

Sadiq Khan (Mayor of London)
New London Plan
GLA City Hall
London Plan Team
London SE1 2AA

Our ref: Consultations/London Plan
Your ref: Draft New London Plan
Date 9 March 2018

Dear Mr Khan,

Draft New London Plan (February 2018)

This representation is on behalf of the **Gatwick Diamond Group of Local Planning Authorities** and has been prepared by Planning Officers.

More information on the Gatwick Diamond Grouping can be found at <http://www.gatwickdiamond.co.uk>.

The constituent authorities may submit additional views to those included below.

The Gatwick Diamond Authorities welcome the invitation to comment on the draft London Plan given the close relationships between the respective planning areas in terms of functional economic, housing, infrastructure, community and other links.

This interrelationship is recognised in the Gatwick Diamond Local Strategic Statement which has been recently revised and can be found here <https://www.horsham.gov.uk/planningpolicy/planning-policy/gatwick-diamond>.

It is noted that, to a greater extent than previously, the draft London Plan recognises that London's housing needs should and will be provided for within the administrative London area and not be displaced. This includes recognition that affordable housing priorities are essential. This is welcomed as being of significant importance to the proper planning and sustainable growth and prosperity in the Gatwick Diamond area.

The Gatwick Diamond Authorities recognise that planned housing growth does offer advantages to the area. The Diamond Area has experienced substantial housing growth, with some linked to the displacement of London-based housing need. Some of this is unplanned, operating through planning appeals and delivering housing, some of which is not in sustainable locations. This adds to environmental stress, increased car dependency and environmental pollution.

Additional housing creates stress upon existing infrastructure and undermines environmental policies and the metropolitan green belt. This is prejudicial to and operates against efforts to promote the economic and employment growth of the area. At the same time, very high increases in house prices, partially due to the failure of London to provide sufficient housing for London's specific need including affordable housing has made housing affordability for a large section of the population in the Gatwick Diamond Area, including young people and key workers, an unattainable dream. This creates for the Gatwick Area community stress and mitigates against achieving high economic potential and prosperity.

The Gatwick Diamond authorities recognise the importance of the metropolitan green belt and metropolitan open land in London. However the Mayor has ruled out any consideration of a review of green belt within London. It is unclear if this is intended to be binding upon the local plans produced by the London boroughs. In any event, this would seem to be contrary to the National Planning Policy Framework and the draft revised National Planning Policy Framework (5 March 2018).

Outside of London and consistent with the NPPF, councils are required to consider and justify the green belt boundaries in appropriate circumstances, which may include meeting objectively assessed needs. The precedent has been set in many local plans. The Gatwick Diamond authorities consider that an objective, evidence-based approach is also appropriate within London and the case for not doing so seems to be based on a political rather than an objective judgement. This requires attention and the Gatwick Diamond authorities are happy to assist the adjacent London boroughs with an appropriate joint review.

There remains ambiguity in the draft London Plan where it is suggested that existing levels of migration of households to areas outside London will be maintained. Clarification is sought.

The Gatwick corridor is alluded to in the draft London Plan as a strategic infrastructure investment priority. The Gatwick Diamond authorities welcome the support of the draft London Plan in drawing attention to this, however the authorities are keen to ensure that the promotion of the Gatwick corridor does not mean a stretch of continuous urban development from Greater London to the South Coast. The Gatwick Diamond authorities are keen to maintain strategic, open gaps between adjacent towns.

Some of the current limitation in movement in the corridor, such as rail, is due to restrictions and lack of infrastructure improvements within the London area. An example is the need for improvements to the signalling and track in Croydon Borough. The upgrade of the Brighton main line is welcomed. Recognition of the North Downs Line as a strategic infrastructure priority is also supported.

Gatwick Diamond Authorities are concerned at the unqualified reference in **para 10.8.7** of the Plan that the Mayor "*believes that expansion at Gatwick could deliver significant benefits to London and the UK more quickly, at less cost, and with significantly fewer adverse environmental impacts*". There is support in the Gatwick Diamond area for Gatwick's continued development as a single runway, two terminal airport, but we do not believe that the case has been made for a second runway. Although we understand the concerns over the possible environmental and social implications of Heathrow expansion, Government has decided that Heathrow is the right place for additional airport capacity in the South East. It is therefore disappointing that the draft London Plan is seeking to reopen this debate.

