

From: Mark Behrendt <mbehrendt@elmbridge.gov.uk>
Sent: 09 December 2016 09:36
To: Your Views
Subject: Surrey Planning Officer Association response to “ A City for all Londoners”

I am writing on behalf of the Surrey Planning Officers Association which represents the heads of planning of the Surrey local authorities, in response to your consultation on your vision for London set out in , ‘A City for all Londoners’.

We welcome this opportunity to respond to the document, which sets out the issues facing London and Londoners and how you plan to respond to these and shape London’s long term future. As you know, Surrey, like other areas adjacent to London, has significant links to the capital in terms of commuting, infrastructure and our economy and consequently London’s future development is an extremely important issue for local authorities in Surrey. Therefore, it is important that we work together in partnership to develop strategies that support both London and its neighbours in the Wider South East (WSE) by addressing issues of common concern and contribute to our collective economic success.

Considering the commitment already shown as part of the preparation of the London Plan to engaging with the WSE, we were disappointed not to have been consulted directly on this document. We therefore hope that you will in future consult directly with district, borough and county councils not only in Surrey but across the WSE on such matters, in line with the duties to consult and inform and the duty to co-operate.

We recognise that this consultation is about the breadth of challenges and issues facing the Mayor and your approach to addressing them. However, we would like to focus on how these will be taken through the London Plan and the impact on Local Plans being developed across Surrey at present. These concerns are set out below.

Meeting needs for housing and other development

The Government is clear that all local planning authorities should seek to meet the growth needs for their areas. Whilst we note the aim of meeting London’s needs within the capital clear and robust evidence will need to be seen before we are assured that the Mayor will be able to achieve this aim through the intensification of development around suburban transport nodes and creating more mixed use development in town centres. However, in taking this approach we would urge you to think more creatively when meeting this need in order to create sustainable communities. These communities must be places that people want to live and that provide the right mix of housing not only in terms of tenure but also size and type as well as the necessary services and employment opportunities.

Local authorities across the WSE are being proactive about assessing Green Belt to ensure that it is not keeping land permanently open where it no longer meets the purposes of that designation. As the evidence shows London as having a very high level of housing need, we are concerned that you have clearly discounted the potential that may be available within the Green Belt to meet needs. We consider the position that the Green belt should be protected at all costs in the absence of understanding how it may continue to serve the purposes of the designation to be both short sighted and inconsistent with national policy. Only once the GLA has undertaken a Green Belt review as part of the process in meeting unmet need should it ask authorities from the wider South East whether they can meet some of the capital’s shortfall.

We would therefore encourage you to undertake a review of Green Belt (and Metropolitan Open Land) to determine whether there are any areas of land, however small, that do not fulfil the purposes of these designations and could provide development opportunities. We consider this will be essential to achieving a robust understanding of whether London is able to meet its own development needs.

Engagement with the Wider South East

We support your commitment to work constructively with local authorities in the WSE. We would urge you to be transparent and clear in your engagement with us. In particular we would like to understand, as soon as possible:

- The anticipated scale of any unmet development needs within London
- The options for meeting any unmet need which the Mayor would like to consider in partnership with the Wider South East
- The type and level of support and resources/investment that the Mayor may be able to offer local authorities who

can assist in meeting any of London's unmet needs.

We would like to highlight at this early stage that all authorities in Surrey, like many other areas in the WSE, have their own growth challenges and constraints which mean that they may not be able to meet their own objectively assessed development needs (which already include an element of housing to cater for migration from London), let alone contribute to meeting additional needs from London. Within this context, we note from the consultation document that the Mayor wishes to agree joint infrastructure investment corridors that stretch out beyond London's borders which could open up housing and other development. We would welcome an early discussion with you and other relevant authorities about the constraints and opportunities that exist along the following transport corridors:

- London - SW corridor
- London - Gatwick/Brighton corridor

We also believe that the Government's recent preference for a new north west runway at Heathrow Airport, which could have significant implications for London and surrounding authorities in the WSE, needs to be taken into account as part of the London Plan review. This decision to build a new runway at Heathrow could be adopted as national policy before the London Plan is examined and to ignore the impact of such a significant piece of infrastructure would be a major omission.

Conclusion

In conclusion, we welcome recognition of the need for joint working with the WSE to resolve the spatial planning challenges we all face. Any discussions about growth outside London should include cooperation with all surrounding local authorities. This will inevitably be a substantial exercise, but essential nonetheless, and we remain committed to working constructively with you in this regard.

Therefore, we would be concerned if the next formal opportunity to input into the new London Plan is at the 'draft plan' stage. We consider there would be benefit if the Mayor were to consult at an early stage on plan options through agreed cooperation arrangements with the WSE to ensure that there is, as far as possible, buy-in from partners and stakeholders to the Plan's overarching growth and spatial strategy

I trust you will find these comments helpful and I hope we will be able to work together to deliver mutual benefits for both London and the wider south east region.

Yours sincerely

Mark Behrendt

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