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Dear Mr Mayor

## **Epsom & Ewell Borough Council Response to the Draft London Plan 2019 – 2041 Consultation**

Thank you for providing Epsom & Ewell Borough Council the opportunity to comment on the draft London Plan 2019 – 2041. As a neighbouring borough, we are particularly interested in those cross-boundary strategic planning issues that could have implications for the Borough and for its own Local Plan preparation as well as how the benefits of growth and development in London could be shared with other local authorities.

We have carefully considered the draft London Plan and enclose our formal response to your consultation exercise.

In summary, we would like to convey our general support for the draft policies and policies and welcomes the new concept of 'Good Growth'. In particular we support the objective of meeting the vast majority of London's anticipated housing needs within the capital's administrative boundary. We also support your commitment to work collaboratively with local authorities in the Wider South East on shared strategic concerns, particularly on barriers to housing and infrastructure delivery and factors that influence economic prosperity. Finally we welcome your approach towards the provision of new affordable housing – we hope to take a similar position when we review our own policies.

We look forward to further iterations of the plan and would welcome further co-operation especially in regards to the proposals for Kingston in terms of their Opportunity Area and also the mutual benefits of any over delivery in their housing target.

If you would like to talk through our representations, please contact Karol Jakubczyk at [Kjakubczyk@epsom-ewell.gov.uk](mailto:Kjakubczyk@epsom-ewell.gov.uk) .

Yours sincerely



Mark Berry  
Head of Place Development

## **1. Introduction and Overview**

As a neighbouring borough, Epsom & Ewell Borough Council is particularly interested in the cross-boundary strategic planning issues that could have implications for the Borough and for its own Local Plan preparation. The Borough Council is also interested in the potential benefits that may come with the growth and development in London and how these could be shared with other local authorities.

Having reviewed the Draft London Plan, the Borough Council conveys its general support for the draft policies and policies. The Borough Council welcomes the new concept of 'Good Growth', which the Mayor defines as growth that is socially and economically inclusive and environmentally sustainable (cross-cutting policies). Specifically, the Borough Council supports the Draft Plan's aim of meeting the vast majority of London's anticipated housing needs within the capital's administrative boundary. The Borough Council also supports the commitment to work collaboratively with local authorities in the Wider South East (WSE) on shared strategic concerns, particularly in resolving barriers to housing and infrastructure delivery, and factors that influence economic prosperity.

The Borough Council also welcomes the affordable housing thresholds being sought in the Draft Plan.

Notwithstanding the above, in responding to the consultation in further detail, the Borough Council has provided comments under the following headings:

- calculating housing need and taking account of the Government's proposed standard methodology;
- the delivery of the housing target and responding to unmet need;
- ensuring the delivery of infrastructure;
- the type of homes to be delivered;
- the need for a review of Metropolitan Green Belt and Open Land; and
- the duty to co-operate regarding cross boundary and strategic issues relating to the London Plan.

## **2. Calculating housing need**

The draft London Plan sets out an overall target of 66,000 new homes every year for a 10-year period between 2019/20 and 2028/29. The Borough Council welcomes the increase proposed from the current target of 49,000 as set out in the Further Alterations to the London Plan (FALP) (2015).

In relation to identifying an Objectively Assessed Housing Need (OAHN) figure, the Borough Council highlights that should the government's proposed standard methodology (Planning for the right homes in the right places, September 2017), be applied then a much higher figure would be required. This figure of about 72,000 homes should be provided across London per annum. The Borough Council understands that the Greater London Authority's (GLA) figure of 66,000 new homes is based on its own projections which differ slightly due to the longer time periods and trends data applied.

On that basis the Borough Council supports the identified housing need for London of 66,000 homes per annum. But in doing so the Borough Council calls upon the Mayor to support other Local Planning Authorities (LPA) outside of London should they also choose to deviate from the proposed standard methodology, using the same approach as the GLA as part of their own individual Local Plan preparation. We consider this a sound and reasonable request – especially so as many areas and locations within Epsom & Ewell are contiguous with and cannot be disentangled from greater London. It would be unsound for the London Mayor to take a contrary position.

### **3. The realistic nature of whether such housing targets can be achieved and responding to unmet need**

The Borough Council appreciates the acknowledgement of the series of complex and interlinked sub-markets (paragraph 4.1.2 of the draft London Plan) and the opportunity that exists within London to plan strategically. This provides the ability to set individual targets within London based on opportunities for development and the sustainability of locations.

