

MAYOR OF LONDON

Rt Hon James Brokenshire MP

Secretary of State for Housing, Communities and Local
Government
Ministry of Housing, Communities and Local Government
4th Floor, Fry Building
2 Marsham Street
London SW1P 4DF

Date: 28 AUG 2018

Alex James,

Thank you for your letter of 27 July. I am pleased that you share my sense of urgency in tackling London's housing crisis. I am keen to work with you constructively to ensure that we in the capital have the approaches, powers and resources we need to make a difference to Londoners.

Since becoming Mayor, I have made housing – particularly building more genuinely affordable homes – a top priority. In 2017/18 work started on more homes through my affordable housing programme than in any year since responsibility for housing investment was devolved to the GLA in 2012.

Alongside this progress, it is essential we have clear planning policies in place to identify the capacity for substantially more homes than have been built in London in recent years. That is why it is so important to make sure my draft London Plan is adopted, as it uses objective assessments of both housing need and capacity to establish an ambitious and evidence-based framework of where substantially more homes can be built.

I am therefore grateful that you took account of our representations in relation to the transition period of the Plan in the final National Planning Policy Framework (NPPF), and that you are supportive of my ambition to get a new London Plan in place as soon as possible.

Your letter, however, states you are not convinced that the need we have identified for 66,000 new homes a year reflects the full extent of housing need in London. This figure is the result of an assessment of need using demographic projections that have been proven robust, alongside a methodology that has been previously tested at Examination in Public and found sound, and accepted as such, by your Ministry.

While I note that the Government has consulted on a new standard methodology to assess need, I understand that the figures used in this new methodology are uncertain due to changes in ONS population and household projections.

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As you will be aware, the process for developing a strategic planning framework not only requires housing need to be identified, but for plan-makers to establish where and how this housing can be accommodated. The Strategic Housing Land Availability Assessment undertaken for this draft Plan was the most robust yet, with more sites assessed and a methodology used that sought to optimise capacity from all potential housing sites.

As such, my draft Plan uses all the potential sources of available housing capacity set out in the new NPPF: increasing densities around well-connected places; enhancing the role of small sites; and encouraging mixed use developments through intensification and co-location. The only available land we have not investigated is protected open space, which as Mayor I would not seek to bring forward for development. Please could you clarify whether you are suggesting that Green Belt and other protected green space should be a source of land supply for the purposes of the Plan?

A more fundamental point, however, as I have made to your predecessors and the Chancellor, is that London needs a step change in funding and powers to ensure we deliver – rather than just plan the capacity for – many more homes. Indeed, this is a central point being looked into by Sir Oliver Letwin, whose review of build out I have been pleased to contribute to.

You recently considered, and decided not to intervene in, my London Housing Strategy. This document sets out in detail the actions I will take, and the actions I expect others to take, to turn the housing framework established in the draft London Plan into real delivery. As the strategy sets out, the funding and powers available to me and the London boroughs are wholly inadequate when compared with the scale of the housing crisis we face. London receives a fraction of the investment in affordable housing that it needs, and investment in infrastructure and transport schemes, while welcome, does not come close to what is required.

London's boroughs and my office would welcome the opportunity to take on the powers and resources that would enable us to be fully accountable for the delivery of the housing London needs. We would be pleased to arrange discussions about how to ensure London can deliver 65,000 homes or more a year.

Your letter included only limited details of your wider concerns about the draft Plan. I would like to respond substantively and so I would be grateful if you could reply as soon as possible with more detail on the following points:

- I take the requirement to have regard to the need to ensure that the Plan is consistent with national policy very seriously. I do not consider the draft Plan to be inconsistent with current applicable national policy for the two examples you provide – development on residential gardens and car parking. Furthermore, neither your predecessor nor your officials raised car parking as an issue in their response to the consultation on the draft Plan. Please could you provide details of how you consider my draft policies on these matters to be inconsistent with national policy, and how you would like to see them amended? Your letter suggests that there are other areas which you consider are inconsistent with national policy, are you referring to my policy on hydraulic fracturing?
- You raise a concern about the detail and complexity of the policies in the draft Plan and suggest that it strays considerably beyond providing a strategic framework. However, you have provided limited detail on which specific policies, or elements of those policies, you are referring to. Are you, for example referring to areas the London Plan has not addressed before, such as the policy on banning new fast food takeaways from opening near schools?

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- You suggest that insufficient information is provided on how we will deliver against our aims, including through collaboration with boroughs and neighbouring areas. I would be happy to provide you with more details of how my officers have been working closely with London boroughs throughout the development of the draft Plan, and you may also be interested in our ongoing collaborative work with the Wider South East – details of which can be found here: www.london.gov.uk/about-us/organisations-we-work/policy-and-infrastructure-collaboration-across-wider-south-east. Do you have further concerns in this area?
- You raise a concern that there are polices in the draft Plan that seek to deal with matters relating to building standards and safety. From your ministry's response to the consultation on the draft Plan, I assume you are referring here to the policies I have included on fire safety. It is important that, by raising concerns, you do not inadvertently undermine my attempt to strengthen fire safety provisions through policies in the draft Plan. Please can you confirm that you support my efforts to use planning policy, in a manner that will complement building regulations once they are updated, to provide extra reassurance on fire safety for Londoners?

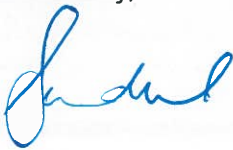
I am confident in the policy approaches I have taken in the draft Plan and that they have been tailored specifically for London. Clarification from you on the issues above would enable my officers and me to better understand your concerns.

The consultation on the draft London Plan received almost 4,000 responses, which my team have been analysing. I have proposed a number of minor changes to address issues raised in the consultation – these are non-material amendments that deal with matters of clarification and fact. I have carefully considered your Ministry's formal responses as part of this process, and my officers would be happy to talk your officials through the minor suggested changes and the extent to which they address your concerns.

The next stage for the draft Plan is the Examination in Public (EiP), which provides an opportunity for interested parties to raise any concerns they may have about the document. I expect that you will seek to raise the issues you mention in your letter at the EiP, and I would welcome your representations at the public meetings to ensure we can have a full debate.

In the meantime, however, I would suggest that you and I meet to discuss the draft Plan as soon as possible. I have made several requests to meet you since your appointment and am disappointed that a meeting has not yet been arranged. Given the nature of your concerns about the draft Plan, I hope that this can now be treated as a matter of urgency, and I would ask that your team contacts my Diary Secretary, David Hayward, by email at: david.hayward@london.gov.uk to make the necessary arrangements.

Yours sincerely,



Sadiq Khan
Mayor of London