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Jules Pipe  
Deputy Mayor, Planning, Regeneration & Skills  
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*Sent via email.*

4 August 2017

Dear Jules

**Shaping the new London Plan: Approach to Wider South East policies**

Thank you for the constructive discussions at the 21 July Wider South East Political Steering Group (WSE PSG). We thought it would be helpful to reiterate some key points from South East PSG members, to inform your further development of London Plan policies prior to formal consultation later this year.

Key issues are set out below in more detail, but in summary they address South East members' calls for:

1. Confirmation as soon as possible of any gap between London's housing need and ability to delivery, the evidence underpinning this, and the steps the Mayor is taking to minimise the gap within London itself – we also urge him to consider Green Belt review, as South East councils are already doing.
2. Clarification of the Mayor's approach if willing partners for growth are needed outside London.
3. Ongoing collaboration, including the opportunity to comment on further iterations of London Plan Wider South East (WSE) policies prior to formal consultation.

**1. Confirmation as soon as possible of any gap between London's housing need and ability to delivery, the evidence underpinning this, and the steps the Mayor is taking to minimise the gap within London itself– we also urge him to consider Green Belt review, as South East councils are already doing.**

- 1.1 We welcomed your update about what you are doing to look at options to address and minimise any possible gap between housing demand and the ability to deliver this in London itself. The scale of any housing 'gap' is a significant issue for councils in the South East, given your emerging policies indicate you may look to work with partners outside the capital to help deliver homes where you cannot meet needs within London.
- 1.2 As you are aware, many councils in the South East already face challenges meeting their own existing high levels of housing demand, have their own local economic and growth ambitions, and face infrastructure and protected land-use constraints. Our members are clear that it cannot be assumed there is capacity outside London to help accommodate its unmet housing needs. Therefore:

- 1.2.1 We appreciate you are working hard to reduce any housing gap and fully explore delivery options inside London's boundary, but ask for confirmation of the expected scale of any gap urgently. This is vital to understand possible impacts on the South East and other areas outside London, and to inform the policy approach needed in the London Plan to ensure the Mayor has achievable proposals to bridge any gap. We also reiterate our call for the Mayor to undertake review of London's Green Belt if there is unmet housing need, like councils in the South East are already doing. Without this action, it will be harder for WSE authorities to consider any requests from the Mayor to take some of London's housing shortfall.
- 1.2.2 South East councils urgently need to see the evidence that quantifies the housing gap – including the SHLAA and SHMAA – and the Mayor's justification if he is not considering London Green Belt review despite there being a gap. As well as this detailed evidence, it would also be helpful to have a summary of London's approach to minimising any gap within London for circulation to our member authorities.
- 1.2.3 Clarification is also needed about what impact forthcoming new Government housing need methodology (outlined in the recent White Paper) will have on any expected housing gap and development of the London Plan.

## **2. Clarification of the Mayor's approach if willing partners for growth are needed outside London.**

- 2.1 We welcome your efforts to accommodate as much as possible of London's housing need within the Mayor's boundaries. However if a gap remains and you propose to look beyond London to address this, our members have stressed that any work with councils outside London to help accommodate growth must be on the basis on 'willing partners' and mutual benefits. Given the South East has its own similar pressures on housing, protected-land, transport and wider infrastructure, it would be wrong to *assume* there is capacity to take overspill.
- 2.2 As discussed at the meeting on 21 July, there may be some willing partners in the South East but they need to be clear what London would want and what benefits they would see in return for helping accommodate additional new homes.
- 2.3 We appreciate your emerging 'WSE and beyond growth area' policy attempts to put your approach to find 'willing partners' into practice. However as highlighted at the meeting, the current draft raises concerns with SEEC and many of our member authorities. *We want to see the policy refocused to centre on a 'call' for council partners that is underpinned by a clear and transparent approach to all local authorities who may be interested in working with you.* Key points raised at the meeting include:
  - 2.3.1 The proposed policy focus on the 13 WSE priority transport schemes/corridors as initial areas for GLA to seek willing growth partners is of great concern and should be removed. This is not the purpose of the 13 transport schemes, which were not agreed by PSG as growth corridors for London's unmet housing needs – they were selected as corridors in need of investment to meet existing demands. While some of these areas may be willing to support London growth, others do not have capacity. There may, however, also be councils outside these scheme areas who would want to speak to the Mayor about possible deals for accommodating London's overspill housing.
  - 2.3.2 Therefore, as we discussed at the meeting, we are keen you consider an *alternative approach* for this London Plan WSE policy that:
    - Removes the geographic areas of search.
    - Sets out clearly what the Mayor is asking for and offering (eg. types of housing, new infrastructure investment, sorts of employment/business that might be relocated from London to South East etc) to willing growth partners outside his

boundary. This way potential partners can see if there could be mutually beneficial outcomes, supporting local economic and other growth ambitions.

- Includes a 'call' for interested councils to come forward to discuss being a 'growth partner' with London.
- The policy should also make it clear that responsibility remains with the Mayor/London to resolve any remaining unmet housing need – this is important to avoid speculative developers arguing for South East Local Plans to pick up London's overspill in an ad hoc way, undermining South East councils' growth strategies.

2.3.3 To support ongoing collaboration, we ask for regular updates about which councils the GLA/Mayor is speaking to as prospective willing partners outside London, and what progress has been made so far in securing deals with them. We would also be happy to explore how we might raise awareness of your call for growth partners with our members if you are able to provide us with a clear statement on what London wants/can offer?

2.4 It will also be important the Mayor's emerging Transport Strategy (MTS, which SEEC will be responding to) approach aligns with the emerging London Plan and the point made above in para 2.3.1. It is welcome that the MTS includes references to the initial WSE priority transport schemes. But as highlighted at the PSG meeting, these were agreed to support existing economic and growth plans – we therefore ask for your confirmation that the MTS maps will be changed to remove reference to these as possible growth corridors for unmet housing need in London, to avoid prejudicing London Plan development/consultation. It will be important that the MTS, and the London Plan, make clear these transport investments are intended to deliver mutual economic benefits for the South East as well as London, and relieve existing congestion - also encouraging more 'self-sufficient' areas outside London, reducing travel which could assist the Mayor's transport strategy aims.

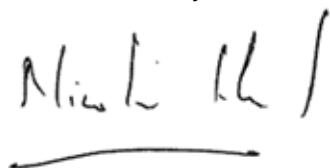
### **3. Ongoing collaboration, including the opportunity to comment on further iterations of London Plan Wider South East policies prior to formal consultation**

3.1 Following PSG discussions in March about the importance of the London Plan reflecting a collaborative approach with WSE partners, we appreciate your amendments to the 'WSE policy' to date which aim to reflect this more fully.

3.2 Members have welcomed opportunities so far to comment constructively on the GLA's outline London Plan policy wording on WSE issues, and we are keen to maintain constructive engagement. **We therefore ask for the opportunity to see and provide any further comments on the revised full WSE policies/supporting text wording, prior to the consultation draft London Plan being finalised. We believe it is particularly important to have this further opportunity to comment once we are all clear on the scale of any expected housing gap.**

We look forward to a swift response on these important issues, and confirmation of when you will be able to let us see the figures for any housing gap/evidence, and the revised full WSE policies/supporting text.

Yours sincerely



**Cllr Nicolas Heslop**  
**Chairman, South East England Councils, and Leader, Tonbridge & Malling Borough Council**