

Sadiq Khan (Mayor of London)
New London Plan
GLA City Hall
London Plan Team

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Date: 01 March 2018

BY EMAIL ONLY

Dear Mr. Khan,

**RE: SEVENOAKS DISTRICT COUNCIL RESPONSE TO THE PUBLIC CONSULTATION
ON THE DRAFT LONDON PLAN**

We would like to thank you for inviting us to comment of the draft London Plan. We recognise the role and importance of the emerging Plan in guiding and shaping how London develops and grows in the coming years. As a District authority which borders the Greater London area, we hope to be fully engaged as the Plan process evolves, to ensure the delivery of new housing, employment and required services and infrastructure across the Plan period.

With population increases forecast and house price affordability in London, Greater London will continue to have a significant impact on the Sevenoaks District, and the rest of the South East as a whole. Due to its high levels of constraints, it is highly unlikely that Sevenoaks District will be able to accommodate any additional housing from London. There will also be significant pressure placed on infrastructure, services and facilities, meaning that it important that these factors are taken into account and we welcome further cooperation on providing much needed infrastructure improvements.

Meeting London's Housing Needs

The Mayor has rightly recognised that the availability and affordability of housing is a persistent issue across the Greater London area. The London-wide Strategic Housing Market Assessment (SHMA) looks at the general housing need across the area, as well as providing details for further specialist accommodation, including student accommodation and housing for older persons housing in the overall need figure. The SHMA states that London has a housing need of 66,000 additional homes per year over the plan period (up to 2041). The London-wide Strategic

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Housing Land Availability Assessment (SHLAA) identifies that there is capacity to deliver 65,000 additional homes a year on a combination of large and small sites across the 32 London boroughs.

We support the Mayor's ambitions in trying to address London's housing needs within the London boundary. Any additional population flows into Sevenoaks District and the wider Kent County would put pressure on already stretched infrastructure provision and the increasing under-capacity of services, housing and SDC, like many other local authorities in the wider South East region, have accounted for the "London effect" within own population forecasts and housing need projections.

It is not helpful if there are differences in the methodology between the London SHMA and our SDC's own SHMA, considering that London falls short of meeting its housing need by 1,000 homes per year. While the shortfall is very small to meeting the housing need, there would still be a minimum shortfall of 20,000 homes across the course of the plan period and there is a question of how this could be met. Like many other South East local authorities with a border to London, there is already significant pressure on Sevenoaks District to meet as much of its housing need of 12,400 additional homes, especially with significant planning constraints (i.e. 93% Green Belt and 60% Area of Outstanding Natural Beauty).

Finally, the Government's recent consultation "Planning for the Right Homes in the Right Places" proposed a standardised methodology for calculating a local authority's housing need. This has resulted in a number of South East authorities seeing a significant increase ranging from 13% (Sevenoaks) to 128% (Medway). There is also a significant uplift in London Boroughs as well with Bromley seeing a proposed uplift of 123% and Greenwich seeing an uplift of almost 950% under the proposed methodology. We appreciate that the proposal of a standardised methodology is still in draft and will be as part of a revision to the National Planning Policy Framework (NPPF), there should be a recognition to potential national policy changes.

Duty to Cooperate and Cross Boundary Working

The Government has placed greater emphasis on local authorities working together to address any cross-boundary issues during the plan-making process. Under the Duty to Cooperate, local authorities should consult statutory organisations when producing Local Plans, while considering and identifying potential opportunities for meeting needs (i.e. housing, employment, strategic infrastructure and transport). We are encouraged to see that the draft London Plan identifies collaboration with the Wider South East as a priority (draft Policy SD2), as Sevenoaks District shares a large amount of strategic transport infrastructure including road and rail. Figure 2.13 highlights the strong economic relationship that Sevenoaks District has with Greater London, with one of the highest commuting patterns in the wider South East region. In addition, the Mayor's recognition of the Thames Gateway development area and the Lower Thames Crossing is also supported. While these proposals are not taking place within the Sevenoaks District, we recognise them as additional pressures, as well as opportunities, during our own Local Plan preparation.

Yet while the development of a strong working policy on Duty to Cooperate and collaborative cross-boundary working is encouraging, we believe that this needs to be followed with action now. From a wider Kent County perspective, we echo the views of the Kent Planning Officers Group (KPOG) in which there appears to be little communication or collaborative working between Kent and the GLA on large scale, strategic housing and employment or infrastructure issues. This must be addressed moving forward when identifying strategic, cross-boundary priorities with the wider South East.

At the local level, we as a Council share administrative boundaries with eight local authorities, which include the London Boroughs of Bromley and Bexley. We also share administrative boundaries with 3 County/Unitary authorities which includes the GLA. While we have had some engagement with both London Boroughs and the GLA during the course of our plan-making preparations, it has been rather inconsistent. The Planning Inspectorate has placed greater weight on the Duty to Cooperate element during a Plan's examination, with some Plans being found unsound at this first stage before other issues of the Plan are discussed. Due to the number of local authorities and partners that the GLA has to engage with, we would urge the GLA to continue proactive engagement with all stakeholders and build long-lasting relationships during the local plan-making processes.

Green Belt and Housing Need

The Mayor, through the draft London Plan, has expressed his commitment to protect the Metropolitan Green Belt from further development within the London boundary. This is a welcomed proposal as it demonstrates the Mayor's commitment to developing brownfield/previously developed sites across the capital. As a local authority with one of the highest proportions of Green Belt (93%) in the country, we endorse this approach of meeting the capital's housing need.

However, it is clear that the draft London Plan is planning for 65,000 additional homes a year which is just short of the 66,000 homes a year to meet the capital's need. This will result in a deficit of a minimum 20,000 additional homes across the Plan period. While there is a commitment to protecting the Green Belt, the policy G2 "London's Green Belt" appears to be more prescriptive than national policy and may reduce the ability of London Boroughs to plan their own delivery of homes to meet their own needs. As a result, local authorities immediately outside of the London could be expected to accommodate a higher proportion of housing in their own areas, which is not acceptable.

Last year, SDC consulted on its Local Plan Issues and Options document; the first stage in our plan-making process. The document set out our commitments to protecting the Green Belt from development by setting out our preferred approach of developing brownfield land in sustainable areas. This approach will be taken forward as part of our draft Local Plan consultation which will be consulted on in spring/summer this year. Details of our Issues and Options consultation and preferred approach to development in Sevenoaks District can be found at www.sevenoaks.gov.uk/localplan.

We trust that our views expressed in this response will be taken into account during this consultation exercise for the draft London Plan. We also welcome further engagement on any proposals that might affect Sevenoaks District while also welcoming further engagement from the GLA on our Local Plan proposals, and would like to extend invitations to further meetings to discuss any cross-boundary issues.

If you have any questions regarding this consultation response, please contact a member of the Planning Policy team on 01732 227000 or please email at planning.policy@sevenoaks.gov.uk.

Kind regards,

Cllr. Robert Piper
Portfolio Holder for Planning,