


Maidstone Borough Council

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Sadiq Khan (Mayor of London)

New London Plan

GLA City Hall

London Plan Team

London SE1 2AA

By email only to londonplan@london.gov.uk

Dear Mr Khan

Draft London Plan

Thank you for giving Maidstone Borough Council the opportunity to comment on the draft London Plan. This response was agreed by the Council's Strategic Planning, Sustainability & Transportation Committee at its meeting on 6th February 2018.

Housing Needs.

The Council notes that there is a requirement for some 66,000 dwellings/year to be provided in London, adding up to 660,000 dwellings for the 10 year period 2019 - 2029. This figure emanates from the GLA-prepared population projections used in the SHMA (2017), rather than the nationally consistent Sub National Population Projections (SNPP) prepared by the ONS.

Further, Policy SD2(D) – Collaboration with the Wider South East states that the Mayor supports the recognition of long term trends in migration in the development of Local Plans outside London. The text of the Plan confirms that the GLA has prepared demographic projections for the whole of the UK to take account of cyclical changes to migration from London (paragraph 2.2.9). The Plan also states that the Mayor will use this demographic data, which takes account of long term trends, when making representations on emerging Local Plans (paragraph 2.3.2).

This approach is at odds with that followed in the rest of the country for calculating Objectively Assessed Needs which uses the ONS' SNPP as the starting point. Significantly, the SNPP will also be the central component of the new standardised methodology for calculating objectively assessed needs which the Government intends to introduce. The

Government's objective is to reduce the debate around the setting of OAN figures. The promotion by the GLA of different figures for authorities both within and outside London would conflict with this clear Government objective, could cause confusion and be counterproductive to efficient plan making in the wider South East and beyond. The approach in the Draft Plan should be revised to take account of the Government's intentions to achieve a consistent and straightforward approach.

Housing requirements (targets)

The Council welcomes the statement that the Plan aims to accommodate all the projected growth within London's boundaries (paragraph 2.3.1).

The London Strategic Housing Land Availability Assessment (SHLAA) indicates that there is capacity for some 65,000¹ additional homes/year and this is reflected in the individual borough housing targets set out in Table 4.1/Policy H1 of the Plan. This is a shortfall of some 1,000 homes/year compared with the expressed annual need and the Plan does not appear to identify how this shortfall will be addressed. The Plan should rectify this. As a minimum, the targets in Policy H1 should be expressed as minimum targets.

Substantive measures will be required for the individual boroughs to be able to meet their targets. The scale of the challenge is illustrated by the fact that the 65,000 annual requirement is itself a substantial uplift from the target in the previous London Plan² of 42,000. The SHMA (2017) confirms that delivery reached only 34,800 in 2015/16³.

In this respect, the Council supports 'Policy GG2 – Making the best use of land' which, amongst other things, requires those involved in the development process to prioritise brownfield opportunities and explore the intensified use of land to create high density, mixed use places. Support is also given to Policy D6 – Optimising housing density which requires proposals to make the most efficient use of land and be developed at optimum density.

The draft Plan's more restrictive approach to releasing employment land for alternative uses places significant limits on this potential source of housing supply. The Plan indicates that existing viable office floorspace capacity in outer and inner London locations should be retained and supported by article 4 directions to remove office-to-residential permitted development rights where appropriate. The change in approach would protect offices but parts of London have experienced loss of office to residential development from permitted development rights. Therefore the approach will also potentially worsen the capital's ability to provide homes (particularly lower cost homes) placing further emphasis on displacement to outer London and beyond.

The draft Plan also includes a general principle of no net loss of industrial floorspace in designated strategic industrial locations and locally significant industrial sites. The Plan adds that any release of industrial land for housing or other uses would have to be through a defined process, including co-locating industrial and residential uses on sites. Without the release of this land, the delivery of new residential development could be severely constrained and it is important that a balance is struck.

