### WIDER SOUTH EAST POLITICAL STEERING GROUP

# 21 MARCH 2018 AT 13:00 - 15:00 AT CITY HALL, LONDON

#### AGENDA

1.	Welcome, Introductions and Apologies	13:00
	Chair: Jules Pipe, Deputy Mayor, Planning, Regeneration and Skills	
2.	Minutes of last meeting on 21 July 2017	13:05
3.	Summit Evaluation and WSE PSG priorities for 2018	13:10
	Nick Woolfenden, South East England Councils	
4.	Next Steps for the new London Plan	13:25
	Jorn Peters, Greater London Authority	
5.	Joint Infrastructure Priorities	13.45
	Hannah Shah, East of England LGA	
	Engaging with the Sub-National Transport Bodies	
	<ul> <li>England's Economic Heartland – Cllr James Jamieson</li> </ul>	
	Transport East - Cllr Linda Haysey	
	Transport for the South East – Cllr Tony Page	
6.	Tackling Housing Barriers	14.35
	Nick Woolfenden, South East England Councils	
7.	Actions/next steps, and future meetings	14.50
	• WSE PSG - 10 October 2018 at 14:00 – 16:00 at City Hall, London	
	• WSE Joint Summit – 12 December 2018 at 11:00 – 14:00 at City Hall, London	
8.	Meeting close	15.00

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# ITEM 2. MINUTES OF THE WSE POLITICAL STEERING GROUP MEETING ON 21 JULY 2018

# WIDER SOUTH EAST POLITICAL STEERING GROUP 21 JULY 2017 AT 14:00 – 16:00 AT CITY HALL, LONDON

#### **Meeting Notes**

#### Attendance

Cllr David Finch	Essex County Council	East of England
Cllr Robin Howe	Huntingdonshire District Council	East of England
Cllr Roy Davis	Luton Borough Council	East of England
Cllr Aidan Van De Weyer	South Cambridgeshire District Council	East of England
Cllr James Jamieson	Central Bedfordshire Council	East of England
Deputy Mayor Jules Pipe	Greater London Authority	London
Cllr Kevin Davis	Royal Borough of Kingston upon Thames	London
Cllr Stephen Alambritis	London Borough of Merton	London
Cllr Nicholas Heslop	Tonbridge & Malling Borough Council	South East
Cllr Carole Paternoster	Aylesbury Vale District Council	South East
Cllr John Furey	Surrey County Council	South East
Cllr Paul Bettison	Bracknell Forest Council	South East
Cllr Tony Page	Reading Borough Council	South East

Cinar Altun	East of England LGA	East of England
Cecilia Tredget	East of England LGA	East of England
Richard Hatter	Thurrock Council	East of England
Jennifer Peters	Greater London Authority	London
Jorn Peters	Greater London Authority	London
Fiona Fletcher Smith	Greater London Authority	London
Jennifer Sibley	London Councils	London
Mike Keegan	Transport for London	London
Nick Woolfenden	South East England Councils	South East

### 1. Welcome and apologies

1.1. Cllr David Finch, Leader of Essex County Council and Chairman of the East of England Infrastructure and Growth Group welcomed colleagues. He explained the PSG scheduled for 29 September was brought forward to today, to allow discussion of emerging London Plan policies prior to consultation.

### 2. Notes of the last meeting – 31 March 2017

- 2.1. Notes of the previous meeting held on 31 March 2017 were approved as accurate.
- 2.2. With respect to Action 9.2 relating to water provision, Jorn Peters advised that there is existing technical work on water supply across the WSE underway and will conclude later this year; however, opportunities for strategic collaboration on waste management were discussed instead as a potential new work stream at the WSE Officer Working Group in June.

# 3. Update on the London Plan – WSE Policies

- 3.1. Jorn Peters, from the GLA's London Plan team presented this paper. Based on discussions with WSE members and officers, GLA indicated they would place a clearer focus on willing partners, who might consider accommodating growth beyond their local need. The PSG's WSE orbital as well as radial infrastructure corridors would be reflected equally. The Plan would make clear collaboration is not aimed solely at housing but also at other strategic matters such as economic development. The GLA has begun to have initial conversations to this effect.
- 3.2. Members of the WSE Political Steering Group welcomed the GLA's approach and provided further feedback on the emerging WSE Policies in the London Plan:
  - Although there are some concerns remaining with respect to the policy summaries provided in the report, members welcomed the GLA's direction of travel which appear to take into account comments from the East and South East.
  - The 13 infrastructure priorities for joint lobbying should not be included without context as to their purpose. The priorities were jointly agreed for lobbying across the three regions because they help London, the South East and the East of England. It should be made clear in the narrative of the WSE policy (referred to in paragraph 9 of the accompanying report) that these priorities are not initial areas of search for additional housing growth. They were identified to deliver planned/expected growth.
  - There is a need for clarity on what London is offering to willing partners, and more care about how the policy of searching for willing partners is presented. The terminology around initial areas for growth indicates it may be limited to these 13 priorities. It was suggested that the draft Plan could include a formal call for 'willing partner' councils to come forward.
  - The GLA was asked when it will finalise the figure in relation to the shortfall in housing numbers.
  - With respect to the Green Belt, the Mayor of London's task of finding willing partners will be harder if outside London councils are reviewing the Green Belt but London refuses to do so at a strategic level.
  - A further issue is the type of housing that is being delivered in London, particularly the lack of affordable housing. Councils would like to discuss the delivery of the right sort of housing, including affordable homes not just luxury flats.
- 3.3. Jorn Peters advised that the GLA recognises that there may also be areas outside the 13 transport priority areas where there could be partners for growth. Also, if there is an area in any given corridor that is not interested in growth, then it will not be a partner for growth. Deputy Mayor Jules Pipe, added that the Treasury will not be keen to fund any schemes that simply meet existing demand, so the WSE would need to think carefully about how it presents the case for the 13 transport priorities. Jorn provided a list of meetings (see **Annex A**).
- 3.4. With respect to the need for clarity on the scale of London's unmet housing need, Jorn Peters said that there are still some uncertainties about the scale of the unmet need, but this is partly because the GLA is still considering further opportunities to maximise London's capacity to meet its own housing need, which is why the process of finalising the numbers is taking longer. The GLA is also looking at how to strike the right balance between land for housing and employment, and exploring ways of increasing supply of mixed use sites and small sites.
- 3.5. Jules Pipe reaffirmed the Mayor of London's commitment to protecting the Green Belt. There is significant potential in brownfield sites and low-density commercial sites, and the GLA is keen to encourage developers to make the most of these opportunities.

