

Reigate and Banstead Borough Council

Observations on the New London Plan.

Consultation Draft – December 2017

Thank you for the opportunity given to Reigate and Banstead Borough Council to comment on the New London Plan consultation draft December 2017.

Reigate and Banstead Borough Council supports the representations on the New London Plan consultation made to the Mayor of London on behalf of:

- Gatwick Diamond Group of Authorities
- Surrey Planning Officers' Association

In addition the following detailed comments and objections are raised on behalf of the Reigate and Banstead Borough Council.

Good Growth

Reigate and Banstead Borough Council supports Good Growth objectives and specifically around policy GG1 - Building strong and inclusive communities. Parts of the Borough are physically close to adjacent areas in London (in particular Croydon and Sutton Boroughs), and there is a close interrelationship and interaction in terms of shared use of schools, community facilities, shops, jobs etc.

The council would wish this to be taken into account in the participatory arrangements referred to in this chapter.

In particular with proposals coming forward e.g. tram networks and major developments such as the London Cancer Hub the views and needs of adjacent areas close to the borough boundary should count with full public participation and scrutiny of planning decisions and engagement from the early stages through to implementation and monitoring.

Policy GG2 - Making the Best Use of Land - is generally supported in particular with reference to co-ordination with areas beyond the borough boundary. Recognition and support for a more sustainable pattern of development and a greater recognition of a more polycentric geography for London is welcomed as a policy which has been tried and worked in London before (GLDP) but has been neglected more recently to the disadvantage of areas in outer London. Residents from Banstead and other northern areas of the borough to make use such areas for work, shopping etc. and Good Growth, that achieves a reduction in the distances travelled and in the need for travel, is welcomed as also meeting environmental objectives.

Good Growth is of benefit to the wider area. The council supports the proposition that the cost and environmental impact of unnecessary extra travel across the London boundary, created by a failure of London's housing policies and the provision of sufficient housing of the right type and affordability within London is Bad growth. This adversely affects the people and the environment of Reigate and Banstead Borough.

Policy GG3: Creating a Healthy City is supported. The Reigate and Banstead area is partially provided for in terms of critical care and emergency services from locations within Greater London. The council supports GG4 - Delivering the homes Londoners need - including the delivery within London of not-for-profit rented homes, social rented and community-led housing, particularly on land owned by the GLA Group and Local Authorities

The council welcomes the Collaborative approach in developing the Wider Southeast referred to in SD2, 3, 4 and the details on growth corridors and strategic infrastructure priorities. These are matters which affect the Borough and are addressed in the responses referred to at the beginning of this commentary by the Gatwick Diamond Authorities and Surrey Planners.

At the Borough level there are particular challenges and a need for ongoing collaboration between Boroughs and Districts in the adjacent metropolitan green belt with the corresponding outer London boroughs. The New London Plan should recognise this explicitly.

The emphasis on achieving additional housing in opportunity areas is questioned in relation to delivery. There are significant issues involved in these areas. When taken with the densification emphasis there is doubt on the ability to deliver particularly in the early stage of the Plan. This could perpetuate and exacerbate migration flows from London to areas such as Reigate and Banstead leading to higher land values and house prices and pressure on specific types of housing in high demand and short supply such as housing and family housing.

The council welcomes the Mayor's policies on greater scrutiny and challenge on viability study evidence. This will assist the transformation of the housebuilding industry and the housing land market and is therefore of direct benefit also to areas outside of London.

Design

The council notes the new London Plan emphasis on design lead densification. Whilst this is a matter for within London the council considers that these are relatively untried and tested approach at a strategic level and that an increase in housing to better meet London's needs is not assured. In practice will higher density housing be less attractive for families leading to an increase in the pressure for delivery of such housing in adjacent areas such as Reigate and Banstead Borough.

The monitoring and contingency aspects of this need to be clear and to involve authorities in the wider south east down to Borough level and in particular recognise the particular pressures of authorities adjacent to the London Boundary. Moreover in practice design skills are a scarce resource and the prospect of unpopular and badly designed higher density housing in the areas close to the borough boundary will again lead to increased pressure within the adjacent areas beyond the London area and into the metropolitan green belt and the communities of Reigate and Banstead Borough.

Housing

The council notes that there are practical difficulties associated with increasing housing supply and the reliance on small sites. This is referred to in the responses mentioned at the beginning of this representation.

It is of concern and the council draws attention to informed expert concern that the estimate derived from the Strategic Land Availability Assessment (SHLAA) that London has a capacity for 65,000 new homes a year for the 10-year plan period is based on assumptions for increased development densities which are higher than those consistent with pre-existing plan policy on sustainable residential quality and will not provide for the range of building types and bedroom size mixes needed to meet the housing requirements assessed in the SHMA.

