

## Surrey Planning Officers' Association

Sadiq Khan, Mayor of London  
New London Plan  
GLA City Hall  
London Plan Team  
London SE1 2AA

Emailed to: [LondonPlan@london.gov.uk](mailto:LondonPlan@london.gov.uk)

Dear Mr Mayor

I am writing on behalf of the Surrey Planning Officers' Association in response to your consultation on the Draft London Plan. The comments below reflect the collective professional views of the heads of planning of the Surrey local authorities but not necessarily the formal view of those authorities, which may submit separate representations to this consultation.

We welcome this opportunity to comment on the Draft Plan because it will impact directly on local plans and local plan reviews that we are currently working on in Surrey. Like other areas adjacent to London, Surrey has significant links to the capital in terms of commuting and infrastructure and the interdependencies of our economies and London's influence and future development are critical for the county.

We support the Plan's 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, particularly on 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 leads to out-migration from London to surrounding areas. However, we have a number of concerns as set out below.

### **Accommodating housing needs and collaboration with the Wider South East**

The Draft 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 such 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 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 our areas.

To address concerns over housing and infrastructure delivery, 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 arrangements with groups of authorities in London and authorities in Surrey should be explored, particularly for some of the proposed OAs close to London's boundary which will have implications for Surrey. This is especially important as regards cross border transport and enabling infrastructure where ensuring that sufficient capacity can be delivered would be of mutual benefit, for example improvements to the A3 Junction at Hook that would support delivery of the Kingston OA.

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 should be promoted in order to secure these mutual benefits and to 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 our ability to accommodate our 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 Draft 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 Green Belt. Policy G2 B 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 NPPF, including the long term protection of the Green Belt. If the consequence of London boroughs not being able to undertake alterations to the Green Belt to allow for development is that they cannot meet their housing needs, then this could put pressure on surrounding districts in the WSE that are also constrained and also struggling to meet housing needs, particularly where a SHMA includes a London borough. Surrey authorities do not want to be in a position where they are having to release Green Belt land in their areas because a London borough in their SHMA is not releasing Green Belt land. Moreover, there could be added pressure to accommodate growth further afield in districts that include areas beyond the Green Belt in less sustainable locations to accommodate London's needs. 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 also relevant, because under national policy local plans would normally be expected to set policies for a 15 year period that extends beyond the Draft Plan's 10 year housing targets. It is noted that in the existing 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 in 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. However, we consider that the Draft 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 as set out by the Airports Commission and to help deliver Policy T8 G.

Yours sincerely

**Elizabeth Sims**

Chair, Surrey Planning Officers Association