- 3.6. Jorn Peters also offered local partners outside of London the consideration of potential GLA support for their Housing Infrastructure Fund bids. The challenge is that the funds need to be spent by March 2021, and the bidding deadline is imminent.
- 3.7. With respect to employment land, councils outside of London are making provisions within their Local Plans, and it would be useful to understand from the GLA potential substitution / relocation opportunities. The GLA has completed as part of the draft London Plan evidence base Industrial Land Demand and Supply Studies, and a London Office Policy Review. These can be found here:
  - https://www.london.gov.uk/sites/default/files/ilds\_revised\_final\_report\_october\_2017.pdf
  - https://www.london.gov.uk/sites/default/files/industria land supply and economy2015.pdf
  - <u>https://www.london.gov.uk/sites/default/files/london\_office\_policy\_review\_2017\_final\_17\_06\_07\_</u> .pdf

# 4. Mayor of London's Transport Strategy Consultation

- 4.1. Mike Keegan from Transport for London presented on the Mayor of London's Transport Strategy (MTS), which is open for consultation until 2 October 2017. Mike highlighted that:
  - There is a focus in the MTS on a mode shift to walking, cycling and public transport, i.e. sustainable travel, which aims to improve Londoner's health and enables London to grow sustainably.
  - There is also a focus on space efficient transport modes and also more efficient and better planned freight and waste.
  - The MTS also contained the 13 transport priorities agreed by the WSE Political Steering Group, which will be revised in light of the above discussion with respect to the London Plan
- 4.2. Members welcomed the early opportunity to comment on the MTS. It was highlighted that:
  - They welcomed TfL's commitment to amend references to 13 WSE transport priorities. This would make it clear these are not assumed as corridors for accommodating growth from London.
  - The way to reduce travel into London is to have more jobs where the houses are. This is not reflected in the MTS, so anything London can do to support jobs outside London can help London's transport vision. Emphasising reducing the number of journeys is also really important.
  - With respect to TfL taking responsibility for part of the network beyond London, there should be joint control with councils in those areas. What modelling has London done, also on necessary capacity improvements, and to ensure stopping services primarily serving London do not negatively impact on longer-distance services from the WSE? What assurances can be given that authorities outside London are involved?
  - The MTS does not appear to focus on long-term technological changes and the advantages that technology will bring for infrastructure.
  - TfL not progressing the Metropolitan line extension contradicts the ethos of the MTS.
  - Important to continue to make the case for improved surface access to Heathrow to deal with existing pressures not just as a prerequisite for any future growth.
  - Clarification that congestion charging was still a key priority for the Mayor.

4.3. Mike Keegan advised that:

- The draft MTS is part of the GLA's broader concept of good growth, which promotes the reduction of the need to travel.
- On rail devolution: TfL are seeking devolution for local stopping services. Longer distance services
  would be protected. Longer distance journeys would be beneficial in terms of reliability and
  improved services. London Underground and TfL are among the top three rail operators in the
  country.

- On future technology: It is difficult to predict how technology can benefit transport, for example autonomous vehicles could increase congestion. The draft MTS sets out principles for what the Mayor will do to manage new technology and schemes as they emerge.
- The MTS is silent on the Metropolitan Line extension because there are funding issues.
- Pricing is part of what is needed to achieve the overall vision of the draft MTS on carbon; including
  a phased approach to ultra-low emission zones. Beyond this, TfL is looking at how to integrate
  multiple charges to make it easier for users and at new technology to better charge people for the
  way that they use their vehicles (based on time of day, length of journey etc.).
- In relation to capacity modelling: There is an evidence base which has been published alongside the draft MTS, which includes assessments and justifications of how to manage crowding on public transport.
- TfL has an ongoing programme of engagement with boroughs. Thurrock attends these meetings, others such as Surrey are considered for inclusion in this programme.

# 5. WSE Joint Lobbying – Update and next steps

### Infrastructure

- 5.1. Cinar Altun presented this item. The WSE lobbying activities were paused as a result of the recent extended purdah period. However since the general election lobbying activities have made progress. Notably, officers have secured a meeting with the Rt Hon Chris Grayling MP, Secretary of State for Transport on 11 October 2017 at 3:00pm. Members discussed and approved the following recommendations contained in the accompanying report:
  - Recommendation 1. Members approved the updated lobbying programme.
  - ACTION: Recommendation 2. Members mandated officers to begin preparing a high level joint WSE Autumn Statement Submission to promote the initial 13 transport priorities. It was suggested and agreed that Recommendation 4 be linked to this task, so that officers also explore if the WSE should respond/engage collectively with the Government's planned consultation on the establishment and funding of a "major road" network (proposed in the Government's New Transport Investment Strategy). [Complete]
  - ACTION: Recommendation 3. Members discussed preparations for the meeting on 11 October with the Secretary of State for Transport and agreed that a joint briefing will be prepared by officers ahead of this meeting. [Complete]
  - ACTIONS: Recommendation 5. Members agreed to approve the promotion of key developments through short news stories. [Ongoing]

### Housing

5.2. Nick Woolfenden, from South East England Councils presented this item. With respect to the letter that has been sent to Alok Sharma, Minister for Housing, members agreed that 2 members from each area should attend this meeting if a meeting is offered. It was also agreed that this same principle apply to the meeting with DfT on 11 October. Members highlighted that there is a need for certainty from government on the planning framework - continuously changing goal posts make it difficult to plan effectively and this should be raised with the Minister.

# 6. Demographics Update

6.1. Jorn Peters presented this item. GLA demographic projections were released and shared with councils across the WSE on 11 July and were accompanied by an explanatory note. The explanatory note has been discussed by the WSE Officer Working Group. This is now available on the WSE website. The explanatory note does not go into detail on local authority data but these can be extracted from the London Datastore: <a href="https://data.london.gov.uk/dataset/projections/">https://data.london.gov.uk/dataset/projections/</a> (see 'Long-term Trend (detailed &

national) folder). Any questions related to the projections can be directed to the GLA demographics team.

- 6.2. It was noted that the government is considering a new standardised methodology to calculate objectively assessed housing need, but these will still be underpinned by demographic projections. The GLA encouraged local councils to also consider GLA's projections as well as the official ONS ones.
- 6.3. Jorn also introduced the LSE Migration Review which is being led by the East of England LGA. Jorn stressed that from the London's perspective it is interesting and useful for London and South East as well. The clear relationship between international migration and domestic migration was highlighted, which shows that the higher international migration into London triggers additional displacement out of London. Richard Hatter added that the research shows that there is a deconcentration effect of migration in London. The deconcentrating flow exemplifies a more general processes of 'displacement' operating across the region as a whole from a complex chain of movements, whereby an external demand to move into an area (from abroad for work or from a few miles away for a house) stimulates some existing residents to move on and commonly further out. In terms of the impacts of Brexit, no historically-based projections can be modelled. Instead, the GLA is looking at a range of scenarios.

