



Waverley Borough Council
Council Offices, The Bury's,
Godalming, Surrey
GU7 1HR
www.waverley.gov.uk

Graham Parrott

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

Planning Policy Manager

Planning Services

E-mail: graham.parrott@waverley.gov.uk

Direct line: 01483 523472

Calls may be recorded for training or monitoring

Your ref:

Our ref:

Date: 1st March 2018

Dear Mayor

Consultation on the Draft London Plan

I am writing on behalf of Waverley Borough Council in response to the consultation on the Draft London Plan.

Waverley Borough Council welcomes the opportunity to comment on the Draft Plan, given the potential impact on the wider South East, including Waverley Borough. Surrey as a whole has significant links to London in terms of commuting and infrastructure and the interdependencies of our economies.

Whilst there are a number of elements of the Plan that will impact on Surrey and Waverley, this response focusses on two inter-linked issues: Housing and Green Belt.

Housing

Waverley Borough Council welcomes the aim in the Plan of meeting the 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.

- The Council is concerned that the delivery of new housing relies heavily on significant development taking place in the identified Opportunity Areas (OAs). 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 needs to be clear about the delivery of housing and the mechanisms needed to ensure the timely delivery of infrastructure. This should include considering contingencies in the event that new housing is not delivered.
- The Council is also concerned that the Plan only makes provision for the delivery of around 65,000 additional homes a year against an assessed need of about 66,000, with no demonstrable strategy to meet the shortfall. Moreover, 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. It is also noted that the housing targets for the London Boroughs are only for 10 years.

The Council's concern is that any potential under-provision of housing within London will inevitably put more pressure on districts and boroughs in the WSE, including Waverley, to accommodate additional housing.

It is noted that through Policy SD3, you propose to work with relevant partners in the WSE to realise the potential of the wider city region and beyond through investment in strategic infrastructure to support housing and business development in growth locations. Whilst this is noted, it should be pointed out that much of Surrey, including Waverley Borough, 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.

Green Belt

It is noted that you strongly support the continued protection of London's Green Belt and that draft Policy G2 does not support de-designation of Green Belt in London. Waverley supports the continued protection of the Green Belt in principle. However, most Surrey boroughs and districts are or have had 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. In Waverley's case this has resulted in some localised Green Belt releases to help to meet housing needs.

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. 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. Waverley Borough Council therefore considers 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.

I trust you will take these comments into account.

Yours sincerely

Graham Parrott
Planning Policy Manager