking place between the GLA and local authorities across the WSE.

A continuation of this substantial under-provision of housing is untenable. In preparing their Local Plans, local authorities throughout the WSE, within development and infrastructure corridors, and in other growth opportunity areas, must now begin to take account of the unmet housing needs arising from London.

## **THE SCALE OF THE PROBLEM**

As set out above, the FALP results in a shortfall of around 6,600 dpa. This shortfall equates to approximately 2,000 additional homes in each of the 67 local authorities within the South East if distributed pro-rata over the FALP’s 20 year plan period. It is a significant failure of both the current London Plan and the preparation of Local Plans by local authorities within the WSE that this fundamental planning matter remains unresolved.

There is virtually no indication currently that WSE authorities are actively and positively seeking to help address this shortfall through recently adopted or emerging Local Plans. Setting aside unmet housing need also arising within the WSE itself, due to the gap between up-to-date OAN figures and housing policy requirements in adopted and emerging Local Plans, the scale of the shortfall in housing provision is substantial.

**The latest evidence base prepared on behalf of the GLA to support the London Plan Review indicates an OAN of 55,000 to 60,000 dpa. Furthermore, subject to the adoption of the Local Plan Expert Group's recommendations for an alternative method for calculation, the OAN could increase further to 70,000 dpa or more<sup>1</sup>.**

Furthermore, it is not clear whether the social and economic effects of expanding Heathrow Airport (following the Government's announcement in October 2016) have been taken into account in the GLA's forecasts. The OAN, within London and within the WSE, could therefore increase further still as the London Plan Review progresses through 2017-18.

It is virtually certain that an outcome of the London Plan Review process will be that the full level of housing need will not be accommodated within London. Having regard to the increase in London's OAN compared to the previous OAN underpinning the FALP, the scale of the unmet need arising through the London Plan Review could exceed the substantial shortfall arising at present.

It is therefore critical that local authorities within the WSE work with the GLA and seek to engage constructively to help address this issue. Plainly, it is untenable for the shortfall in housing provision to continue. Positively, there are structures in place and opportunities for this need to be positively planned for through emerging Local Plans, as we explore below.

## **EXISTING STRUCTURES FOR STRATEGIC COLLABORATION**

Within the WSE, there are a range of networks and structures already in place relating to cross boundary cooperation on strategic planning matters. Generally, the focus for these relate to the difficult but fundamental issue of planning to meet housing needs. All of the following examples are either open to the GLA or already include it within their membership.

At a regional level, **South East England Councils (SEEC)** is a partnership with the vast majority of local authorities within the region being SEEC members. SEEC has previously operated to coordinate responses to the FALP Examination and in considering strategic planning matters, for example, preparing a joint response to consultation on proposed changes to the National Planning Policy Framework ('the Framework') in February 2016.

SEEC's Executive met on 1<sup>st</sup> December, 2016 to review the main points arising from the consultation document. The agenda and reports for the meeting invited discussion including in respect of any authorities which may wish to promote their areas for additional growth to help meet some of London's unmet housing needs. This demonstrates the capacity of SEEC to coordinate WSE authorities to engage in the preparation of the London Plan Review.

The **Wider South East Political Steering Group (PSG)** provides a political forum for progressing the joint working within the WSE, lobbying for investment where necessary to promote growth in the area. Importantly, the PSG should be prepared to pursue growth opportunities in areas which could be politically sensitive. An example could be the general resistance to (additional) growth presented by authorities within the Metropolitan Green Belt. In our view, the PSG should be prepared to assess and pursue such options with the aims of maximising the opportunities for sustainable growth.

The Strategic Spatial Planning Officer Liaison Group (SSPOLG) was established following the publication of a report in October 2012 by the Mayor of London which called for greater cooperation between London and the WSE. SSPOLG led to the creation in March 2016 of the **WSE Officer Working Group (OWG)**.

<sup>1</sup> Source: WSE PSG agendas and papers 12<sup>th</sup> October, 2016

The OWG meet regularly and, like SEEC, considered the consultation document in detail at its most recent meeting held in November 2016. A presentation about the London Plan Review consultation was provided by GLA officers at this meeting. The GLA's presentation included details of 13 strategic infrastructure schemes proposed within the WSE which are to be supported by the OWG including lobbying at a political level (see further below). These schemes could potentially form the basis for focusing growth outside of the capital to help meet London's needs.

The OWG has a work programme for 2016/17<sup>2</sup> covering:

1. The London Plan;
2. Barriers to Housing Delivery;
3. Strategic Infrastructure; and
4. Shared Understanding of Evidence.

A WSE Summit is scheduled to be held on Friday, 9<sup>th</sup> December, 2016 for members of the OWG (including the GLA) and the PSG. The OWG work programme states that the aim of this Summit is to "ensure the engagement and buy-in of all council leaders across the WSE in the work of the WSE PSG. Opportunity for council leaders to contribute early proposals for London Plan and raise awareness of GLA demographic model."

The outcomes of the Summit are expected to be publicised in early 2017. We fully support the work being undertaken by the WSE OWG and PSG to promote strategic infrastructure and growth. As we turn to in more detail below, it will be critical that this work informs the preparation of Local Plans within the WSE, as this work progresses into 2017 and beyond.