### 7. Preparing for the Wider South East Summit – Revised Date and Proposed Focus/Format

7.1. Nick Woolfenden presented the item and advised members that as the purpose of the next Summit is to focus on the draft London Plan, the GLA has advised it might be better to postpone the Summit – originally scheduled for 24 Nov 2017 – until later in the year or early 2018 (in case London Plan consultation is delayed). Jules Pipe will attend and the Mayor is being approached.

# 7.2. ACTION: Members agreed 26 January 2017 as the revised Summit date and that a save the date be circulated as soon as possible. (Complete)

### 8. Next Steps

8.1. Cllr David Finch summarised the key actions and closed the meeting.

### Next meeting: Confirmed as 21 March 2018

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# ITEM 2. ANNEX A - LONDON PLAN TEAM - WIDER SOUTH EAST MEETINGS - 2017

- 31 Jan Thurrock TfL (ELTOS) Grays
- 6 Feb South East Strategic Leaders (officer) City Hall
- 13 March Oxfordshire Growth Board Executive Officers Oxford
- 14 March Basildon Local Plan Duty to Co-operate City Hall
- 22 March Basildon/Essex/Havering Local Plan issues Havering
- 27 March Greater Thames Valley LEPs City Hall
- 28 March Chief Executive Harlow City Hall
- 20 April Broxbourne Local Plan Duty to Co-operate Cheshunt
- 12 May Kent Planning Policy Forum Maidstone
- 25 May Harlow (Members/Directors) City Hall
- 26 May East of England Demography Workshop Cambridge
- 7 June Catch-up with South East England Councils City Hall
- 9 June Collaboration opportunities with Essex City Hall
- 21 June Greater Thames Valley LEPs Basingstoke
- 29 June EoE Infrastructure & Growth Group (Council Members) Cambridge
- 10 July Bedford Local Plan Duty to Cooperate Bedford
- 19 July Basingstoke & Deane Horizon 2050 Basingstoke

### Coming up:

- 24 July Medway Local Plan Duty to Cooperate Chatham
- Tbc Collaboration opportunities with Essex follow-up Chelmsford
- Tbc Co-op Member Board (East Herts / West Essex Council Members)
- Tbc North of Cambridge and Peterborough
- Tbc Hertfordshire

### **Regular Meetings**

- WSE partnership: Annual Summit, Political Steering Group, Officer Working Group
- Thames Gateway: Strategic Group, Crossrail Extension Group
- Stansted Cambridge Consortium: LSCC Board, Annual Forum, West Anglia Taskforce
- Heathrow: Strategic Planning Group (GLA observer status)
- Annual Planning Officer Society (POS) London and South East

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# **ITEM 3: SUMMIT EVALUATION AND WSE PSG PRIORITIES FOR 2018**

### **Recommendations**

Members are asked to:

- a) Note the report of the successful 26 January Wider South East Summit, to be made publicly available on the WSE website.
- b) In light of Summit conclusions, confirm ongoing engagement on London Plan, strategic infrastructure and tackling housing delivery barriers as core shared priorities for the 2018 WSE work programme (further details on next steps in items 4, 5 and 6 of today's agenda).
- c) In light of Summit discussions, consider looking at additional shared work areas around environment/natural resource management and digital infrastructure (see Annex B).

# ADDRESSING GROWTH CHALLENGES ACROSS THE WIDER SOUTH EAST

Report of the Wider South East Summit, 26 January 2018

### Summary

- 1. Summit conclusions:
- 1.1 Over 100 councillors, the Mayor and Deputy Mayor of London, officers and LEP representatives took part in the 26 January Wider South East (WSE) Summit, to discuss the London Plan and other priorities for political engagement between London, South East and East of England. The importance of continuing to develop collaboration on growth, infrastructure and related strategic planning framework was reiterated by the Mayor of London Sadiq Khan, Deputy Mayor Jules Pipe, Chair of South East England Councils Cllr Nicolas Heslop, and Chair of the East of England Infrastructure and Growth Group Cllr David Finch, as well as in contributions from the floor.
- 1.2 The preparation of the new draft London Plan provides an important focus for the current phase of that collaboration. This includes the challenge of meeting housing need across London and the Wider South East, growing the WSE's national economic contribution (including local economies), securing infrastructure investment and the opportunity for discussions with willing partners about strategic growth opportunities in the wider city region.
- 1.3 The Summit welcomed the work of the WSE Political Steering Group (PSG) on tackling barriers to housing delivery and strategic infrastructure priorities. It is important that work continues on both topics and that the challenge of securing tighter prioritisation of infrastructure projects is explored further in terms of both the number of priorities and a phased approach to delivering them.
- 1.4 The issues raised during table discussions on the new draft London Plan included:
- The potential for London Boroughs to be more actively engaged in the work of the PSG, given their role in helping the Mayor deliver against housing targets.
- Calls for a more active approach to stimulating discussions between the GLA and willing partners on strategic growth opportunities and more clarity about the possibilities.
- The importance of London and the WSE acting as a counter-weight to arguments from the Northern Powerhouse and Midlands Engine, particularly in relation to WSE infrastructure investment which is essential to enable national economic growth.
- Concerns that there should be an assessment of the London Green Belt to ensure that the majority of Green Belt land is protected while enabling additional residential development where appropriate inside London's boundaries.
- The absolute importance of infrastructure investment to support growth aspirations and address public concerns across London and the WSE.
- An appetite for more collaboration on digital issues, in particular to help minimising the need to travel.

1.5 Key issues raised during table discussions on priorities for PSG work in 2018 reinforced the need to continue work on ways to address the WSE's large numbers of unimplemented planning permissions. The PSG should also continue work to press for infrastructure investment and consider whether there is capacity in for WSE engagement to address the challenges around natural resources.

