

CABINET

3 APRIL 2014

Response on the draft further alterations to the London Plan

APPENDIX A

Section/ Paragraph	Background Information	Response
Chapter 1 Content and Strategy + Chapter 3 London's People		
<p>Pg11-18 Para 1.4-1.15c Pg85-91 Para 3.13- 3.26 (including policy 3.3 and Table 3.1)</p>	<p>Trend-based growth projections have been updated to reflect far higher than projected population growth in the 2011 Census. These projections highlight a pressing need for new housing.</p> <p>The updated Strategic Housing Market Assessment (SHMA) identifies a housing requirement of between 49,000 (2015-2036) and 62,000 (2015-2026) homes a year. The GLA has taken the lower 49,000 figure, which covers the whole plan period, as the basis for the housing need figures set out in the London Plan.</p> <p>The updated Strategic Housing Land Availability Assessment (SHLAA) shows that over the period 2015-2025, London has the capacity to deliver at least 42,000 homes a year; 7,000 less than the 49,000 housing requirement and 20,000 less than the 62,000 housing requirement.</p>	<p>Para 3.16b states that the 49,000 annual housing requirement in the SHMA provides the basis for the housing needs set out in the Plan and should be regarded as a minimum. Despite identifying the 49,000 annual housing target as a minimum, the housing capacity target identified in para 3.17a, Policy 3.3 and Table 3.1 is 42,000 homes per year.</p> <p>In addition, the use of the 49,000 figure as the housing need figure used for the 2015-2025 10-year delivery period is questionable, as the corresponding 2015-2026 housing need figure identified in the SHMA is 62,000. This highlights a far greater housing shortfall between the 42,000 identified and the 49,000 figure which is being used (a 20,000 homes per year shortfall as opposed to 7,000).</p> <p>There is a lack of clear understanding about how these figures are derived and whether they are appropriate. Furthermore, whichever figure is used, it does not appear that the GLA is identifying sufficient sites to meet their objectively assessed housing needs as set out in National Planning Policy Framework (NPPF) para 47 and accommodate London's forecast housing need. This puts pressure on the South East and East of England authorities to accommodate this shortfall.</p> <p>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.</p> <p>The adopted Dartford Core Strategy sets out the Council's regeneration strategy and is based on employment growth, with housing supply brought forward in tandem to support the job</p>

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		<p>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 employment land to provide housing.</p> <p>Further London out-migration could result in overstretched infrastructure and pressure on the environment in areas of the South East, which in turn could deter business growth and reduce residents' quality of life in Dartford and other affected areas. 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.</p> <p>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.</p> <p>Council's in the South East should not have additional housing need from London thrust upon them as a result of London not meeting its housing need. 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. It is considered that there needs to be a two-way dialogue between London and the surrounding authorities, which can best be achieved as a shared exercise between the GLA and authorities in the South East.</p>
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