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Sadiq Khan (Mayor of London)
New London Plan
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6th February 2018

Dear Mayor of London

Surrey Heath Borough Council's Response to the London Plan Consultation Draft

Thank you for the opportunity to comment on the London Plan 2019-41. This letter is the Council's formal response.

Demonstration of meeting need within the London Boroughs

Surrey Heath Borough Council supports the Draft Plan's aim to accommodate all of London's growth within its own boundaries.

The Council acknowledges the Draft London Plan's recognition of migration trends into London from surrounding areas in the Wider South East. In relation to this, the Council supports Figure 2.13 of the Draft London Plan (Spatial Distribution of Commuting to London) which shows Surrey Heath as having a range of 2,700 – 6,100 persons commuting to London per day. This demonstrates a comparatively low number of commuters travelling to London from Surrey Heath in the context of the Wider South East, and the lowest number in the county of Surrey, reflecting the findings of the Hart/Rushmoor/Surrey Heath 2016 Employment Land Review.

Surrey Heath Borough Council acknowledges the need for London to plan for longer term contingencies with regard to future growth, as outlined in Policy SD3 of the Draft London Plan - *Growth locations in the Wider South East and beyond*. This section of the Plan also indicates the Mayor's interest in working with willing partners beyond London to explore if there is potential to accommodate more growth in sustainable locations. However, the Council considers Surrey Heath is not a suitable or sustainable location for accommodating additional growth from London. The reasons for this are set out in the remainder of this letter.

Surrey Heath is subject to numerous environmental constraints and contains large areas of the Thames Basin Heaths Special Protection Area (TBH SPA), which covers approximately 23% of land within the Borough. This figure is not inclusive of the 400 metre buffer zone around the TBH SPA, within which residential development cannot be permitted. In addition, the rest of the Borough is entirely within 5km of this designated area, which further impacts the Council's ability to deliver housing. There are also large areas of MOD land and the majority of the

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eastern half of the Borough is designated Metropolitan Green Belt. This will impact on Surrey Heath's ability to meet its own identified housing need and accordingly, will need to be given due consideration in the Mayor's determination of growth locations in the Wider South East.

The Draft London Plan emphasises that partnership working to deliver more homes in the Wider South East is focused on locations that are (or are planned to be) well-connected by public transport. The Council would like to emphasise the Borough's rail connections to London provide a non-mainline service, with an average journey time of 1 hour 17 minutes from Camberley to London Waterloo. There are currently proposals to reduce the length of this journey to approximately 1 hour 7 minutes. However there will be no direct services from any of the three stations located in Surrey Heath (Camberley, Frimley and Bagshot) to London.

Impact of proposed Strategic Infrastructure Priorities 2 and 10

Strategic Infrastructure Priority 2 – North Downs Rail Link

The North Downs Line passes to the west of Surrey Heath, and does not have a station located within the Borough. The Draft London Plan advises that, in addition to locations that are well-connected by public transport, other areas of focus in the Wider South East include localities where development can help meet local growth aspirations as well as wider requirements. As a result of limited land availability arising primarily from the TBH SPA constraint, it is not considered that Surrey Heath, or much of the wider Blackwater Valley area would be able to accommodate additional growth arising from strategic Infrastructure Priority 2. Furthermore, the Council is currently undertaking capacity related work to demonstrate whether its own housing needs can be accommodated within the Borough. This work is indicating that Surrey Heath will be unable to meet its housing need and as a consequence, will need to work with its Housing Market Area partners to address this. For these reasons, it is not considered that Surrey Heath is a suitable growth location for additional development to support wider growth requirements.

Strategic Infrastructure Priority 10 - South West Mainline, Crossrail 2 South West (London - Surrey / Southern Rail Access to Heathrow) and A3

The Council wishes to emphasise there is a significant distance of approximately 33km between Crossrail 2 at Epsom, and the Borough of Surrey Heath. In addition, there is no station on the South West Mainline located within Surrey Heath, and the A3 arterial road does not pass through the Surrey Heath area. Consequently, any additional capacity on these routes generated as a result of projects associated with Strategic Infrastructure Priority 10 will be highly unlikely to deliver significant benefits for Surrey Heath in respect of infrastructure, journey times, or development potential to meet local growth aspirations or wider requirements.

Yours sincerely

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Surrey Heath Borough Council

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