# Main report of the Summit:

# 2. New London Plan

- 2.1 Opening the Summit, Mayor Sadiq Khan outlined his ambition to create fairer, more inclusive, more prosperous places for people to live, work and play. He set out how his new draft London Plan would deliver sustainable and inclusive 'good growth' addressing challenges include accommodating London's population boom while ensuring space for businesses and delivering the infrastructure needed to maintain quality of life. The Mayor aims to accommodate the vast majority of London's housing need within its boundaries and said that by combining economic and political power, key infrastructure projects such as Crossrail 2 can be delivered. But planning for longer-term uncertainties is necessary. Therefore, he is also calling to explore with 'willing partners' how to accommodate growth in sustainable locations outside the capital for mutual benefit, in particular in areas with longer-term ambitions for significant growth. All delegates were encouraged to submit written responses to the London Plan consultation by 2 March 2018.
- 2.2 The Mayor thanked SEEC and East of England LGA members for their work on the WSE Political Steering Group (PSG) and stressed the importance of using this partnership to help tackle shared growth challenges and jointly influence Government for solutions.
- 2.3 He said that while London is a leading global city, it is not an island. Much of what London has achieved has been enabled by its connections with the WSE, whose communities, economies and housing markets are intrinsically linked. It is important to sustain and improve these.
- 2.4 Key proposals in the new draft London Plan relevant to WSE members, outlined by the Mayor and Deputy Mayor Jules Pipe, included:
  - The Mayor's aim to meet the vast majority of London's housing need in the capital's boundaries without infringing on London's Green Belt.
  - Ambitious 10-year targets for London boroughs to double the current rate of homebuilding, including a specific target for small sites and with 50% of all new homes to be 'genuinely affordable'.
  - Delivery focus the whole draft Plan has undergone a detailed viability study showing that the policies can be delivered.
  - As a longer-term contingency, seeking 'willing partners' outside London who would consider accommodating some of London's housing growth and jobs where there are mutual benefits; building such relationships will take time and one size does not fit all.
  - Support for the <u>13 initial WSE Strategic Infrastructure Priorities</u>, agreed by last year's Summit.
  - Recognition of the need to sustain the interconnected and nationally-important WSE economy.
  - Support for additional aviation capacity but opposition to expansion of Heathrow Airport unless no additional noise or air quality harm would result.
  - Metropolitan Line Extension TfL has been unable to reach agreement with Government over responsibility for any further increase in costs. However, the GLA remains open to working with Hertfordshire County Council and other stakeholders on potential alternatives.

- 2.5 SEEC Director Heather Bolton led a question time debate for attendees with the Mayor and his deputy Jules Pipe, SEEC Chairman Cllr Nicolas Heslop, and Chairman of the East of England Infrastructure and Growth Group Cllr David Finch.
- 2.6 Responding to the Mayor of London's housing and growth proposals, Cllrs Heslop and Finch welcomed the constructive political dialogue built with the Mayor's office through the PSG and the ambition for London to meet the vast majority of its housing need within its own boundaries.
- 2.7 The Mayor answered questions on WSE concerns including:
  - How would the Mayor ensure he delivers on the Plan's aims for accommodating London's housing need in its boundaries?

The Mayor explained that he intends to deliver 65,000 of the roughly 66,000 homes needed in London each year by encouraging higher densities and better use of land, including development on small sites. The GLA is proposing ambitious 10-year housing targets, on the basis it is prudent to look at a realistic timeframe. He admitted it may be tough to make sure the 33 London boroughs all play their part in meeting housing need but he is talking to them about this. He also highlighted that delivering 50% affordable homes would require central government to play its part – for example, through further relaxation of the HRA cap.

- How the 'willing partners for growth' approach could operate, and how it can support 'good growth' for the whole WSE including jobs and services alongside homes? The Mayor said his aim is to have conversations between willing councils outside London and GLA about mutually beneficial needs and opportunities including for example, locations for business and industry and related employment. There may also be opportunities to lobby government together for infrastructure investment that would make greater housing and economic growth attractive to areas outside London.
- 2.9 After question time, Independent Summit facilitator Phil Swann introduced round table discussions which gave all delegates the opportunity to discuss the draft London Plan in more detail. Key issues raised included the housing target, the 'willing partners' approach, and infrastructure requirements. See Annex A for fuller summary.
- 3. Other priority joint issues housing delivery and infrastructure
- **3.1** <u>Tackling housing delivery barriers</u> Cllr Heslop highlighted important WSE work on tackling housing delivery barriers over the past year, and opportunities to influence Government on speeding up delivery in 2018. Slow use of approved housing permissions by developers is holding up delivery of local growth plans across the WSE, and puts more pressure on councils to release extra development land unnecessarily. He highlighted figures showing over a third of a million unused housing permissions across the WSE, including 274,000+ in London, more than 60,000 in the South East and 40,000 in East of England.
- 3.2 Cllr Heslop explained that over the past year the PSG met Housing Minister Gavin Barwell and followed up with his successor Alok Sharma and it is now important to engage the new Minister, Dominic Raab. He added that the current review of unimplemented permissions by Sir Oliver Letwin represents a further opportunity to call for action to tackle these issues. He also welcomed the fact that the Treasury Select Committee has backed the WSE call for councils' housing borrowing limits to be lifted. This creates an opportunity to build on growing consensus to try and secure the ability for councils to borrow to build homes directly at scale.
- 3.3 He outlined other ongoing priorities to address delivery barriers, as highlighted in the joint <u>WSE</u> response to consultation on the Housing White Paper:
  - The need for further tools and new ways to tackle unused planning permissions.