Previously the London Plan sought to link infrastructure investment outside the London region with housing and other growth in the south east. There has been a change in direction in the draft London Plan to avoid this prescription. The Gatwick Diamond Authorities would like this to be explicitly ruled out to avoid any future ambiguity.

Instead when it comes to channelling unmet need, the draft London Plan seeks to encourage partnership working with specific areas outside of London to meet mutual objectives. This is welcomed.

However these new partnerships are seemingly few and far between and the idea is relatively undeveloped with a lack of detail as to the timing and delivery arrangements, such that these partnerships are considered unlikely to pass the test of soundness, were it to be applied to a Local Plan. There is a concern that if these untried and unproven arrangements and relationships fail to deliver, the default will revert to the previous approach.

Gatwick Diamond authorities are aware that in local plan examinations, Planning inspectors have added additional numbers to local housing targets to provide for London's unmet need. There is insufficient certainty and robustness in what the draft London Plan proposes to be persuasive if the tests of soundness which apply outside London were applied to the draft London Plan. While the

draft London Plan is not obliged to be tested to such a level of rigour, the London Boroughs' Local Plans which will continue to have a role are not able to escape this requirement.

In contrast to the seeming consensual approach with authorities outside of London, the draft London Plan is far more prescriptive with the approach to densification and housing target numbers for London Boroughs, particularly outer London Boroughs. The proportion of the identified housing need between inner/outer London has altered significantly in the draft London Plan and the level of involvement in what previously was considered to be matters to be dealt with at an individual Borough basis has greatly increased. This involvement has even been increased to the extent that GLA officers have suggested that the need for statutory Local Plans in the boroughs could be regarded as optional. There is, it is said, enough in policy terms in the draft London Plan to encourage sufficient densification to meet the housing target through development management in the Outer London Boroughs without an up to date Local Plan.

The Gatwick Diamond authorities would identify their concerns as:

1. That substantial higher housing numbers in the outer London boroughs will exacerbate commuting because patterns of movement over the London boundary are complex and two way.
2. That there is potential for better meeting a significant proportion of London housing needs by continuing the focus and level of housing growth in inner London.
3. That densification of the suburbs and the new mechanisms suggested by the draft London Plan are relatively untested and unproven. Together with a restrictive Green Belt policy, this could lead to under-provision of housing numbers against the housing requirements, and under-provision of family housing against needs, pushing unmet demand beyond the Greater London boundaries.
4. That under-providing against the identified housing need over the ten years to 2028/29 will add up to the size of a small town (10,000 dwellings), even if housing targets are met and there is no strategy to deal with this.
5. The Gatwick Diamond authorities are able to exercise the duty to cooperate and other liaison processes with the outer London boroughs in the south of London through the opportunity to discuss and engage in the process of the making of those local plans. This process will be subverted by the draft London Plan.
6. That unqualified support for Gatwick Airport expansion without requiring the same need to ensure it would not result in "additional environmental harm" as it does for Heathrow (para 10.8.7 of the draft London Plan) is a serious omission.
7. The concept of willing partners working together, such as between the GLA and other authorities beyond the London boundary, is supported. This approach should also apply to within London and the relationships between the GLA and the outer London Boroughs, otherwise there is a risk that disruption and a breakdown of working relationship will jeopardise the provision of sufficient housing within London as a whole to meet London's needs.
8. There is a substantial risk of non-delivery of the draft London Plan housing need targets. The Gatwick Diamond authorities support the need for a monitoring framework and risk management plan, which other Local Authority Groupings, such as SEEC, are also highlighting.

Yours sincerely,

A black rectangular redaction box covering the signature of Claire Vickers.

Claire Vickers

Chairman, Gatwick Diamond Members' Group & Cabinet Member for Planning & Development,
Horsham District Council