

**TONBRIDGE & MALLING BOROUGH COUNCIL**  
**PLANNING and TRANSPORTATION ADVISORY BOARD**

**06 March 2018**

**Report of the Director of Planning Housing & Environmental Health**

**Part 1- Public**

**Matters for Recommendation to Cabinet - Non-Key Decision (Decision may be taken by the Cabinet Member)**

**1 NEW LONDON PLAN CONSULTATION**

**This report summarises the progress and next stages in the preparation of the new London Plan, highlights some of the key issues for Tonbridge and Malling and the wider south east and seeks endorsement of the officer level comments attached at Annex 1, which were returned by the deadline of the 2<sup>nd</sup> March 2018.**

**1.1 Background**

- 1.1.1 The planning system for Greater London is different to that applying to Tonbridge and Malling and the local authorities making up the wider south east. In Greater London there are 33 unitary authorities comprising the 32 London Boroughs and the City of London Corporation, which are required to prepare Local Plans in the same way, but these plans also have to be in accordance with a higher level strategic plan covering the whole of Greater London. This is called the London Plan and it is prepared by the Mayor for London, currently Sadiq Khan and the Greater London Authority.
- 1.1.2 The Draft London Plan that has recently been the subject of public consultations is the 3<sup>rd</sup> iteration, the previous versions being adopted in 2004 under Mayor Ken Livingstone and in 2011 under Mayor Boris Johnson, although there have been various alterations to these plans in the intervening years.
- 1.1.3 Due to the size of the Greater London conurbation and its role as a world city, the planning and development of London inevitably has a significant effect on the wider south east and the country as a whole. Consequently there has been a lot of interest in the proposals in the draft plan and joint responses by Kent and the South East England Councils (SEEC) have also been prepared with contributions from Kent Districts including Tonbridge and Malling. A draft of the Kent response is attached at Annex 2 for information. The final version of the SEEC response was not available at the time of writing this report.

1.1.4 The comments made in these joint responses are shared by Tonbridge and Malling and have been reflected in the officer level response at Annex 1 to the report.

1.1.5 Representations received within the consultation period will be considered by an independent Inspector at an Examination in Public anticipated to be held in the autumn of this year, the target adoption date for the new Plan is autumn 2019.

## **1.2 Summary of the Key New London Plan Policies and Proposals**

### **1.2.1 Housing Need**

1.2.2 The objectively assessed housing need for London is based on the 2017 London Strategic Housing Market Assessment (SHMA) prepared by the GLA. The draft London Plan sets out an overall housing target of 66,000 dwellings per annum for the first ten years of the plan (2019 to 2029). The methodology used by the GLA uses a shorter term migration trend analysis than that employed by the Office of National Statistics, which tends to be used by other Local Planning Authorities. The GLA justify this by pointing to the fluctuations in migration patterns before and after the economic recession in 2008, but it does mean there is a difference in the underlying assumptions used by the local planning authorities in the wider south east.

1.2.3 The SHMA pre-dates the government's proposed standardised methodology which was the subject of consultations last September and is expected to be introduced in the form of a revised National Planning Policy Framework later this year. If the methodology were to be applied to the Greater London authorities their housing need would increase by 6,000 dwellings per year resulting in an annual housing need of 72,000. It is anticipated that the London Plan will be submitted to the Secretary of State before the new requirements are introduced, but this does raise the question of how the likely uplift will be taken into account, particularly post 2029.

1.2.4 The London Strategic Housing Land Availability Assessment (2017) concludes that there is enough land within London to deliver 65,000 dwellings per annum through development (and redevelopment) opportunities within identified 'Opportunity Areas', within or on the edge of town centres and transport nodes and areas in outer London with good accessibility to public transport. Higher density and intensification is supported to deliver the homes needed. The Plan suggests that the shortfall of 1,000 dwellings per annum will be met by working with "willing partners" in the wider south east, although there is no indication of which local authorities in the wider south east this may be.

