

Response to the Planning White Paper from the Wider South East Strategic Planning Network

Proposition for a New Planning Body for London and the South East

Introduction

- 1 The London and Wider South East Strategic Planning Network was established three years ago, as a group of strategic planners, both in practice or in academic institutions, who were concerned at the lack of a framework for a city regional approach to the planning of London and the wider South East of England, which is a functional urban region. The network was established and chaired by Duncan Bowie (and until the end of 2019 Corinne Swain) and Arup provide support for it in terms of hosting meetings and as a contributor through Christopher Tunnell of Arup. The network meets regularly and has a website. Membership published statements and a range of research materials are available at: <http://wseplanningnetwork.org/> The network would be happy to contribute to further discussion of the issues raised in this response.
- 2 This response to the Planning White Paper from the Network relates solely to the issue of planning for the London city region. Network members will have contributed to responses from their individual organisations on other aspects of the Government's proposals. As a network we are concerned at the absence of specific proposals for the strategic planning of the London city region and the proposals to terminate existing arrangements, such as the Duty to Co-operate provisions of the 2011 Localism Act, and the current soundness test for Local Plans which includes the requirement for a Statement of Common Ground with neighbouring planning authorities.
- 3 We note the statement in para 2.19 that "*further consideration will be given to the way in which strategic cross-boundary issues, such as major infrastructure or strategic sites, can be adequately planned for, including the scale at which plans are best prepared in areas with significant strategic challenges.*" We also note reference to a potential role for Mayors of combined authorities in the proposed new infrastructure levy in para 4.14 We however note the absence of any other references to the strategic planning role of the Mayor of London or the London Plan or to the Ministerial encouragement in his letter to the Mayor of 13th March 2020 to the Mayor to work with neighbouring planning authorities to develop a city region planning framework. We note the White Paper's invitation to respondents to put forward positive proposals. This is the purpose of our response.

Proposition for a New Planning Body for London and the South East

- 4 Our Proposal is for a Joint Planning Advisory Unit for the South East and London, formed as a Committee supported by a technical secretariat. Its role would be advisory to Government, to constituent authorities and combined authorities in the new system of plan making. Its purpose would be to:

- Advise on the requirements and spatial framework for growth in south east England, including the distribution of overall housing requirements to combined authorities and Unitary Council areas. The advice would be agreed with regional stakeholders and submitted to Government within agreed timescales (so that Government could indicate its approval and/or issue formal guidance).
 - Support constituent/combined authorities in addressing other strategic cross-boundary issues such as major infrastructure, strategic sites, waste planning etc.
 - Help develop tools that councils can draw on in preparing plan policies and zoning to help deliver strategic objectives.
 - Have strong research programme and capability, backed by adequate funding to investigate spatial economic development trends and strategic infrastructure requirements. This could, for example, include the impact of Covid-19, in terms of outward migration from London and the way operation of the housing market is evolving.
- 5 The approach is explicitly framed within the context of current policy direction including the Planning White Paper and forthcoming devolution White Paper.
- 6 The primary purpose would be to provide frameworks and other support for the preparation of local authority development plans and combined authorities strategies, and the London Mayor’s Spatial Development Strategy, known as the ‘London Plan’. It would be bottom-up, meeting needs articulated by – and accountable to - the authorities responsible for plan-preparation. As such it would be relatively easily adaptable to the kind of reworked planning system presaged in *Planning for the Future* and provide a valuable resource and sounding board for both national and local government in implementing a new system.
- 7 The Committee’s framework would also provide the spatial framework for other strategies and programmes. These include the transport plans and those for economic development.
- 8 A joint unit could also provide advisory/support services for councils experiencing difficulty in plan-making and in moving from the current system to a new one – providing training, exchanging best practice etc. It could draw on the breadth of its membership to secure better value in commissioning tech and other services. It could also provide central government with a sounding board on implementation of a new system

Remit of the Committee and Secretariat

- 9 To support the planning and delivery of growth in line with National Policy and the principles of sustainable development, social and economic wellbeing and to ensure work to contribute towards the mitigation of/and adaptation to, climate change, in the

United Kingdom.

