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3 APRIL 2014

**CONSULTATION ON THE DRAFT FURTHER ALTERATIONS TO
THE LONDON PLAN**

1. Summary

1.1 The Mayor of London is carrying out a consultation on the draft further alterations to the London Plan prior to its submission to the Secretary of State.

1.2 This report identifies the issues impacting upon Dartford Borough and Appendix A suggests representations on the consultation document.

2. RECOMMENDATIONS

2.1 That the representation on the consultation document set out in Appendix A is submitted as the Council's formal response to the draft further alterations to the London Plan.

2.2 That an Officer continues to attend the South East England Councils (SEEC) and Greater London Authority (GLA) liaison meetings, with a view to representing Dartford Council views and those of other Kent authorities.

3. Background and Discussion

3.1. The Mayor of London is consulting on the draft further alterations to the London Plan (the Plan). The current version of the London Plan was adopted in July 2011. It is this version of the Plan that sets out the spatial development strategy for Greater London and forms part of the development plan documents for the 32 London Boroughs. The proposed alterations to the Plan are primarily to ensure that the London Plan is compliant with the National Planning Policy Framework and that it reflects the Mayoral priorities as set out in the '2020 Vision: The Greatest City on Earth- Ambitions for London'.

3.2. The alterations to the Plan are based on a range of new and updated supporting evidence. The most fundamental change to be addressed through the alterations to the Plan is the accelerated population growth in London, which is much greater than was anticipated in the 2011 London Plan. The 2011 Census recorded far higher population growth than projected and the trend-based growth projections have been updated to reflect this. These projections suggest that the population of London could grow by 91,000 to 106,000 per annum up to 2021, and by 64,000 to 88,000 over the term of the Plan to 2036. This suggests that on the basis of trend-based projections and assuming a continuation of current policies, there will be a need for new housing over and above that planned in the 2011 London Plan.

3.3. The National Planning Policy Framework (NPPF) requires that authorities determine the 'objectively assessed housing need' for their

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area and identify sufficient capacity to meet this need in full, unless there are constraints which prevent this. Any shortfall would normally need to be met elsewhere. The Greater London Authority (GLA) has assessed the need as being between 49,000 (2015-2036) and 62,000¹ (2015-2026) homes a year. The lower 49,000 figure, which covers the whole plan period, has been taken as the basis for the housing requirement figures set out in the Plan.

- 3.4. There is still a lack of clear understanding about how these figures are derived and whether they are appropriate. Further assessment of the evidence is needed and Officers consider it is best carried out as a shared exercise with other authorities. The South East England Councils (SEEC) is currently taking a lead and co-ordinating work on a response to the London Plan. A Dartford Officer has attended an initial meeting, with a remit to feedback to other Kent authorities. A Kent County Council Planning Officer is also to attend in the future.
- 3.5. The GLA's housing land assessment shows that over the period 2015-2025, London has the capacity to deliver at least 42,000 homes a year. This demonstrates a potential gap between projected need and supply of 7,000 homes a year, even where the lower 49,000 housing need figure is used. If the 2015-2026 housing need figure of 62,000 is used then this gap is increased to 20,000 homes a year. There would be pressure on the South East and East of England authorities to accommodate this shortfall.
- 3.6. The housing gap and ongoing under-provision identified in the London Plan effectively means areas outside London, especially the South East, could come under further pressure to take more development on top of existing substantial growth levels, which may be in addition to allowances already made for out-migration from London. This may lead to a range of increased demands on areas outside London, including housing pressure on employment land or protected land such as the Green Belt; infrastructure demands for utilities and transport; and increased need for council services.
- 3.7. The Council's regeneration strategy is based on employment growth, with housing supply brought forward in tandem to support the job creation, along with careful infrastructure planning to support this growth. The London Plan strategy appears to be one of continuing high density employment growth within London, with areas outside London providing a supporting housing supply. This increases the risk of Dartford becoming a dormitory for London's workforce, which could potentially undermine Dartford's locally-driven employment growth strategy by take-up of Dartford's labour supply by London, leaving a shortfall locally. There may also be pressure on land identified for employment uses to provide housing.

¹ The 2015-2026 figure is higher than the 2015-2036 figure partly to address the current backlog in housing supply.

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- 3.8. If London out-migration is above that already planned for in the Core Strategy then higher levels of development could result in overstretched infrastructure and pressure on the environment, which in turn could deter business growth and reduce residents' quality of life in the Borough. It is imperative that in bringing the updated plan forward, appropriate mechanisms are put in place to assess and mitigate the impacts arising from insufficient housing supply in the capital and the potential impacts of the housing shortage for the surrounding local authorities in the region, both in terms of sufficient housing capacity to meet London's housing need and infrastructure requirements.
- 3.9. At the present time, whilst the GLA has initiated a number of events to facilitate an understanding of the issue with local authorities in the South East, there is still uncertainty on how the figures have been derived and how the proposed shortfall would be accommodated. It is considered that there needs to be a two-way dialogue between London and the surrounding authorities, with surrounding authorities setting out their own aspirations more strongly. This can best be achieved as a shared exercise, currently being led by SEEC. Unlike other local authorities who have to co-operate when plan making to ensure a sufficient housing supply in the wider area, there is no legal duty on the GLA to cooperate in the same way with local authorities in the South East. Nonetheless, the GLA have opened up discussion with surrounding authorities and this opportunity needs to be fully exploited.
- 3.10. The proposed consultation response to the alterations to the London Plan is set out in Appendix A.

4. Relationship to the Corporate Plan

Not applicable

5. Financial, legal, staffing and other administrative implications and risk assessments

Financial Implications	None
Legal Implications	None
Staffing Implications	A robust input to ongoing discussions with the GLA and other affected authorities, as well as potential representation at a Public Examination into the London Plan will require a considerable use of staff resources. This may be accommodated within the existing staff complement but this will have an impact on other parts of the work programme.
Administrative Implications	None
Risk Assessment	No uncertainties and/or constraints

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6. Details of Exempt Information Category

Not applicable

7. Appendices

Appendix A - Draft further alterations to the London Plan consultation response

BACKGROUND PAPERS

<u>Documents consulted</u>	<u>Date / File Ref</u>	<u>Report Author</u>	<u>Section and Directorate</u>	<u>Exempt Information Category</u>
Draft further alterations to the London Plan, January 2014	12 March 2014	Melissa Cooper (01322) 343128	Planning Policy, Regeneration Directorate	N/A