¹ Rounded from 64,935

² Further Alterations to the London Plan (2015)

³ Latest year available (SHMA (2017))

According to the NPPF, Local Plans should preferably have a 15 year time horizon and identify specific housing sites and locations sufficient for at least 10 years. With finalisation of the London Plan in 2019, this gives individual London boroughs little prospect of getting their Local Plans adopted in time to secure a 10 year time horizon for housing land supply ending at 2029 and thereby ensuring their own plans confirm with the NPPF. If an individual London borough wants to plan for a longer time horizon it will presumably have to estimate its own targets for the period post 2029, introducing uncertainty and additional areas of challenge to the Local Plan making process. To address this, and to provide the appropriate strategic framework for future Local Plans, the housing targets in the draft London Plan should extend to at least 2031 to take account of Local Plans' preparation time.

Green Belt policy

The Council does not support the London Plan's apparent moratorium on the de-designation of Green Belt in Policy G2. The Plan's justification for this is that the Green Belt performs multiple beneficial functions for London including combating urban heating, growing food, providing recreational space and limiting further built expansion. Only the last of these – restricting urban sprawl – matches a purpose for the Green Belt as defined in the NPPF. The NPPF is also clear that it is for Local Plans to consider and justify alterations to Green Belt boundaries. London boroughs preparing their Local Plans would be expected to determine how housing needs should best be met, including through an objective Green Belt Review to identify any parcels of land which do not meet the 5 purposes of the Green Belt sufficiently and which could be developed sustainably. The Green Belt coincides with the outer London boroughs whose housing targets are substantially increased compared with the latest iteration of the London Plan.

Authorities elsewhere in the South East have had to critically consider Green Belt release in order to meet their own objectively assessed housing needs. The Council does not agree that this option should be closed to the outer London boroughs as a matter of principle, particularly when the scale of the housing challenge is so great.

Affordable Housing Needs

The SHMA (2017) identifies that in recent years there has been a very low supply of affordable housing in the capital which has contributed to rising numbers of households who are either homeless or 'concealed' due to living as part of another household. Homelessness and rough sleeping have all increased sharply in the last five years, though there are recent signs that this growth may be levelling off.

The past under-supply of affordable housing in London, coupled with increasing house prices, places inevitable upwards pressure on housing in the surrounding authorities in the South East. More specifically, some London boroughs appear to be pursuing a policy of relocating housing clients to properties in authorities outside London where rents are cheaper. This can mean that more vulnerable households are separated from their families and support networks and additional pressure is placed on local community services.

The SHMA (2017) concludes that there is a need for approximately 65% of the future annual housing supply to be affordable (47% social rent/affordable rent and 18% intermediate tenures), equating to 43,500 affordable homes/year.

Policy H5 of the draft Plan sets a strategic target for 50% of all new homes to be delivered across London to be affordable. An omission from the Plan is how the 15% shortfall is to be bridged if affordable housing needs are to be met in full in accordance with NPPF paragraph 47. The prospect of under-provision is further compounded by the fact that the Opportunity Areas may have more relaxed housing targets. This needs to be addressed.

Gypsies and Travellers

Policy H16 of the draft Plan proposes a different definition of Gypsies & Travellers for the purposes of planning within London, more expansive than that set out in Planning for Traveller Sites (PTS) to include those who have permanently ceased to travel. This is due to concerns that the Government's definition of Gypsies and Travellers fails to recognise the needs of many ethnic Gypsies and Travellers, namely those who have ceased to travel permanently, those who live in bricks and mortar and those who are no longer travelling because of education, health or old age. The Plan states that results in Gypsies and Travellers not being counted in needs assessments.

The Council supports that Policy H16 directs that the London boroughs to plan to meet the need for permanent pitches in full but the council also notes that this different basis for assessing needs likely to be challenged if approaches are made under Duty to Co-operate to authorities outside London to accommodate unmet need.

Yours sincerely,



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