- More funding opportunities and flexibilities for supporting infrastructure and affordable homes.
- Greater influence for councils to steer skills funding to increase construction sector capacity.
- 3.4 Cllr Heslop also highlighted a new challenge posed by Government's proposed housing need figures, set out in 'Planning for the right homes in the right places'. In the South East these have produced some unexpected results including reduced need figures in growing urban areas and unachievable increases in areas with large amounts of protected land. The Summit endorsed continued focus on tackling housing barriers as a shared priority for 2018's joint WSE work.
- **3.5** <u>Strategic infrastructure priorities</u> Cllr James Jamieson from the East of England Infrastructure and Growth Group outlined the initial <u>13 Wider South East strategic transport priorities</u>, as agreed by last year's Summit. He emphasised the importance of continuing to jointly make the case for infrastructure investment to support growth plans and address public and business concerns about a funding deficit across the WSE. The Mayor had earlier told the Summit that by working together, the collective power of WSE partners could be harnessed to help progress infrastructure projects that are vital to future growth ambitions, for example Crossrail 2. Better digital infrastructure is also needed to support different patterns of work.</u>
- 3.6 Cllr Jamieson explained the Government's own data shows the WSE is the UK's economic 'engine room'. However, infrastructure improvements are needed to match the pan-regional economic ambition and potential. With the right support, the 13 transport priorities have potential to support over 570,000 new homes and third of a million new jobs across the WSE; and some of the priorities give better access to ports and airports for businesses UK-wide, boosting national productivity/growth. PSG members met Transport Secretary Chris Grayling in October to highlight the importance of the 13 WSE priorities and now need to consider the Minister's request to refine and focus priorities further. Engagement with the emerging Sub-National Transport Bodies to strengthen the case for investment through alignment of priorities would form an essential part of this.
- 3.7 SEEC Chairman Cllr Nicolas Heslop highlighted that the South East alone faces a £15.4bn infrastructure funding gap by 2030, and that additional growth will exacerbate this. He said the WSE needs to emphasise to Ministers that without funding to support our planned growth we risk damaging the economy and at least some of this funding needs to come from national Government. He said Government should also look at allowing councils access to more funding for example a share of stamp duty collected locally and greater retention of locally-raised business rates.
- 3.8 The Summit endorsed continued focus on infrastructure investment and agreed that the PSG should work on refining the list of 13 priorities. The intention is to add value to and support local lobbying, not duplicate it. Talks with the emerging Sub National Transport Bodies (such as Transport for the South East) are also planned to explore alignment of priorities.
- 3.9 <u>After question time, round table discussions</u> gave all delegates the opportunity to discuss the potential priories for 2018 further. Key issues raised included support for continued work on tackling housing barriers, strategic transport, and to explore if there was capacity for WSE joint working to further consider environmental management issues and digital infrastructure. See **Annex B** for fuller summary.

# **ITEM 3 ANNEX A: NEW DRAFT LONDON PLAN - SUMMARY OF FEEDBACK**

# Housing Target

- New target may be unrealistic to deliver in the light of limited capacity of local authorities and building industry.
- If the target is not delivered, there could be further out-migration from London potentially with implications for authorities outside London in terms of infrastructure requirements, house prices, housing-employment balance, quality of life, which should be considered.
- The target only covers the next 10 years leaving uncertainty in terms of housing supply beyond this period.
- London needs to look at the Green Belt, as many authorities outside London do, to contribute to meeting their housing need.

# Willing Partners

- There should be more transparency and guidance around our Willing Partners policy how does it work, who to talk to at which level, who are GLA talking to already?
- There should be greater clarity on offer to / deal with potential Willing Partners, in terms of opportunities related to economic development and infrastructure improvements.
- Local ambitions to build sustainable communities not just commuter towns outside London should be respected.

### Infrastructure Requirements

- There is insufficient Government funding to forward fund required strategic infrastructure.
- Capturing land value uplift to help fund infrastructure should be strengthened.
- The Metropolitan Line Extension not going ahead sends the wrong signal in terms of collaboration on growth and infrastructure.
- London's support for infrastructure provision should extend beyond its immediate neighbours and include for example engagement with Oxford-Cambridge growth corridor.
- In terms of environmental infrastructure such as waste management and water supply, it should be clear, if/when London can meet its own requirements.
- In terms of social infrastructure policies, impacts on authorities outside London should be recognised.
- Collaboration opportunities related to improving digital infrastructure should also be explored.

# **Economic Development**

- There should be more clarity on intelligence and collaboration opportunities related to jobs and the scope for exploring economic complementarity.
- WSE collaboration is vital to help addressing completion from the North of the country.

### Relationships

• The London Boroughs and their neighbours outside London should engage more closely and the London Boroughs should be more explicitly part of the WSE work generally.

# ITEM 3 ANNEX B: 2018 WSE PRIORITIES – SUMMARY OF FEEDBACK

# Consensus on continued focus on:

# ✓ London Plan

- Continued close engagement post-consultation and during next steps (EIP etc.).
- Importance of understanding how 'willing partners' approach would work in practice, including what is being asked of/on offer to potential partners outside London.
- Need for continued joint work on strategic issues, including shared infrastructure priorities (see below).

# ✓ Strategic transport infrastructure

- Mixed views on whether PSG should prioritise 'within' the 13 transport priorities, *or* maintain focus on <u>all</u> 13 priorities as they are all essential for growth.
- <u>If prioritising</u>, should consider criteria covering economic, environmental and social aspects to help identify the priorities, along with timescales for delivery.
- Important to maintain a focus on orbital WSE routes, not just radial, to release capacity on London routes and serve areas outside London.
- Should consider role of Sub-National Transport Bodies.
- In relation to funding options, partners should explore public and non-public investment sources to fund infrastructure schemes, as well as pressing Government for devolved fiscal powers for local government. Important to be able to fund new schemes <u>and</u> maintain existing network.

# ✓ Tackling housing delivery barriers

- Continued priority to press Government for council powers to incentivise ('carrots and sticks') timely build-out of permissions; also to tackle 'approval banking' by land agents who sit on the land once permission granted and then expect permission to be reapproved automatically. Also tackle other capacity issues including encourage small builders, construction skills gaps, and potential of modern construction methods.
- Continue to make the case for affordable homes funding powers/freedoms and opportunities for councils to build more themselves (for example lifting HRA cap).
- Make the case for local retention of (at least some of) land-value uplift from land designated for development and/or planning permission, and any other new fiscal measures, to support infrastructure provision which unlocks/supports development (for example TIF).

All the above should be set in the context of creating good places and strong economies for communities across the WSE - importance of co-location of homes, jobs, infrastructure, and services including education and health.

# Possible additional issues for PSG to consider engagement on, subject to capacity:

- **Natural resources/ environmental management** consider if scope/capacity to look at utilities i.e. water/waste/energy issues, re meeting current and future demand.
- **Digital / smart approaches / technologies** these could help reduce the need to travel; many authorities are actively seeking to explore the potential, but it's a new and rapidly growing sector, where collaboration on good practice / lessons learnt could be beneficial; also significant potential impacts through retrofitting relevant technology into existing housing stock and urban fabric.

# ITEM 4. NEXT STEPS FOR THE DRAFT LONDON PLAN

**Recommendations** 

Members are asked to note:

- a) Initial high-level overview of consultation responses
- b) Explanation of willing partners approach
- c) Next formal steps.

