



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 2 March 2018

Dear Mr Khan,

Draft New London Plan (February 2018)

Horsham District Council welcomes the opportunity to comment on the Draft New London Plan.

We support the intention that the Plan period will last from 2019 to 2041 (22 years). We consider that this will enable the Mayor of London to take a long term, strategic view of development of London's development.

Policy H1 "Increasing Housing Supply"

We also support the view that housing targets (as set out in Policy H1) are set for 10 years (between 2019/20 and 2028/29). This approach complies with paragraph 14 of the NPPF, which states that "Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change".

Policy H1 – identifies a total housing need of 649,350 units in London between 2019/20 and 2028/29. The supporting text to Policy SD3 (para 2.3.1) states that the Plan accommodates all of London's growth without intruding on its Green Belt or protected open spaces. It notes that, as with any successful urban area this does not mean that in- and out- migration will cease but that as far as possible, sufficient provision will be made to accommodate the projected growth within London.

Horsham District Council supports the Draft London Plan's intention to accommodate the total housing need identified in Policy H1 within London's boundaries. Horsham District Council is planning to provide a total of 16,000 net new additional homes over its Plan period (2011-2031). This figure of 800 new homes per year includes an objectively assessed need of 650 homes per year plus a figure of 150 homes per year to meet the need arising from the wider housing market area (the housing market area includes Crawley and Mid Sussex and the 150 homes per year represents approximately half of the unmet need of Crawley). We welcome the intention that London will meet its own housing need, and will not require neighbouring authorities to meet an element of that need. We would urge the Mayor of London to ensure that the monitoring regime that is put in place to monitor housing delivery in London is robust, and that he is willing to take action, where required, to ensure that London

boroughs, and especially outer London boroughs, are delivering housing to accommodate London's identified housing needs.

Policy SD3 "Growth Locations in the Wider South East and Beyond"

Horsham District Council notes that Policy SD3 "Growth Locations in the Wider South East and Beyond" states that:

'The Mayor will work with relevant WSE partners, Government and other agencies to realise the potential of the wider city region and beyond through investment in strategic infrastructure to support housing and business development in growth locations to meet need and secure mutual benefits for London and relevant partners.'

It is not clear from the draft London Plan where the growth locations referred to above are actually located. Horsham District Council would welcome clarification of the Growth Location strategy, and further information on where it is intended that the Growth Locations will be.

Policy SD2 "Collaboration in the Wider South East"

This issue could be addressed through provision made in Policy SD2 "Collaboration in the Wider South East", which sets out the Mayor's intention to work with partners across the WSE. This cross-boundary work is intended to secure an effective and consistent strategic understanding of the demographic, economic, environmental and transport issues facing the WSE.

A key issue for the WSE authorities is the pattern of commuting to London for work. Figure 2.13 of the draft Plan identifies the Spatial Distribution of Commuting to London. Based on 2011 census data, Figure 2.13 notes that between 2,700 and 6,100 people commute from Horsham into the capital for work.

This commuting figure is 7 years out of date. We would ask that further work is undertaken by the Mayor to ensure that this key element of commuting from the wider south east to the capital is based on data that is as up to date as possible. This would then enable the current level of in-commuting to London to be properly understood. It would also allow decisions on investment into the strategic rail network to be based on accurate, up-to-date information.

Horsham District Council looks forward to working with the Greater London Authority on future strategic, cross-boundary issues.

Yours sincerely,

Councillor Claire Vickers
Cabinet Member for Planning and Development