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Dear Mr Mayor

The Draft London Plan December 2017 - Comments from Surrey County Council

We welcome the opportunity to comment on this Consultation Draft of the London Plan. Like other areas adjacent to London, Surrey has significant links to the capital in terms of commuting, housing markets, infrastructure, waste management and the interdependencies of our economies. London's influence and future development are critical for the county, where considerable pressure for new housing and supporting infrastructure continues to come from migration from London. The following officer comments have been agreed by the County Council's Cabinet Member for Environment and Planning.

We support the inclusion of 'Good Growth' policies, the aim of meeting the vast majority of London's anticipated housing needs within the capital and your commitment to work collaboratively with local authorities in the Wider South East (WSE) on shared strategic concerns, especially barriers to housing and infrastructure delivery and factors that influence economic prosperity. We also welcome the affordable housing thresholds being sought in the Plan to address the high cost of housing which contributes to out-migration from London to surrounding areas. However, we have a number of concerns as set out below.

Housing and infrastructure delivery and collaboration with the Wider South East

The Plan recognises that the delivery of housing will be challenging and relies on significant development occurring in the identified Opportunity Areas (OAs) and substantially increasing the output from small housing developments. The delivery of many of the OAs is, in turn, dependent on the timely delivery of key strategic transport infrastructure along identified growth corridors within London. The Plan's focus on intensification will require investment in new and improved transport and enabling infrastructure more generally. Accordingly, the

Plan needs to be clear about the mechanisms for ensuring that the necessary infrastructure is secured in practice.

In addition, we are concerned that the Plan only makes provision for the delivery of around 65,000 additional homes a year to 2028/29 against an assessed housing need of about 66,000 homes a year with no demonstrable strategy to meet the shortfall. The emphasis on higher density development and smaller units could have implications for Surrey since previous under-delivery in London and lack of affordable family units has added to housing pressures in Surrey districts and boroughs with associated implications for infrastructure in the county.

The London Plan should therefore be accompanied by both a **robust monitoring framework** and a **risk management plan** that should be developed with WSE partners. These would inform partnership working between London and the WSE on strategic concerns such as barriers to housing and infrastructure delivery (Policy SD2 E) and with willing partners to identify growth locations as longer term contingencies to accommodate growth (Policy SD3).

In terms of risk management, specific agreements could be developed with groups of authorities in London and authorities in Surrey, particularly for some of the proposed OAs close to London's boundary which are likely to have significant implications for adjoining areas in Surrey, most notably the Kingston OA. Such agreements could give greater confidence in joint action, for example to ensure that sufficient capacity can be delivered on cross border transport and enabling infrastructure which would be of mutual benefit.

Policy SD1 should recognise the potential cross-border impacts of the OAs and the need for the Mayor's agencies and London boroughs to engage on these matters with relevant local authorities outside London, including county councils as key infrastructure providers, to deliver sustainable growth.

To support the implementation of Policy SD3, there is also a need for guidance that sets out how the Mayor will collaborate with willing partners on sustainable growth locations which will meet local as well as wider growth requirements and help deliver strategic infrastructure. An active approach to find willing partners should be promoted in order to secure these mutual benefits and avoid additional pressure on local plans in areas with significant constraints to allow for the effect of migration arising from London's unmet housing needs. Much of Surrey is subject to environmental constraints such as Areas of Outstanding Natural Beauty, Special Protection Areas and flood risk as well as Green Belt constraints that restrict the ability of the districts and boroughs to accommodate their own housing needs let alone London's unmet needs as set out in the Interim Surrey Local Strategic Statement 2016 – 2031.

The supporting text to Policy SD3 needs to make it clear that the 13 WSE strategic infrastructure priorities agreed by the GLA and South East England and East of England councils as being in need of investment now to address current congestion and capacity issues are not being proposed as growth corridors. There should not be any suggestion that there are potential opportunities in Surrey along the strategic infrastructure priorities indicated as continuing outwards from London's growth corridors to meet London's unmet needs.

The Plan's approach of developing on brownfield land first is supported and the 10 year housing targets for 2019/20 – 2028/29 (Policy H1) have been set on the basis that they can be achieved without intruding on its Green Belt. Policy G2 does not support de-designation of Green Belt in London although the supporting text at paragraph 8.2.1 highlights that the processes and considerations for defining Green Belt boundaries are set out in the NPPF.

We support continued protection of the Green Belt, however most Surrey boroughs and districts are having to assess and review Green Belt boundaries as part of work to examine the extent to which emerging local plans can meet identified objectively assessed needs in a sustainable way that is consistent with the policies of the National Planning Policy Framework, including the long term protection of the Green Belt. We therefore consider it important that London boroughs should be able to undertake alterations to the Green Belt boundary in their own areas where there is evidence to demonstrate that there are exceptional circumstances, including meeting housing needs.