1.2.5 Based on current delivery rates, the anticipated completion of 65,000 new dwellings per year is ambitious and would appear to be relying on large increases in the outer London boroughs. Bromley for example would see an increase in its target from 641 to 1,424 per year (+122%). The London Plan justifies this on the grounds that outer boroughs tend to be relatively more affordable than inner

London and that higher densities of development should be considered, although it is unclear if there has been any analysis of the capacity of these housing market areas to increase delivery to this extent.

- 1.2.6 This reliance on large increases in delivery in the outer London Boroughs brings into question the ability of the Plan to meet most of its need within its boundaries. Add in the fact that housing needs are likely to increase with the introduction of the standardised methodology and a reluctance to consider Green Belt releases within Greater London and the unmet need could be significantly higher than the 1,000 currently accepted.
- 1.2.7 Half of all new homes are to be truly affordable through the provision of a mix of low cost rent and shared ownership.
- 1.2.8 New residential car parking spaces are to have the electric charging points for electric vehicles.
- 1.2.9 Green Belt Policy
- 1.2.10 The draft London Plan does not propose any revisions to the Green Belt designations within the Greater London area. As the draft Plan accepts that there will be unmet need it seems unreasonable that this option is not even being explored and runs contrary to the sustainable planning principles set out in the NPPF. If the implication is that 'willing partners' in the wider south east will be asked to take some of that unmet need, it raises the issue of whether revising Green Belt designations outside London is more or less acceptable than within Greater London.
- 1.2.11 Economy
- 1.2.12 The draft London Plan rightly recognises the need to sustain the wider city region and the Wider South East economy and seeks to sustain growth in jobs balanced with the number and type of homes London needs. It identifies potential for Strategic Industrial Locations beyond London's boundary where there are mutual benefits and scope to substitute some of London's industrial capacity.
- 1.2.13 The new London Plan supports additional aviation capacity but continues to oppose the expansion of Heathrow Airport if it results in a deterioration of air and noise quality.
- 1.2.14 Strategic Infrastructure
- 1.2.15 Thirteen strategic Infrastructure priorities are identified in the new London Plan and have been endorsed by the wider south east partners for initial delivery. In Kent, there are three priorities and these are:
- Thames Gateway Kent – Elizabeth Line extension and HS1
  - Lower Thames Crossing

- A27/M27/A259 and rail corridor improving links between Southampton and Dover

### **1.3 Implications of the new London Plan for Tonbridge & Malling**

- 1.3.1 The housing targets set out in the new London Plan are approximately twice the current delivery rates and whilst welcoming the commitment to meet almost all of London's growth needs within its boundaries, it is questionable whether or not this can realistically be delivered. Unmet need will almost certainly put pressure on surrounding local planning authorities to help deliver more homes, especially in light of the fact that the outer London Boroughs would be unable to consider releasing Green Belt land in preparing their Local Plans.
- 1.3.2 The capacity for local authorities in the wider south east to accommodate unmet need from Greater London is already severely limited and should the uplift in housing need in the proposed standardised methodology be introduced, there will also be widespread unmet need in the wider south east, begging the question 'How and where will the unmet need be addressed?'.
- 1.3.3 These concerns have been addressed in the officer level comments which can be found in Annex 1.

### **1.4 Legal Implications**

- 1.4.1 There are no legal implications arising from this report.

### **1.5 Financial and Value for Money Considerations**

- 1.5.1 There are no budgetary implications arising from this report.

### **1.6 Risk Assessment**

- 1.6.1 Comments made in respect of the emerging London Plan will be taken into consideration by the Mayor and GLA, but failure to do so will run the risk of these concerns not being recorded.

### **1.7 Recommendations**

- 1.7.1 That Members note the progress made in respect of preparing the draft London Plan and
- 1.7.2 Subject to any further comments members wish to make, endorse the officer response at Annex 1.

The Planning, Housing & Environmental Health confirms that the proposals contained in the recommendation(s), if approved, will fall within the Council's Budget and Policy Framework.

Background papers:

Nil

contact: Ian Bailey  
Planning Policy Manager  
Louise Reid  
Head of Planning

Steve Humphrey  
Director of Planning, Housing and Environmental Health