- 10 To co-operate with, or facilitate or co-ordinate the activities of other bodies concerned with economic growth, investment, transport, infrastructure including digital infrastructure, housing, energy, waste and water, health, social care, environmental protection, heritage, green and blue infrastructure, landscape protection, social exclusion and equality of opportunities, and sustainable development to ensure an integrated and properly-evidenced approach to policy-making.
- 11 Provide research, information, intelligence and strategic advice on a regional or sub regional basis that is consistent with National Policy and in support of development and monitoring of:
 - economic recovery and growth;
 - economic development and industrial change;
 - demographic changes, including patterns of migration
 - spatial development and land use trends;
 - housing need and affordability;
 - social wellbeing, including patterns of deprivation and spatial inequality;
 - transport and access;
 - infrastructure needs and constraints;
 - environment considerations; and
 - needs for climate change mitigation and adaptation.
- 12 A key role for the work of the Committee and technical secretariat would be the production of a spatial framework including details of the spatial distribution of housing numbers including, perhaps, providing advice to Government on setting the binding housing requirement figure for each LPA. In relation to the latter it would be an alternative to the suggested formula suggested by the Planning White Paper (under Proposal 4 of Pillar 1) but could be based on a similar remit to address affordability and meet housing need.
- 13 A key issue would be the interrelationship between London and the rest of the region, reflecting the increasing challenges to meeting housing need within the capital, the role of Greenbelt (and other land constraints), the relationship of home and work and commuting needs, provision of transport and other infrastructure and the need for well-planned and sustainable development including major new settlements. It would also take account of the influence of Covid on longer term patterns of home and work and the likely growth in working from home and what this might mean for patterns of migration.
- 14 In practice the allocation of such housing numbers would be set in a much broader strategic context including an overall vision for economic growth and addressing issues such as infrastructure planning, the coordination of major settlement and growth proposals, as well as the issues addressed by the above strategies.

Justification

- 15 The housing need and economic potential of London and the south east as a world city region is accepted and it is a national imperative to find sustainable solutions that support/deliver this growth as part of national policy, regardless of the effect or potential of any wider UK levelling up agenda. About half of the current national requirement of 300,000 homes per year would need to be met in the WSE. WSE delivery would also need to be supported by commensurate levels of infrastructure investment. There is also an intra-regional levelling up issue as well as an inter-regional one.
- 16 Under the proposed new National Housing Need methodology the area covered by this proposal would be responsible for delivery of 171,789 homes pa – 57% of the national target. This scale of delivery will require a collective response and resources over and above what would be practicable (or cost-effective) by individual councils or even combined authorities.
- 17 London is the major engine of the south east and UK economy and has experienced by far the highest rate of jobs growth in the past 20 years. However, London has struggled to meet the housing needs of this growth and long term housing delivery rates in the capital have been around 30-40,000 homes per year, far short of unconstrained need. The suggested revisions to the formula in the recent Consultation Paper *Changes to the Current Planning System* would result in a need figure in excess of 90,000 homes¹ which seems unrealistic given the limits of land and density and effect of Covid. Existing capacity-based housing targets for London are below assessed housing requirements and the Secretary of State has stated that the Mayor of London must produce and deliver “a new strategy with authorities in the wider South East to offset unmet housing need”. Without a strategic mechanism to allocate the excess need, most likely to the rest of the south east, the excess need of 50-60,000 homes will fall between the cracks, meaning that the 300,000 national target may still be beyond reach and with severe social consequences in terms of affordability and overcrowding, etc. as well as pressures on the Green Belt.
- 18 The strategies of the past decade for the south east have tended to rely on the incremental expansions of existing settlements and using capacity in existing infrastructure and there has been only limited investment in strategic and local infrastructure to support housing growth. One of the biggest challenges from this approach has been the difficulties in finding sustainable and deliverable growth locations with the capacity to support growth, particularly at scale. The emphasis on urban extensions has also been controversial, particularly with an increasing emphasis on smaller settlements in rural settings. This type of approach has reached or is reaching its limits, particularly in the light of the scale of development envisaged by the National Housing Need methodology. There is a clear need for some sensible planned growth including new settlements and other growth areas. The potential of this strategic approach is demonstrated by the past success of growth areas such as

¹ 93,000 based on Lichfield's estimates

Milton Keynes and Thames Gateway and by the emergence of the Oxford Cambridge Arc. In many cases this is a bigger issue than can be addressed by proposed unitary or combined authorities.