Whilst the Borough Council welcomes the proposed increase in housing targets across London, the challenge of responding to the residual unmet need remains. The Borough Council notes the GLA's policy push to expect Outer London Authorities to deliver an increase in housing is a shift from previous London Plans that sought a continued reliance on Inner London to deliver the homes Londoners require. This has been a key issue for those authorities outside of London and particularly in those areas on the fringe of the GLA area, as any under-delivery has tended to place increased pressure on housing delivery in such areas. The Borough Council like many other Surrey planning authorities is already grappling with the challenge of its own high housing need, a limited supply of housing land and a significant proportion of land constrained by environmental designations and Green Belt designation.

The Borough Council acknowledges that to deliver the increase in homes planned; a shift in delivery will be required. This may include new higher density developments and an increase emphasis upon the delivery of small sites. It is anticipated that this approach will require increased funding and investment from Government particularly in terms of infrastructure.

### **4. Ensuring the delivery of infrastructure**

It is important for the London Plan to recognise that as a consequence of London's growth there will be impacts on infrastructure provision beyond the GLA's administrative boundaries. In supporting the call for increased funding and investment into London, the Borough Council asks the Mayor to consider how any improvements can benefit authorities outside London, acknowledging that infrastructure and its funding is a key-cross boundary issue.

The Surrey Infrastructure Study (commissioned by the Surrey local authorities) highlighted significant funding gaps to enable the delivery infrastructure needed to support growth within the county. In light of this, it cannot be assumed that cross boundary impacts can be mutually off-set by investment in Surrey (or indeed elsewhere outside London). This could be applied at a borough level, for example,

Epsom & Ewell benefits from extensive strategic open space provision, which serves neighbouring London and Surrey boroughs as well as being enjoyed by our own residents. To ensure this valued asset can respond to the growth of neighbouring boroughs it is increasingly legitimate for the Borough Council to look to its neighbours to contribute to the necessary investment.

To address concerns over housing and infrastructure delivery, the London Plan should therefore be accompanied by both a robust monitoring framework and a risk management plan that should be developed with partners (including those beyond the GLA administrative boundary). These would inform partnership working between London and the outer London authorities on strategic concerns such as barriers to housing and infrastructure delivery (Policy SD2 E) and with willing partners to identify growth locations as longer term contingencies to accommodate growth (Policy SD3).

In terms of risk management, specific arrangements with groups of authorities in London and neighbouring authorities should be explored, particularly for those such as Epsom & Ewell that are in close proximity to proposed Opportunity Areas. This is especially important for the delivery of cross border transport and enabling infrastructure where delivery would be of mutual benefit.

## **5. The types of homes to be delivered**

It would appear that to increase housing delivery within London, the draft Plan is seeking to increase densities on most sites, principally those in key locations such as transport hubs and in town centres. This is mostly evident through the introduction of a small sites target for each London Borough.

Whilst the concept of *optimising* densities is supported in principle, the Borough Council is concerned about the type of homes that will be delivered. The focus on higher density development across London and, within the Opportunity Areas in particular, is likely to only yield high-rise development of 1 and 2-bedroom units. The London Strategic Housing Market Assessment (2017) identifies smaller units as the predominate need. However, 29% of London's housing need consists of family sized homes (3 and 4+ bedrooms). Where does the Mayor anticipate that need being met? The draft Plan is silent on this matter.

Furthermore, by continuing to focus on increasingly higher densities (and thus the delivery of smaller units) this approach fails to provide for the varying types of homes required. Inevitably this will lead to increased out-ward migration from London into neighbouring boroughs and districts putting significant pressure not only on their need to deliver more homes but also the supporting infrastructure required to support such growth. This includes schools, public services such as Health Centre and, in particular road and railway infrastructure for which, there is already some deficit.

## **6. A review of the Metropolitan Green Belt and Open Land**

The Borough Council notes that throughout the draft London Plan there is the presumption in favour of developing previously developed land and that the continued protection of Green Belt, Metropolitan Open Land (MOL) and other open land is advocated. Policy G2 B does not support de-designation of Green Belt in

London although the supporting text at paragraph 8.2.1 highlights that the processes and considerations for defining Green Belt boundaries are set out in the NPPF.

