# **Planning**

**HEAD OF SERVICE: ADRIAN DUFFIELD** 





Listening Learning Leading

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Sadiq Khan (Mayor of London)
New London Plan
GLA City Hall
London Plan Team
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By email: londonplan@london.gov.uk

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Dear Sadiq Khan,

## **Draft New London Plan**

Thank you for providing South Oxfordshire and Vale of White Horse District Councils (South and Vale) with the opportunity to comment on the Draft New London Plan. South and Vale wish to make the following comments:

# Collaboration in the Wider South-East Region

South and Vale form part of the Oxfordshire housing market area, which is situated within the wider south-east region. The important, complex relationship between London and the wider south-east is recognised throughout the Draft New London Plan and this is welcomed. It is positive that the Draft New London Plan sets out the Greater London Authority's (GLA) commitment to collaboration with partners in the wider south-east. South and Vale welcome the opportunity to engage with the GLA on matters of strategic importance through the duty to cooperate.

## **Strategic Transport Infrastructure**

There are clear links throughout the Draft New London Plan between strategic infrastructure delivery and growth. The Draft New London Plan identifies a number of initial strategic infrastructure priorities. Of particular relevance to South and Vale are the proposed Oxford to Cambridge Expressway, improvements to the Great Western Mainline (including electrification) and the proposed North Down Rail link (Gatwick to Reading, with an extension to Oxford). South and Vale are already engaging with relevant authorities and partners in the development of these schemes and will continue to do so as these schemes progress.

#### Housing

South and Vale support the Draft New London Plan's approach to accommodate all of London's growth within its boundaries and this is welcomed.

In September 2017 the Government consulted on a proposed standardised methodology for assessing housing need. The indicative assessment of housing need published alongside the consultation document suggests an annual housing





requirement for London of around 72,000 dwellings per annum<sup>1</sup>. This is significantly greater than the 66,000 dwellings set out in the Draft New London Plan and no reference is made to how the shortfall will be addressed.

Should Government seek to introduce a standardised methodology for housing in 2018, then there is a risk that additional land would be required to meet the c.6,000 dwelling annual shortfall. If sufficient land is not available to meet a higher housing target, there may be a need for the GLA to consider undertaking a strategic Green Belt review and to work with neighbouring authorities through the duty to cooperate in order to ensure that housing need can continue to be met on land which is demonstrably close to and accessible to London.

The London Strategic Housing Market assessment (2017) indicates a need for 65% of new homes to be delivered as affordable housing (either low cost rent or intermediate tenures). It is unclear how the Draft New London Plan will achieve the required levels of affordable housing delivery. The strategic target is for 50% of all new homes delivered across London to be affordable, but the proposed threshold approach to viability allows 35% affordable housing on the majority of sites. If London is unable to address its affordable housing requirements, this will increase pressure on the wider region to deliver some of this need.

South and Vale, in partnership with the other Oxfordshire authorities, are already working to accelerate housing growth within the Oxfordshire housing market area. This includes boosting the provision of affordable housing, as Oxfordshire suffers from some of the highest income to house price ratios in the UK. Authorities in Oxfordshire are seeking to deliver growth at a rate not previously seen in these districts. The Oxfordshire authorities are committing to delivering 100,000 new homes through the Oxfordshire Growth Deal with Government.

Yours sincerely

Rebekah Knight Senior Planning Policy Officer South Oxfordshire District Council Ronan Leydon Senior Planning Policy Officer Vale of White Horse District Council

<sup>&</sup>lt;sup>1</sup> Planning for the right homes in the right places: consultation proposals. DCLG, September 2017. Paragraph 26