### 1. Consultation responses

1.1 Wider South East (WSE) partners had the opportunity to inform the London Plan preparation prior to formal consultation, also through previous Political Steering Group meetings. The draft London Plan consultation took place from 1 December 2017 to 2 March 2018. Far over 1,000 consultation responses have been received, and many authorities from outside London have taken the opportunity to respond. It is too early for a comprehensive overview, but key strategic London-focused issues that have been raised include for example:

# 1.2 Housing/Design

- Mixed views on housing issues form very positive feedback about the Mayor positivity tackling the housing crisis, to concern from London boroughs about their ability to deliver the targets, especially in relation to small sites
- Misconstrued concerns about building on garden land
- Some stakeholders questioning why the Mayor isn't reviewing the Green Belt
- Whilst there is a general understanding the challenges and support for trying to meet London's growth, there is concern that housing pressures might stop other uses such as social infrastructure or employment
- Housing Size Mix concern about the approach to ensuing the delivery of family housing across different tenures
- Very positive feedback on the emphasis placed on the importance of design, however, concern about resources and skills in local planning authorities in undertaking design reviews, establishing design codes etc.
- More clarification needed over how densification and conserving the character of places work together

# 1.3 Economy

- Questions over the potential impact of Brexit and how the Plan is future proofed
- Lots of positive feedback in regard to the protection of industrial capacity and interest in how its intensification can work
- However, still concerns from some stakeholders that the no net loss of industrial floor space capacity doesn't go far enough

### 1.4 Transport

- There is support for growth in suburban outer London however much greater investment needed in infrastructure, especially buses, to provide better connections, notably for orbital travel
- Concerns surrounding the delivery of supporting transport infrastructure in East London
- Push back from outer London boroughs on residential parking standards, especially in relation to car free developments
- Concern that the draft Plan is too light on new and emerging technologies especially around autonomous vehicles and their supporting infrastructure.

### 2. Policies SD2 and SD3 in the draft London Plan are of particular relevance in the WSE context.

#### Policy SD2 Collaboration in the Wider South East

А

The Mayor will work with partners across the Wider South East (WSE) to address appropriate regional and sub-regional challenges and opportunities through strategic coordination arrangements.

В

To secure an effective and consistent strategic understanding of the demographic, economic, environmental and transport issues facing the WSE, the Mayor supports joint working with WSE partners to ensure that plan-making is, as far as possible, informed by consistent technical evidence.

С

The Mayor will take account of the views of WSE partners in discharging his Duties to Inform and Consult with authorities beyond London and will respond to their Duty to Co-operate requests for views on Development Plans insofar as they bear strategically on London.

D

The Mayor supports recognition of long-term trends in migration in the development of Local Plans outside London.

Е

The Mayor will work with WSE partners to find solutions to shared strategic concerns such as: barriers to housing and infrastructure delivery (including 'smart' solutions - see also draft London Plan paragraph 9.6.7); factors that influence economic prosperity; the need to tackle climate change (including water management and flood risk); improvements to the environment (including air quality) and waste management (including the promotion of Circular Economies); wider needs for freight, logistics and port facilities; and scope for the substitution of business and industrial capacity where mutual benefits can be achieved.

# Policy SD3

# Growth locations in the Wider South East and beyond

А

The Mayor will work with relevant WSE partners, Government and other agencies 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 to meet need and secure mutual benefits for London and relevant partners.

В

The Mayor supports recognition of these growth locations with links to London in relevant Local Plans.

- 2.1 See **Annex A** for diagram of Initial Strategic Infrastructure Priorities, WSE partners have jointly developed. This is part of the draft Plan.
- 2.2 WSE partners raised for example the following issues (see also Annex A of Item 3 paper Summit table discussion summary draft London Plan):
  - Welcome the changes that have been made to address early concerns
  - Concerned that London may not meet its ambitious housing and affordable housing target and that it only covers the next 10 years

- Lack of clarity and detail on what London can offer to potential willing partners for growth ('what is in it for them'), in terms of support for infrastructure, economic development, etc.
- There should be a strategic assessment of the London Green Belt to contribute to London's potential growth requirements

# 3. Explanation of willing partners approach

- 3.1 The following is supporting text from the draft London Plan (2.3.4, 2.3.5, 2.3.7 and 2.3.8) providing a broad indication of the Mayor's approach to collaboration with willing partners:
  - 'Despite the draft London Plan seeking to accommodate the vast majority of London's future growth, some migration will continue. Given the pressure for growth in both London and the WSE, the barriers to housing delivery that need to be overcome to avoid a further increase of the backlog, and potential changes to projections over time, it is prudent to plan for longer-term contingencies. Therefore, the Mayor is interested in **working with willing partners** beyond London to explore if there is potential to accommodate more growth in sustainable locations outside the capital.'
  - 'Partnership work could help deliver more homes, address housing affordability and improve economic opportunities outside London. The focus is on locations that are (or are planned to be) well-connected by public transport and where development can help meet local growth aspirations as well as wider requirements. Recognising that investment in public transport can often bring significant benefits to wider areas, such partnerships could focus on optimising rail capacity between London, the wider region and beyond. Another area of focus could be proposals for new/garden settlements with good links to London. The Mayor could help to investigate and secure mutually beneficial infrastructure funding to unlock these opportunities.'
  - 'Collaboration with willing partners can help alleviate some of the pressure on London while achieving local ambitions in the WSE for growth and development, recognising that this may require further infrastructure. The Mayor will work with key willing partners, including local authorities, Local Enterprise Partnerships, the National Infrastructure Commission and Government, to explore strategic growth opportunities where planning and delivery of strategic infrastructure (in particular public transport) improvements can unlock development that supports the wider city region.'
  - 'It will be important to ensure that growth in the WSE contributes to local vibrancy and economic activity at all times of the day and week, and that the scale of planned growth is proportional to public transport capacity in the area. Where appropriate, the Mayor will support for example Memoranda of Understanding to formalise **partnership agreements**/ commitments between relevant authorities. Work with some individual authorities and groups of authorities in the WSE has been initiated and is being pursued further. The Mayor continues to encourage authorities outside London to become willing partners and work with the capital on opportunities for growth, where mutual interest can be achieved.'
- 3.2 In practical terms the approach means that the GLA will continue to be open to conversations with interested partners in order to explore longer-term collaboration opportunities and agreements tailored to locational circumstances and beyond current Local Plan timescales. This may for example include identifying authorities with strategic longer-term ambitions for growth over and above local need and/or where strategic transport capacity increases are being considered. The GLA would welcome bilateral meetings with such authorities or groups of authorities. Currently, opportunities are for example being discussed with South Essex authorities. Some opportunities are also arising from the

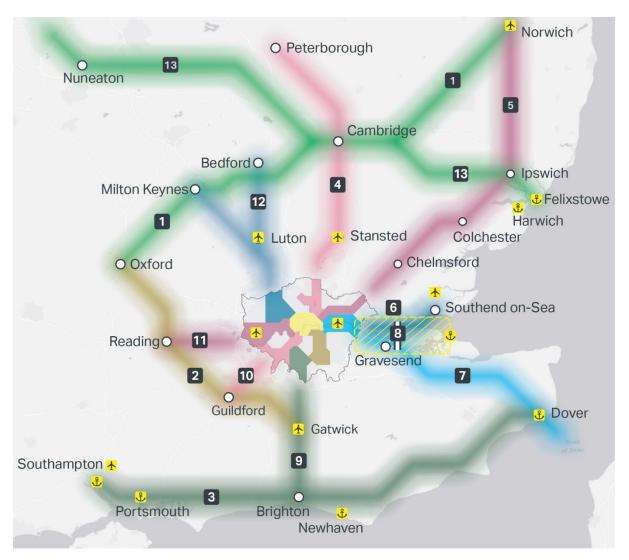
GLA's strategic Duty-to-Cooperate responses to Local Plans outside London, but again, opportunities may not be confined to current Local Plan timeframes.