The Borough Council supports the continued protection of the Green Belt. However along with its housing market area (HMA) partners, the Borough Council is under pressure to assess and review its Green Belt boundaries. The Borough Council has no choice but to undertake this approach in order to determine the extent to which its emerging local plan update can meet identified objectively assessed needs in a sustainable way (that is consistent with the policies of the NPPF, including the long term protection of the Green Belt).

Whilst the approach to developing on brownfield land first is supported, it is considered that beyond the first 10-year period (2018/19 – 2028/29), London will have reached a point where the Mayor will need to look at all options available. If the consequence of London boroughs not being able to undertake alterations to the Green Belt to allow for development is that they cannot meet their housing needs, then this could put pressure on surrounding districts in the WSE. The Borough Council highlights that many boroughs and districts in the WSE are also constrained and are struggling to meet housing needs, particularly where their housing market area overlaps with an adjoining London borough. The Borough Council does not want to be in a position where it has no alternative but release Green Belt land because a London borough in their housing market area is unable to release Green Belt land (to help meet the HMAs need). On that basis the Borough Council consider it important that London boroughs be able to undertake alterations to the Green Belt boundary in their own areas where there is evidence to demonstrate that there are exceptional circumstances, including meeting objectively assessed housing needs in full.

The Borough Council remains unconvinced that the proposed Kingston Opportunity Area (Policy SD1) and the links to increased development opportunities in the Chessington area (including up to 9,000 homes) as a result of Crossrail 2 South, can be achieved without potential releases of Green Belt land. The alternative would undoubtedly completely change the character of the area by extensive intensification of development on existing developed sites. This proposal clearly needs considerably more thought and attention than has been given to date. The Borough Council would welcome working with the GLA and the Royal Borough on developing an approach that could be sustainable for the wider area.

## **7. Duty to Co-operate**

Throughout the original London Plan and the FALP, the need for a partnership approach to plan-making and addressing the key strategic issues, both by the Mayor and individual London Boroughs, was clearly stated. This has continued through to the new draft London Plan with a specific policy focusing on collaboration in the Wider South East (Policy SD2).

As a local authority immediately adjoining the Greater London boundary, it is extremely important that Epsom & Ewell continues to be informed of the continued development of the new London Plan. In particular, the proposed Kingston Opportunity Area.

However, relating back to the Mayor's own comments regarding the series of complex and interlinked sub-markets, the Mayor should acknowledge and recognise the findings of the Kingston & North-East Surrey SHMA (2016). This evidences that Kingston-upon-Thames falls within a sub-housing market area that includes the Surrey Authorities of Elmbridge, Epsom & Ewell and Mole Valley.

On this basis, the Borough Council disagrees with the Mayor's statement that because of London's ability to plan strategically, boroughs are not required to carry out their own housing needs assessment but must plan for, and seek to deliver, the housing targets in the Plan.

Kingston is part of the Kingston and North-East Surrey Housing Market Area (HMA) and the Mayor is required to acknowledge this under the duty to co-operate. It is therefore the Borough Council's view that any housing delivery over the housing target for Kingston, as set out in the London Plan, is equally apportioned to London and the remainder of the Kingston & North-East Surrey HMA. This would also include a proportion of any housing delivery provided through the Opportunity Areas. Such an approach would recognise the linkages that exist between these areas, emphasising and truly embracing the duty. It is considered that the Planning Inspector would recognise the benefits of such an approach and the logic and pragmatism behind it and would expect this to be fully explored through a Statement of Common Ground with the HMA authorities.

## **8. Conclusion**

Whilst the Borough Council welcomes the proposed increase in the London housing target, concern remains as to the number and type of homes that will be delivered and the pressure this could place on authorities outside of London to provide more family homes. The Borough Council also continues to call for the Mayor to lead a review of the Metropolitan Green Belt and Open Land. This is required to ensure a consistent approach to seeking opportunities to deliver growth beyond the London Plan period (2028/29). Such a review would have to actively involve all of those boroughs and districts that have Metropolitan Green Belt (such as Epsom & Ewell) but are outside of the GLA administrative area. To do anything other would be unsound.

To be sustainable, housing growth must be supported by infrastructure and any improvements to the same can be of mutual benefit to London boroughs as well as authorities outside London. It is important that the London Plan acknowledges that infrastructure and its funding is a key-cross boundary issue.

The Borough Council looks forward to any further iterations of the plan and would welcome further co-operation regarding the proposals for Kingston in terms of the Opportunity Area and also the mutual benefits of any over delivery in their housing target.