

Contact:

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Your Ref:

Our Ref: AMN/LM

Date:

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LondonPlan@london.gov.uk

BY EMAIL ONLY

Dear Sir,

Mid Sussex District Council response to Draft London Plan consultation

Mid Sussex District Council welcomes the opportunity to comment on the draft London Plan. We support the intention that the Plan period will be from 2019 to 2041. This time period will enable a long term, strategic view of London's development to be taken.

However, we recognise that it is appropriate that the housing targets are only set for ten years, as 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.

MSDC supports the policy intent in the Plan to accommodate the total housing need identified in Policy H1 within London's boundaries. Mid Sussex is making provision to meet its objectively assessed housing need of 14,892 dwellings in full, as well as making provision to accommodate 1,498 units unmet housing need from the Northern West Sussex Housing Market Area. 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.

However, it is noted 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. MSDC would welcome clarification of the Growth Location strategy, and further information on where it is intended that the Growth Locations will be.

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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 6,100 and 10,300 people commute from Mid Sussex into the capital for work.

MSDC suggests that the number of people who commute to London for work could have increased significantly since 2011 and requests that further work is undertaken to provide more up to date information to inform this Plan. It is important that the current level of commuting is properly understood, and is used to inform work streams such as ensuring that the strategic rail service is properly funded to enable an efficient, resourced service is provided to enable this level of commuting to be maintained.

Figure 2.15 of the Plan identifies 13 WSE strategic infrastructure priorities; the M23 motorway and A23 is identified as one of these priorities in the Plan.

Policy T3 – Transport capacity, connectivity and safeguarding – states that:

‘Development Plans should develop effective transport policies and projects to support the sustainable development of London and the Wider South East, as well as to support better national and international public transport connections.’

Mid Sussex District Council is working with a range of organisations such as West Sussex County Council, Highways England and the other local authorities to agree and deliver highways improvements on the M23 and the A23 and would be happy to engage with the Greater London Authority, to support sustainable development in London, Mid Sussex and the Wider South East.

MSDC looks forward to working with the Greater London Authority on strategic, cross boundary issues.

Yours sincerely

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Councillor Andrew MacNaughton
Cabinet Member for Housing and Planning