

Sadiq Khan (Mayor of London)
New London Plan
GLA City Hall
London Plan Team
Post Point 18
London SE1 2AA

1 March 2018

Dear Mayor Khan

Suffolk Response to the Draft London Plan Consultation

Introduction

The Suffolk Growth Programme Board (SGPB) welcomes the opportunity to respond to the Draft Spatial Development Strategy for Greater London – the draft London Plan. As a joint board, representing interests across both the public and private sector and with the aim of facilitating and delivering inclusive growth throughout Suffolk, our response reflects the views of our districts, boroughs and county councils and other public sector partners.

The draft London Plan recognises the role and integration of local economies and has been prepared with consideration of wider housing and economic factors. The SGPB, and in particular the local authorities in Suffolk, appreciate the work that the Greater London Authority (GLA) has undertaken and look forward to further engagement as the plan is implemented and monitored.

The draft London Plan is ambitious and, if delivered, could achieve positive outcomes for both London and Suffolk. The Mayor of London’s vision to secure “good growth”, the recognition of the 13 initial strategic infrastructure priorities, and the delivery of more genuinely affordable homes are principles worthy of support. Like London, investment in and the delivery of infrastructure to support new jobs and homes in Suffolk is key to sustainable and inclusive growth.

The nature of how the Mayor will identify and work with “willing partners” is a key aspect and one that needs to be developed further with elected representatives from authorities within the Wider South East (WSE), including Suffolk. Clarification is needed on London’s intentions regarding longer term approaches to growth, the relationship to monitoring and timeframes.

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At the WSE Summit on 26 January 2018, the Mayor reiterated his commitment to work with willing partners, stressing that the GLA aims to explore with councils how to work better together and address concerns that London simply wants to export its problems and challenges. The recognition by the Mayor in his draft Economic Strategy and in the draft London Plan that the WSE has overlapping economies and his desire to build stronger economic partnerships is welcome.

Housing

The recent review of migration research undertaken by the London School of Economics¹ (LSE) highlights the wide extent to which the migration flows from London affect areas, such as Suffolk, that are not the capital's immediate neighbours. Suffolk is not only a recipient of direct moves from London but is affected by a complex chain of movements, whereby an external demand to move into an area stimulates some existing residents to move on and further out. The LSE's review also highlights how London attracts younger people, particularly graduates.

The LSE's review also highlights that there is no precedent of London having delivered enough housing to meet its identified need within the capital's boundaries. Its population has grown, however, as people have accepted living at higher densities. The London Plan rightly focuses its attention towards meeting its need through higher densities for new development but increasing densities within existing housing is also likely to contribute to meeting need. The emphasis on delivering developments at greater densities is a key component of the draft London Plan and to achieving the aim to make sufficient provision to accommodate the projected growth within London.

It is unclear how the Mayor will ensure living standards are still maintained and do not lead to overcrowding where existing housing continues to accommodate higher densities, and how the challenge of London's housing need might be impacted if people, such as recent migrants from poorer countries, cease to accept higher densities.

Whilst the draft London Plan goes up to 2041 and contains an ambitious 10- year housing supply, it is less clear across the policies what will happen with housing in the longer term. Furthermore, it is unclear what the intentions are with regard to the annual shortfall of 1,000 homes between identified housing need and housing supply.

Given the scale of the challenge ahead it would seem prudent for the GLA to plan for the possibility of failure to deliver and the Plan is not as clear as it might be in terms of what would happen were failure to materialise. Monitoring the relationships between delivery of the draft London Plan alongside indicators such as actual migration flows and commuting now appears to be a critical feature and one which authorities in Suffolk would wish London to consider further.

The application of higher accessibility standards, alongside the application of the national space standard, is a commendable approach to addressing an ageing population.

¹ LSE (2018) Review of Research on Migration Influences and Implications for Population Dynamics in the Wider South East <http://www.eelga.gov.uk/news/wider-south-east-migration-review-published/>

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Economy

Suffolk's economic relationship to London is recognised in the Economic Strategy for Norfolk & Suffolk published in 2017, which was coordinated by New Anglia LEP. Ipswich's 60-minute rail connection to central London is a significant asset, as is our connection to Cambridge, which is part of the Felixstowe-Nuneaton/A14 corridor. Like London, financial services are also a major driver of our economy and digital technologies is a key sector for growth. By way of example, all authorities in Suffolk are partners in [TechEast²](#) and reinforcing linkages with London is a shared aim of this initiative.