There is concern that development at the assumed densities will not provide sufficient family size homes. There are also doubts on the net housing yield from “estate regeneration”, a process which the London Assembly has shown to have reduced the stock of social housing over the last decade. There is a heavy reliance on small sites. This has much to commend it but would tend to produce only or mainly dwellings for the open market and thus not help meet the backlog of need nor the top priority current needs. The New London Plan should impose a requirement for social housing contributions from small-site schemes.

London Boroughs are encouraged to support development on small sites, with presumption in favour of the development, and are given a target for small sites of about one third of their overall housing target. Small sites are more likely to deliver market housing; affordable housing “should only be required through off-site contributions” (H2 H) and boroughs “should be capable of securing cash in lieu” (4.2.12). They could contribute social rented housing elsewhere, but this is much harder to monitor and will inevitably be low in number.

It is noted that the risk of failure of these policies increases the potential for housing need displaced from London. This would have potential adverse impacts on areas such as Reigate and Banstead Borough. This is a risk that Good Growth will not be deliverable

The council would welcome cross boundary discussions over H16 Gypsies and Travellers as there are shared issues in relation to need and provision.

Infrastructure, Growth and the Natural Environment

The council recognises the importance of the metropolitan green belt and metropolitan open land in London. 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. NPPF draft revisions set a high bar and additional justifications needed before Green Belt land is released. These include demonstrating that best use is made of

brownfield land and other land within the urban envelope including promoting good design to create new living environments which will meet the needs of future generations. These are supported by the council. At a local level, and entirely consistent with Green Belt purposes, there are circumstances where revisions to the Green Belt are justified and the Borough Council considers that the same standards and criteria should be applied to the Metropolitan Green Belt irrespective of whether this is one side of the London administrative boundary or the other side.

Outside of London, 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 in many parts of the Metropolitan Green Belt, for example the Reigate and Banstead Core Strategy 2014. 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 Council is happy to assist the adjacent London Boroughs with an appropriate collaborative joint review.

The Council welcomes the recognition of the interrelationships between London and the wider south east and especially that the London/Gatwick/Brighton corridor and the North Downs line orbital route are key investment priorities. There are also important physical and environmental relationships in this corridor. We consider these to be priorities.

The Reigate and Banstead Core Strategy and draft Development Management Plan include some ambitious growth proposals along the London/Gatwick/Brighton corridor. The council welcomes the commitment for future constructive joint working to ensure that our respective growth proposals are complementary and that the appropriate infrastructure investment needed to meet the needs of our own and London residents in these corridors is secured.

The original purposes of the Green Belt remain relevant and the council is keen to see these reflected in its own Local Plan and the statutory plans of adjacent council's including in the London Plan: in particular to continue to check the unrestricted sprawl of large built-up areas and to prevent neighbouring towns merging into one another. The identity and characteristics of individual settlements should be maintained at the same time as the promotion of Good Growth in London and to take equal effect in the areas beyond London such as Reigate and Banstead Borough.

There is concern that the promotion of London/Gatwick/Brighton growth corridor will be realised as a stretch of continuous urban development from Greater London to the South Coast. The council is determined to maintain strategic open gaps between adjacent towns and to commend this approach to other. The maintenance of the Metropolitan Green Belt is an important part of this wider spatial strategy shared between London and the wider south east. There are severe pressures for unregulated development and in this respect it is noted that the Mayor is expressing support for the expansion of Gatwick. The council is less convinced that there are such overwhelming advantages and certainly not without proper planning, infrastructure provision and environmental protection including the maintenance of Green Gaps.

These should be achieved in collaboration and in this regard the council welcomes the switch in emphasis in the NLP towards "willing partners". Specifically the commitment to

additional infrastructure investment in strategic infrastructure investment locations should not be regarded by the Mayor as an automatic trigger for growth opportunity areas in the wider south east, including imposing requirements to meet London's unmet housing need: unless this has been discussed and agreed with the respective councils at district and county level.

The wider south east and particularly adjacent areas such as Reigate and Banstead are popular with Londoners seeking areas for recreation and leisure and the enjoyment of the countryside and this should continue to be accessible to people irrespective of home location.

Recognition of the spatial role of London in terms of physical development in the wider south east is welcomed. This should include recognition of interrelationships with the wider south east in terms of Green Infrastructure and Natural Environment as set out in chapter 8. This to be identified and highlighted as well as the Strategic Infrastructure Priority (Figure 2.15 (9)) which refers to the London-Gatwick- Brighton corridor.

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