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Dear Mr Khan

The New London Plan Consultation Response from Hampshire County Council

Hampshire County Council welcomes the opportunity to provide comments on the Mayor's Plan for London. The county of Hampshire forms the south western boundary of the wider south east area, and the County Council recognises the vital importance of the inter-dependencies and dynamic relationships between London and its surrounding regions. London and the wider south east enjoy unrivalled economically prosperous positions, which are dependent on the two way relationship between the capital and its neighbours. Hampshire County Council also recognises that for this to continue, it is important to get the planning for London right, and especially the contribution made by the surrounding regions, whilst recognising the needs and pressure on those areas for which London looks to for support.

Overall, Hampshire County Council is supportive of the approach the Plan takes, particularly in relation to meeting housing need. However there is concern that the Plan is not always clear how the intentions expressed in the 'preamble' and supporting text to policies are translated into the policies themselves. In other words while intentions may be set in supporting text, unless these are clearly followed through in the policy it is unlikely that they will be realised. This is of particular concern in relation to meeting housing need.

Identified Housing Need and Willing Partners for Growth

The draft Plan now aims to meet virtually all the housing need for the Plan area within its own boundaries to 2029. Whilst this is welcomed, the County Council notes that this is a very ambitious target (65,000) and would require a

doubling of the current house building rate. Even if these rates of delivery were to be met there is still a 1,000 homes gap each year (total of 10,000 homes) that would need to be accommodated outside London. The Plan emphasises that 'willing partners' outside London might help accommodate some of its growth as 'a prudent long term contingency' if London cannot meet its housing needs. The County Council is concerned about the deliverability of the Plan based on this approach, where upon there is no comprehensive delivery strategy for the full identified need of 66,000 per annum, with a substantial quantum of identified housing need remaining unplanned for. In a district council context, this would deem a Plan undeliverable and unsound. The County Council therefore recommends that the Plan should be amended to clearly identify how this unmet need is to be dealt with, along with setting out what happens if delivery fails to keep up with the ambitious targets set out in the Plan.

The County Council acknowledges that the Plan proposes that unmet need is 'delivered' through the continued emphasis on 'willing partners'. In the wider context of the relationships between the capital and its surrounding areas, this approach is welcomed. The County Council supports authorities should they wish to embark on such a relationship with the GLA, given the points previously made about the importance of the inter-dependencies between the regions. However, what the Plan fails to reflect is the existing pressures and constraints that neighbouring authorities already face, with significant housing pressures and growing infrastructure deficiencies and expanding deficits. It is vital therefore for the Plan to set out exactly how the necessary infrastructure would be funded and provided to support any additional housing provision, should willing partners come forward. The Plan references the potential mutual benefits of working with willing WSE partners to deliver growth and infrastructure but there is little detail on delivery mechanisms. It is this lack of guarantee on the delivery of supporting infrastructure which currently restricts potential partners coming forward, even if such a move would support local growth ambitions.

The relationship between authorities in this area means that this is not just a requirement of the London Plan. The emphasis should also be on willing partners. The Plan should therefore set out how both the GLA and neighbouring authorities will work together, with one voice, to develop a clear economic strategy and Infrastructure Delivery Plan to enable all parties to lobby government for the funding and support required to ensure the growth of London continues to be supported by its neighbours, and allow all authorities concerned to continue to reap the benefits of the wider south east's economic performance.

Green Belt

The direction of the draft Plan retains the policy decision to maintain, without question, the full extent of existing Green Belt designations within the Plan area. It is the view of the County Council that given the unplanned, unmet need of at least 1,000 homes per annum (dependent on extremely ambitious

building rates), this position cannot be justified, and that the Plan should propose a considered review of the London Green Belt. This is an important point for many authorities in the Wider South East who themselves are being required to reconsider their own Green Belt designations in order to deliver their own housing need requirements. Hampshire County Council is a supporter of Green Belt policy, with green belt covering an area in the far south west of the county.

However, green belt designation is a tool to prevent the physical expansion of urban areas, and to prevent their coalescence. Given then that the majority of green belt designation in London was designated in the 1960's, many local areas have now been 'leap-frogged' by urban development in many of the London Boroughs, meaning there are substantial areas of green belt well within the London boundary. It is these areas that could potentially contribute to delivering the unmet need, and releasing pressure on other parts of the city where significant growth is being focused in order to deliver the very ambitious targets set out in the Plan. Therefore Hampshire County Council would recommend that the Plan commit to at least a partial review of the Green Belt, to identify those areas that no longer contribute to the original objectives of the green belt, but which could help to provide a specified delivery strategy for the entire housing need number.

Mutual Benefits on growth/infrastructure

Figure 2.15 in the draft Plan identifies 13 Initial Strategic Infrastructure Priorities in the South East. Hampshire County Council is pleased to see the inclusion of the A27/M27/A259 and rail corridor but is concerned that this is the only priority identified in the Hampshire area, when there are equally strategic transport corridors such as the M3, A3, A34 and the parallel railway lines to London and the midlands from the South Coast of Hampshire, which are omitted. It is also important for the Plan to acknowledge, that the inclusion of a south coast corridor, or the routes listed above, does not mean that the areas within Hampshire served by these corridors have capacity to accommodate London overspill growth. Local Planning Authorities within Hampshire are already working hard to accommodate their own needs in the context of existing pressures and deficiencies, and these corridors need further investment in to address existing infrastructure pressures and accommodate local planned for growth, they are not suitable regional locations for additional growth.

Kind Regards

A solid black rectangular box used to redact the signature of Chris Murray.

Chris Murray
Head of Strategic Planning