This is especially relevant, because under national policy local plans would normally be expected to set policies for a 15 year period that extends beyond the Plan's 10 year housing targets. It is noted that in the current London Plan, there is a commitment to revising the targets for 2015-2025 by 2019/20 and advice to the boroughs that they should roll forward these targets for any intervening period. There should be a similar commitment in this Plan to review the targets and advice to roll forward the annual targets for 2019/20 – 2028/29 for any intervening period in order to provide guidance for local plans.

Waste

We support Policy E4 which prioritises the retention and provision of additional industrial capacity in locations that provide capacity to support London's economy and population including waste management.

Although we support the general approach to reducing waste and supporting the circular economy set out in Policy S17, we do have concerns about the policy's effectiveness and suggest that the Plan should:

- Set clear definitions for the term 'circular economy' and related terms ('circular economy principles' and 'highest use').
- Make it clear how 'a more circular economy' would be promoted.
- Consider whether the recycling target of 95% by 2020 for construction, demolition and excavation waste is meaningful for a Plan that is not due to be adopted until 2019 and so there would be little time for the policy to take effect (although we support the ambition of this target).

We support the principle of requiring Circular Economy Statements to be submitted with referable applications. The information in these statements should be available to those local authorities, including those outside London, receiving the waste and the Plan should indicate how this will be achieved in order to 'help receiving authorities plan for future needs' (para 9.7.5). The supporting text also sets out that 'where it is intended to export waste to landfill outside of London, it will be important to show that the receiving authority has the capacity to deal with waste over the lifetime of the development'. It is important to clarify that "lifetime of the development" includes both the construction and operational phases of the development. Furthermore, to meet this requirement, it is recognised that developers may ask the receiving authority for details of their capacity but it is also important that the receiving waste authority is provided with information from the developer as to the amount of waste they can expect to receive. Further guidance on Circular Economy Statements (para 9.7.6) should address these issues and cover both the construction and operational phases of development.

We support the Plan's target for net self-sufficiency by 2026 (Policy S18) and the commitments in paras 9.8.2 and 9.8.3. However it is unclear what volumes and types of waste London expects to import/export as part of the 'exchange' of waste between areas within and beyond London. This information is necessary in order to measure and monitor whether the target is being met and the required waste management facilities are available. Part B 3a of Policy 18 should be reworded to make it clear that it is recycling and recovery capacity at existing sites that should be optimised.

There is extreme pressure on development land in London and if net self-sufficiency is to be achieved, waste sites should not be redeveloped for non-waste uses other than in exceptional circumstances and when compensatory capacity can be provided. Therefore, the county council strongly supports the approach to the safeguarding of waste sites (Policy S19). However, we are concerned that compensatory capacity will be calculated using the maximum throughput achieved over the last 3 years, and this could mean that no compensatory capacity is required if a site has been dormant. Compensatory capacity should equate to the maximum design capacity of a facility or maximum capacity achieved over the life of a facility. Policy S19 should make clear that transfer capacity cannot compensate for treatment capacity.

We strongly support the safeguarding of wharves and/or railheads as set out in Policy S110.

Flood risk management

We welcome the statement in Policy S112 that London boroughs should co-operate and jointly address cross-boundary flood risk issues with authorities outside London as well as within London.

Transport

We support the inclusion of Crossrail 2, Brighton Mainline Upgrade, Southern Rail Access to Heathrow and the tram extension to Sutton in the list of proposed transport schemes in Table 10.1. Crossrail 2 will lead to increased capacity and improved connectivity that will help to tackle existing congestion problems and support development in key locations and help local planning authorities in Surrey accommodate their own local growth needs for housing and economic development including in mixed developments. Extending the tram service to Sutton could promote modal shift and minimise the impact of increased car journeys on roads in the area, including in East Surrey, especially if the London Cancer Hub proposals are developed. We would also like to see the Plan recognise the importance of cross boundary bus services between Outer London and the WSE. There could be some potential for cross boundary demand-responsive bus services between Outer London and Surrey.

In relation to aviation (Policy T8), we support the aims of increasing the proportion of journeys passengers and staff make by sustainable means and minimising the environmental impacts of airport servicing and airport-related freight movements. However, given these aims and the desire in Part 6 of the policy for improved rail links to make better use of existing airport capacity, we consider that the Plan should recognise that Southern Rail Access is not just required for Heathrow's expansion but is needed to meet demand arising from the existing two-runway airport. There needs to be agreement on the most appropriate Southern Rail Access scheme to deliver stakeholders' requirements. Brighton Mainline Upgrade will help cater for increasing numbers of airport passengers at Gatwick and encourage modal shift.

We agree that airport expansion should aim to reduce public exposure to harmful levels of air and noise pollution.

I hope these comments are helpful. If you require further information please contact Sue Janota by email at sue.janota@surreycc.gov.uk, or by phone on 0208 541 7593.

Yours sincerely



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