



Date: 2 March 2018
Our ref : DP/saw
✉ Email address: chiefexecutive@hart.gov.uk
☎ Direct Dial No: 01252 774143

Hart District Council
Civic Offices
Harlington Way
Fleet
Hampshire
GU51 4AE

Telephone: 01252 622122
Fax: 01252 626886
DX: 32632 Fleet
www.hart.gov.uk

Mr Sadiq Khan (Mayor of London)
New London Plan
GLA City Hall
London Plan Team
Post Point 18
FREEPOST RTJC-XBZZ-GJKZ
London SE1 2AA

Dear Mayor of London

Hart District Council's Response to the London Plan Consultation Draft

Thank you for the opportunity to comment on the London Plan 2019-41. This letter is the Council's formal response.

Demonstration of meeting need within the London Boroughs

Hart District Council supports the Draft Plan's aim to accommodate all of London's growth within its own boundaries.

The Council acknowledges the Draft London Plan's recognition of migration trends into London from surrounding areas in the Wider South East. In relation to this, the Council supports Figure 2.13 of the Draft London Plan (Spatial Distribution of Commuting to London) which shows Hart as having a range of 2,700 – 6,100 persons commuting to London per day. This demonstrates a comparatively low number of commuters travelling to London from Hart in the context of the Wider South East, reflecting the findings of the Hart/Rushmoor/Surrey Heath 2016 Employment Land Review.

Hart District Council acknowledges the need for London to plan for longer term contingencies with regard to future growth, as outlined in Policy SD3 of the Draft London Plan - Growth locations in the Wider South East and beyond. This section of the Plan also indicates the Mayor's interest in working with willing partners beyond London to explore if there is potential to accommodate more growth in sustainable locations. However, the Council considers Hart is not a suitable or sustainable location for accommodating additional growth from London. The reasons for this are set out in the remainder of this letter.

Hart is subject to numerous environmental constraints and contains large areas of the Thames Basin Heaths Special Protection Area (TBH SPA), which covers approximately 23% of land within the District. This figure is not inclusive of the 400 metre buffer zone around the TBH SPA, within which residential development cannot be permitted. In addition, important



areas of the District are covered by areas identified as liable to flood, SSSI's and Historic Parks and Gardens which further hinder the areas ability to deliver housing. There are also large areas of MOD land. This will impact on Hart's ability to meet its own identified housing need and accordingly, will need to be given due consideration in the Mayor's determination of growth locations in the Wider South East.

The Draft London Plan emphasises that partnership working to deliver more homes in the Wider South East is focused on locations that are (or are planned to be) well-connected by public transport. The Council would like to emphasise the District's rail connections to London provide a secondary or local mainline service, with an average journey time of one hour from Farnborough to London Waterloo. The recent South Western Railway consultation confirms that there are no proposals to increase either capacity or frequency of trains to serve London from Hart.

Impact of proposed Strategic Infrastructure Priorities 2 and 10

Strategic Infrastructure Priority 2 – North Downs Rail Link

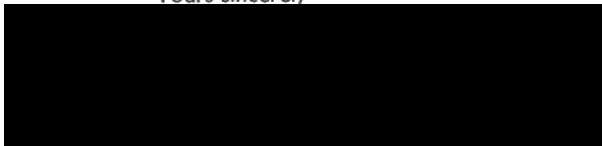
The Draft London Plan advises that, in addition to locations that are well connected by public transport, other areas of focus in the Wider South East include localities where development can help meet local growth aspirations as well as wider requirements.


As a result of limited land availability arising primarily from the TBH SPA constraint, it is not considered that Hart, or much of the wider Blackwater Valley area, would be able to accommodate additional growth arising from strategic Infrastructure Priority 2. This is because whilst the North Downs Line passes on the eastern side of Hart, there is only one small station located within the District. It, however, has only two short platforms, limited dropping off facilities, and no ticket or other service office.

Strategic Infrastructure Priority 10 - South West Mainline, Crossrail 2 South West (London - Surrey / Southern Rail Access to Heathrow) and A3

The Council wishes to emphasise there is a significant distance of approximately 40km between Crossrail 2 at Epsom, and the District of Hart. In addition, the A3 arterial road does not pass through the Hart area. Consequently, any additional capacity on these routes generated as a result of projects associated with Strategic Infrastructure Priority 10 will be highly unlikely to deliver significant benefits for Hart in respect of infrastructure, journey times, or development potential to meet local growth aspirations or wider requirements.

Yours sincerely



 Councillor Graham Cockarill
Portfolio Holder for Planning
Hart District Council