3.3 Support and facilitation by SEEC, East of England LGA and other regional stakeholders would be welcome, and the GLA will remain transparent about key bilateral meetings with WSE authorities and groups of authorities.

# 4. Next steps

- 4.1 The indicative timetable for the next formal steps in the preparation of the London Plan are as follows. The Plan refinement process is now in the hands of the Inspector:
  - Summer 2018 Consultation on Examination in Public Matters
  - Winter 2018/19 Examination in Public
  - Summer 2019 Submission to Secretary of State
  - Autumn 2019 Adoption/Publication

# ITEM 4. ANNEX A - WIDER SOUTH EAST – 13 INITIAL STRATEGIC INFRASTRUCTURE PRIORITIES



# **Strategic Infrastructure Priorities**

- 🛧 Airport
- 🕹 Port
- 📄 Thames Estuary Ports
- 🚧 London Growth Areas

Source: Wider South East Partnership

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### **ITEM 5. JOINT INFRASTRUCTURE PRIORITIES**

### **Recommendation**

It is recommended that:

- a) Members consider how WSE PSG political engagement with emerging Sub-National Transport Bodies (STBs) across the Wider South East could strengthen its reach/effectiveness when making the case for strategic transport investment with national partners and Government.
- b) Members to consider the further prioritisation and phasing of WSE joint infrastructure priorities in collaboration with the STBs and others
- c) WSE Officer Working Group be tasked with reviewing and updating the Infrastructure Lobbying Programme in consultation with STBs and other relevant stakeholders.

### 1. Purpose

- 1.1. The 13 schemes/transport Corridors for initial WSE lobbying have been approved by both the Wider South East Political Steering Group (WSE PSG) and WSE Summit. Representatives from the PSG met the Rt Hon Chris Grayling MP, Secretary of State for Transport on 11 October 2017 to make the case for Government support for these schemes. At that meeting the Minister welcomed the collaborative effort but suggested that given limited Government infrastructure funding further work be undertaken in the WSE to make the list of priorities shorter and more specific. He also suggested political engagement with the emerging Sub-National Transport Bodies (STBs) could help strengthen the case for investment through alignment of priorities.
- 1.2. Today's meeting provides PSG members with an initial opportunity to discuss how political engagement between the WSE PSG and emerging STBs could help strengthen the case for funding the WSE strategic transport priorities.
- 1.3. Through discussion with senior political representatives of each STB who are existing PSG members the aim of today's meeting is to:
  - Explore the potential for political engagement/alignment on WSE priorities between the WSE PSG and relevant sub-national transport bodies,
  - Explore practical ways the PSG, STBs and local partners might align key priorities, messages and asks to strengthen the case for Government support and funding,
  - Avoid duplication of effort on joint priorities.

# 2. Why engage with Sub-national Transport Bodies?

- 2.1 The Cities and Local Government Devolution Act (2016) gained Royal Assent on 28 January 2016. The Act provides for local partners to put forward to Government a proposal to establish a statutory Sub-national Transport Body (STB). As part of this policy, Government sees STBs as delivering improved collective transport planning and decision making over areas larger than current transport authorities. Local partners are encouraged to form a statutory Sub-national Transport Body that would have direct influence over decisions that are currently within the control of Government and its agencies (for example, Network Rail and Highways England). There are three emerging STBs in the WSE, in different states of development: Transport for the South East, England's Economic Heartland and Transport East.
- 2.2 The Department for Transport (DfT) has also stressed the importance of STBs reflecting "transport corridors" (i.e. reflecting natural patterns of movement and trade). DfT feels that this focus on transport corridors will assist in the development of coherent Transport Strategies.

- 2.3 The notion of transport corridors to support local as well as wider sustainable plans for homes and jobs growth was also a factor in shaping the 13 Wider South East strategic transport priorities (and indeed incorporated into the Draft London Plan). Thus there is potential synergy between the work of the STBs and the WSE infrastructure programme. This shared focus could be utilised to align/strengthen the WSE lobbying asks of government.
- 2.4 There could also be further benefits to working with the STBs, such as:
  - A clearer articulation of evidence base in relation to strategic priorities with the development of sub-national transport strategies;
  - The ability to strengthen lobbying and attract investment through working with broader range of partners.

### 3. Introduction of Sub-national Transport Bodies

- 3.1. To support this discussion PSG Members representing an STB have been asked to each provide a brief introductory 5 minute update to cover:
  - Brief outline of approach membership, governance, function, boundaries, etc.
  - Strategic vision and ambition.
  - Emerging or established aims and priorities
- 3.2. Brief background about the three STBs are provided below:

### **Transport for the South East**

- 3.3. Transport for the South East is a partnership to improve the transport network for all and grow the economy of the South East area. It covers an area stretching from the English Channel to the border of London, and from the Kent coast to Berkshire, Hampshire and the Isle of Wight.
- 3.4. The aim of Transport for the South East (TfSE) is to help support and grow the economy in the South East by choosing the right strategic transport priorities for investment.
- 3.5. TfSE represents all the area's transport authorities and its local enterprise partnerships. District councils are also engaged. It will speak with a single voice on the South East's strategic transport needs, directly influence how and where money is invested and drive improvements for the travelling public. There is no body which currently performs this role.
- 3.6. TfSE will also involve transport operators, users and businesses and national bodies including the Department for Transport, Network Rail and Highways England. All these will be closely consulted as TfSE develops a transport strategy for the South East. TfSE currently operates as a shadow body. The intention is that, with Government approval, it will begin full operation in 2020.
- 3.7. More information about Transport for the South East can be found here: <u>https://transportforthesoutheast.org.uk/</u>

### **England's Economic Heartlands**

- 3.8. England's Economic Heartlands is a voluntary partnership of councils and local enterprise partnerships. It represents the growth corridor from Oxfordshire through Milton Keynes and across to Cambridgeshire.
- 3.9. The original Heartland Alliance grouping launched in December 2014, but has expanded since then to include councils with transport responsibilities from Oxfordshire across to Cambridgeshire and representatives from all relevant local enterprise partnerships. The membership directly reflects

the Government's recognition that the Oxford to Cambridge growth corridor will be critical to the UK's economy going forward. In December 2015, a Strategic Transport Forum was introduced, which meets in public and also includes representatives from Government, other agencies and transport contractors and providers.