It would be helpful if, as part of the London Plan, the Mayor of London set out activities related to aligning economic development opportunities alongside those undertaken by local authorities and Local Enterprise partnerships. This might include drawing on current activities such as between Tech City and TechEast. There are economic advantages to a wide range of businesses from being in Suffolk. These advantages could also apply to those businesses who might be in, or look towards, London but the potential for such advantages needs to be explored further.

The LSE's review of research noted the relationship between London's employment growth and commuting and highlighted that managerial-technical occupations account for over 75% of net commuting into London and the entire growth in net inward commuting between 2004 and 2016 (LSE, page 78).

The draft London Plan places the potential for Stratford to act as a satellite for major office space but only after demand has exceeded the capacity of the Central Activity Zone and the Northern Isle of Dogs. The London Plan should be setting a positive framework to facilitate development and this hierarchy should not restrict the potential for "good growth" to occur in these satellite locations even if there is capacity within the other areas.

Policies within the draft London Plan (E5, E7 and E8) refer to the potential of relocating some employment to the Wider South East Region and collaborative working with authorities outside London on this matter. At the Wider South East Summit, the Mayor referred the Royal Opera House's linkage to Thurrock and the Deputy Mayor agreed to joint research on the location of firms. Councils in Suffolk welcome the recognition of the wider economic aspects and that London's policy and evidence base reflects on the office and industrial markets in the Wider South East.

The protection afforded to secondary materials and waste management in policies E4 and E5 is welcome and benefits the vitality of the wider waste supply chain but, in order to link with the safeguarding policy on aggregates (SI10), reference should also be made to aggregates within these policies.

² TechEast is a private/public partnership working to promote opportunities for economic growth in digital technologies in the East of England

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Transport

In illustrating London in its wider regional setting the Plan identifies the 13 WSE Strategic Infrastructure Priorities. The radial rail connection to London, which includes Stowmarket, also serves branch lines towards Lowestoft, Newmarket, Felixstowe and Sudbury. The strategic role of the A14, the Felixstowe-Nuneaton railfreight route and the interaction with East-West connections to Oxford are welcome. Whilst authorities in Suffolk support the Plan's recognition of these routes, it should not be assumed that they are all locations for growth as implied by the current wording within the Plan.

In order to achieve the Mayor's ambitions in relation to upgrading of rail freight routes, which is especially relevant to the growth at Felixstowe Port, and improvements to surface links to airports, the Mayor of London is asked to collaborate with councils in Suffolk and wider partners to make the case for expanding road and rail capacity both within and outside of London. We look forward to working in partnership with London on securing investment into these critical routes and indeed our recent submission to the DfT's Strategic Route Network Initial Report seeks funding for upgrades on the A14, A11 and A12.

Commuting to London has a high profile in the draft plan. Given the expected growth in office-based employment (24,772 jobs per annum; 64% more than the current adopted plan), and as most of this increase (288,800) will occur in the Central Activity Zone, there is a reasonable expectation that commuting from areas such as Suffolk will increase. As a result, major improvements to rail infrastructure, stations and associated facilities will be necessary. For example, Network Rail's *Anglia Route Strategy* has identified the need for increased platform capacity at London Liverpool Street.

Waste

Suffolk works with other Waste Planning Authorities (WPAs) in the East of England. Whilst the draft London Plan aspires to self-sufficiency, the Plan contains a number of very ambitious policies, but the vagueness of the wording used makes it difficult to monitor how waste is actually treated in London. A key priority should be around ensuring the delivery of these ambitious targets, which councils in Suffolk would support.

I hope that the above provides you with a better understanding of the position of partners within Suffolk and look forward to working further with you to address matters of common interest.

Yours sincerely



Stephen Baker
Chair of Suffolk Growth Programme Board

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