- 19 Neither the immediate changes to the housing formula proposed in *Changes to the Planning System* which propose to remove the 40% cap in the current formula, or the White Paper proposals that suggest that a new formula will take account of land constraints such as Green Belt or AONB. In this sense the proposition provides an alternative approach. In the case of proposals to remove the cap the main effect will be in London where affordability is worst and increasing housing provision at the kind of scale the methodology suggests is unrealistic. In relation to the White Paper proposals encapsulating constraints into a formula, doesn't seem workable as these constraints are not typically absolute and their significance varies by location. Not all Green Belt is equal or consistently designated and while the need for general protection may be understood, boundaries will need to be subject to review. There are rather a lot of authorities in the south east where land beyond built up areas is almost entirely Green Belt and reducing growth in these areas and restricting development is unrealistic and incompatible with the 300,000 target and a balance needs to be struck. In addition, there are a range of other constraints which directly affect development in 'unconstrained' areas because of their wider impacts, notably in relation to Habitats/Natura sites which are the subject of international obligation and where formal assessment proposal by proposal is required to understand the constraint. Any review of development capacity within the Green Belt, both within and beyond the London boundary needs to be undertaken as part of a region-wide assessment of residential development capacity rather than as a separate exercise.
- 20 The South East Region is particularly sensitive to the effects of climate change. The need for mitigation and adaptation for climate change requires some strategic redistribution of growth across the south east and or extensive mitigation measures on flood risk.
- 21 The close interconnectivity between London and its hinterland should be reflected through joint policy approaches where appropriate. This is particularly important in sub-regions and transport corridors which cross the London boundary, for example the Lea Valley, Thames Gateway, the Thames Valley and orbital routes around London.
- 22 It's not just about housing! There is a need for cross-boundary consideration of:
 - Industrial and other employment land to meet the need for land for uses like logistics on a sub-regional/regional scale. Many of the sectors involved are evolving rapidly and a strategic capacity to provide intelligence and a forum for discussion of cross-boundary substitution would be valuable.
 - Town centre uses. Even after changes to the Use Classes Order there will be a need to understand trends across the area in retail and other town centre uses so

councils can understand how much land should be allowed for these uses (and how much might be releasable for housing and other uses).

- Strategic transport and other infrastructure, providing a forum to agree infrastructure need and find innovative ways to fund and deliver it, ensuring delivery is appropriately phased to support planned housing and other growth.
- Waste, co-ordinating the planning of waste management within London and the south east including the coordination of a joint evidence base for use as a starting point for preparing plans and policies by identifying possible future needs for waste and recycling facilities. This could incorporate the existing South East Waste Planning Advisory Group (SEWPAG).
- Minerals, providing a mechanism to coordinate maintain an appropriate supply of minerals to meet construction needs. This reflect the long term reduction in supply of traditional land-won sources and the increasing importance of imported and marine-dredged material and the need for an efficient scale of operation in terms of port facilities, strategic river wharves, railheads and depots.

Possible Geography and Constitution

- 23 The suggested geographic area would be based on the Greater London area and the areas covered by the current shire county, unitary and district councils for Bedfordshire, Berkshire, Buckinghamshire, East Sussex, Essex, North Hampshire, Hertfordshire, Kent, Oxfordshire, Surrey and West Sussex.
- 24 The form of the Committee would need to reflect the structure of local government and any reorganisation that takes place as a result of the anticipated Devolution White Paper as well as any transitional arrangements. One widely suggested future model outside London is of a single tier of large unitary authorities, possibly based on County boundaries, clustered under a series of sub regional combined authorities. However, another might see the retention of districts, as well as more hybrid structures for different areas. This uncertainty means that are number of options in terms of representation may be possible and that any firm proposals would need to be established once these are known.
- 25 Assuming combined authorities did emerge then the Committee could comprise the elected mayors of the new Combined authorities together with the Mayor of London. This committee could aim to work by consensus and would have a chair elected by the mayors. This is on the assumption there would be 10-15 elected Mayors.
- 26 Representation would also be likely to be needed from future planning authorities whether these are new unitaries or districts, as well as the London Boroughs. This is important because it is this tier which holds much of the key local data and perspectives which would need to feed into strategy development. This tier of local government also provides the main means of delivery and past experience suggests

that they would need to be involved and on board to ensure overall success and early implementation. This could be by direct representation (e.g. by Leaders or Planning Portfolio holders) especially in a transitional phase and in the absence of combined authorities. Alternatively, or in the future, alongside any 'Committee of the Mayors', there could also be a wider consultative committee comprising the leaders of the south east local authorities or their nominees (e.g. planning or growth portfolio holders).

- 27 On the assumption that some consolidation of districts outside London will take place, it is assumed that there would be between 50 and 60 constituent authorities including the 33 London Boroughs and up to about 25 or so other unitary authorities. This committee might have sub-groups by topic or by area.
- 28 There would also be a technical advisory group comprising of technical lead officers of constituent authorities, together with a range of other technical advisors drawn from academia, the private sector and other third sector technical bodies.
- 29 The technical secretariat would be self-standing and formed either as a freestanding corporate body (created by statute) or as a jointly funded and managed body from London and constituent authorities.
- 30 The arrangements would ideally be created through new legislation to give the Committee statutory status. The style of working would be envisaged to be collaborative with Government and with south east authorities and other stakeholder groups – and with other regions.

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