- 3.10. England's Economic Heartland's work programme is co-funded through a combination of contributions from local partners and the Department for Transport.
- 3.11. Strong strategic leadership and collaborative working, founded in mutual trust and confidence are key to the success of the Strategic Alliance. This philosophy extends from the collective recognition across the membership of the core purposes of this Alliance model:
  - Strategic infrastructure issues (and solutions) extend beyond any one single area.
  - Issues that are common to one or more areas can benefit from a co-ordinated response.
  - The need for stronger integration of investment by Government, its agencies, local authorities, as well as infrastructure and service providers.
  - To push the case for investment through a single voice and at the right scale to have impact and success.
- 3.12. More information about England's Economic Heartlands can be found here: <u>http://www.englandseconomicheartland.com/Pages/home.aspx</u>

### **Transport East**

- 3.13. On 21 December 2017, East of England leaders from councils, Local Enterprise Partnerships, transport providers, representatives from Government infrastructure agencies and others responsible for transport services came together to explore the opportunity to form a new non-statutory sub-national transport forum in the East of England. Those attending the Transport Summit agreed to form 'Transport East' with the inaugural meeting to take place in the New Year. The inaugural meeting took place on 13 March 2018.
- 3.14. The Transport East membership includes representatives of Local Transport Authorities, District Planning Authorities, Local Enterprise Partnerships, and will work with transport providers in the East of England with representatives from Government, infrastructure agencies and transport service providers in a collaborative partnership.
- 3.15. Transport East aims to support the development of a transport network that:
  - is innovative and prepared for future developments.
  - enables housing growth.
  - enables the efficient and effective movement of people and goods to boost economic growth.
  - ensures that growth in the East is sustainable, encompassing all forms of transport including, public transport, walking and cycling.
  - ensures that the East of England is a place where people want to live, work, learn and visit.
  - enables people to live independently and to make the most of opportunities as they arise.
- 3.16 Membership and Terms of Reference are to be confirmed. More information and an update on activities will be provided at the WSE Political Steering Group meeting on 21 March 2018.

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# **ITEM 6. TACKLING HOUSING BARRIERS**

### **Recommendation:**

Members agree to write to new housing minister Dominic Raab, outlining ongoing priority issues/actions needed to tackle WSE housing delivery barriers, and requesting a meeting.

- 1.1 Tackling housing delivery barriers remains a key priority for Wider South East (WSE) partners. In the year to March 2017 London, the South East and East of England saw over 101,000 homes delivered, but there remains a growing pipeline of unimplemented homes with planning permissions. LGA research shows the South East had at least 60,000 unused planning permissions and there were over 40,000 in the East. The GLA's own London database shows 282,000 homes unbuilt in London at the last count significantly underestimated by LGA's research. Previous WSE analysis extrapolated the differences between GLA and LGA data, increasing the total estimate of unimplemented homes across the WSE to 500,000. Collectively this holds back delivery of approved growth plans. January's WSE Summit endorsed continued action on this shared priority.
- 1.2 There have been two significant changes on this issue since the last PSG:
  - New housing minister Dominic Raab appointed in 2018 (replacing Alok Sharma, who in turn had replaced Gavin Barwell following 2017's General Election).
  - Draft new National Planning Policy Framework (NPPF) and associated guidance in March 2018.
- 1.3 Following good dialogue with <u>Gavin Barwell</u> last year, a follow-up joint response to the <u>Housing White</u> <u>Paper</u>, and correspondence with <u>Alok Sharma</u>, the PSG should consider building engagement with the new minister Dominic Raab to raise ongoing issues with him. It is therefore proposed the PSG sends a letter – jointly signed by the lead member from each PSG partner body – to the new Minister. This will highlight key WSE issues and ask to meet to discuss progressing related actions in the context of the consultation NPPF.
- 1.4 The PSG has previously focused on three key aspects where further Government action is required to help achieve the step change in housing delivery that ministers and WSE partners want to see. Initial analysis of the NPPF indicates these still require further action. Member views are invited on these, or any other issues, to be raised in the high-level introductory letter to the Minister:
  - Industry delivery speed, capacity and approach: We are pleased that Government has recognised the problem of unimplemented planning permissions and build-out times. However, further action is still needed to deliver the Government's aim of increasing housing supply especially given the proposed new 'housing delivery test' on councils. The review by Sir Oliver Letwin announced in December reflects our joint call for a new look at ways to tackle unused planning permissions, and is an opportunity to take forward our call for discretionary powers for councils to charge for unused permissions.
  - <u>Affordable housing</u>: We have previously welcomed several Government actions to support building affordable homes to rent and buy, especially recognition of the need for more rented homes, for which few issues around absorption rates (i.e. commercial concerns about speed of sale) would apply. *However, further action is needed to free-up finances to build affordable homes at scale, for example through relaxing Housing Revenue Account borrowing (as supported by January's Treasury Select Committee findings), and increasing flexibilities around the use of Right to Buy receipts.*

- Infrastructure: We have previously welcomed Government recognition of the importance of infrastructure in unlocking housing growth, including utilities, and some funding opportunities. However the scale of challenge of improving and maintaining infrastructure requires more funding opportunities than are currently on offer. At least some of this funding needs to come from national government, as well as allowing local areas new opportunities to access more funding for example a share of stamp duty collected in our areas and greater local retention of locally raised business rates. Additionally, a strategic approach is needed from the construction industry/utilities and regulators to allow for timely funding and delivery of large scale infrastructure to unlock development.
- 1.5 Member views are also invited on whether the letter to the minister should raise concerns from some WSE councils about challenges arising from MHCLG's proposed standard housing need methodology, set out in the draft NPPF and associated Planning Practice Guidance. Some councils have highlighted these produce unexpected results - for example some growing urban areas see reduced need calculations, but some areas with large amounts of protected land see large, possibly unachievable, increases in their housing figures.