## **LOCAL PLAN PREPARATION WITHIN THE WSE**

The GLA and local authorities will be very familiar with the impacts of regional planning being abolished in 2011 and the challenges encountered when seeking to discharge the legal duty to cooperate.

5 years on, with numerous failed attempts within the WSE to advance Local Plans owing to duty to cooperate failures, effective outcomes to address London's unmet housing need are absent. The position arising from the FALP, as set out above, is 'off the agenda' for local authorities which have either recently adopted Local Plans or are currently in the process of reviewing one. Worse still, the matter appears to be ignored by Inspectors appointed to examine Local Plans.

The GLA have a responsibility to engage in Local Plan preparation, to demand that the substantial shortfall in housing provision is carefully considered and opportunities for helping to meet this need explored.

Against this background, we fully support the strategic collaboration taking place as part of the London Plan Review and the supporting infrastructure studies and strategies. It is imperative, however, that this now begins to influence plan-making.

In particular, the work already completed by the GLA and the supporting networks reviewed above relating to strategic infrastructure should inform plans, to maximise the growth potential associated with this new and improved infrastructure capacity. 13 infrastructure schemes are identified for further promotion and assessment, as follows:

1. East West Rail and new road link (Oxford - Cambridge);
2. North Downs Rail Link (Gatwick - Reading);
3. A27/M27/A259 and rail corridor (Dover - Southampton);
4. West Anglia Mainline and Crossrail 2 North (London - Stansted - Cambridge - Peterborough);
5. Great Eastern Mainline (London - Ipswich - Norwich);

<sup>2</sup> Source: WSE OWG agendas and papers 9<sup>th</sup> November, 2016

6. Thames Gateway Essex: C2C and Crossrail 2 - Eastern Branch (London - South Essex / London Gateway Port);
7. Thames Gateway Kent: Crossrail 1 extension East and HS1 route (London - North Kent - Channel Tunnel);
8. Lower Thames Crossing;
9. Brighton Mainline (London - Gatwick - Brighton);
10. South West Mainline and Crossrail 2 South West (London - Surrey / southern access to Heathrow);
11. Great Western Mainline (London - Reading / western access to Heathrow);
12. Midlands and West Coast Mainline (London - Luton - Bedford / Milton Keynes); and
13. Felixstowe - Nuneaton / Midlands.

The work completed by the WSE PSG and OWG indicates that authorities within these corridors can promote themselves for growth associated with this investment. In principle, we are supportive of an approach which focuses major growth opportunities within these corridors. Such opportunities may include new settlements and major expansions of proposed commuter hubs.

This focused approach is, however, unlikely to fully address the issue. In this regard, there are other locations outside of the corridors which offer opportunities for growth to help meet the housing needs of London. These include towns and villages which are already well-connected with London (and elsewhere), together with opportunities on these existing corridors, and could deliver substantial areas of new housing in the short to medium term without the need for major new infrastructure investment.

In conclusion, therefore, we wish to emphasise the need for the GLA to use the work undertaken through the strategic collaboration already underway as a basis for promoting housing provision within the WSE to meet its needs. Barton Willmore on behalf of Richborough Estates and Gallagher Estates will support the GLA in this process and seek to ensure that effective outcomes are secured through emerging Local Plans, including opportunities for development to help meet the substantial unmet needs of London.

## SUMMARY AND RECOMMENDATIONS

There is a substantial level of unmet housing need arising from the FALP, amounting to approximately 6,600 dpa. This substantial shortfall is currently being ignored by authorities within the WSE. The London Plan Review, underpinned by the early strategic collaboration across the WSE, should provide a strong platform for addressing London's unmet housing need.

In recognition of the legal and policy framework requiring early, continuous and effective joint working on strategic planning matters, it is of critical importance that the GLA does all that it can to encourage local authorities within the WSE to take into account the shortfall arising through the FALP and the emerging London Plan Review. This may require objections to be made in due course should authorities not demonstrate a positive approach to contributing towards the aims and objectives identified through strategic collaboration.

Equally, we strongly encourage all local authorities within the WSE to engage positively and constructively, rather than merely refusing to assist on the basis that there are constraints which may restrict development in their own areas, as was the position reached through the FALP Examination. On behalf of our clients, we will seek to ensure that Local Plan Inspectors give due regard to this matter through the Examination of Local Plans.

A continuation of this substantial under-provision of housing is untenable. In preparing their Local Plans, local authorities throughout the WSE must now begin to take account of London's unmet housing needs. We support an approach whereby major opportunities could potentially be focused within the identified growth corridors associated with the strategic infrastructure schemes identified above. Other development opportunities at existing well-connected commuter hubs within the WSE will however be both appropriate and necessary in order to get close or meet the needs of London in full.

We look forward to future opportunities to participating in the preparation of the London Plan Review and would welcome an opportunity to meet with the GLA to discuss this submission.

Please contact the writer on 0118 943 0000 or by emailing [michael.knott@bartonwillmore.co.uk](mailto:michael.knott@bartonwillmore.co.uk) should you have any queries or require any additional information.

Yours faithfully,



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