

Sadiq Khan (Mayor of London)  
New London Plan  
GLA City Hall  
London Plan Team  
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## **Annex 1**

Dear Sadiq,

### **Consultation on the Draft New London Plan – Response on behalf of Tonbridge and Malling**

Thank you for the opportunity to respond to the consultation draft of the new London Plan. Please note that these comments are made at officer level on behalf of Tonbridge and Malling Borough Council and will be considered by Members at the Planning and Transportation Advisory Board on the 6<sup>th</sup> March.

The Borough Council welcomes and acknowledges the ongoing dialogue between the Mayor and Greater London Authority and the local authorities making up the wider south east and in particular through the engagement with SEEC, which is Chaired by our Leader Councillor Nicolas Heslop.

Many of the issues highlighted in this response are similar in nature to those expressed by SEEC and also Kent County Council on behalf of all of the Kent Districts and Medway Council.

While acknowledging the methodological approach adopted by the GLA in preparing the Strategic Housing Market Assessment is different to that used in Tonbridge and Malling and the rest of the Kent Districts, the objectively assessed housing need for Greater London for the first ten years of the London Plan to 2029 is estimated to be 66,000 net new dwellings per year. The draft Plan asserts that most of this need (65,000 per annum) can be delivered within the Greater London area, which is welcomed, although the levels of delivery, particularly in the outer boroughs is considered to be ambitious given current rates of delivery.

However, assuming the Plan target can be met there is an accepted unmet need of 1,000 dwellings per year. The Plan argues that this will be accommodated by working with willing partners beyond the Greater London boundary, but no further detail is provided. Presumably, this will be addressed before the Plan is subject to examination later this year in order to satisfy the London Plan Inspector?

By the time the Plan is expected to be at examination in the autumn, it is very likely that the revised National Planning Policy Framework (NPPF) will be relaunched, introducing the proposed standardised methodology for assessing housing need in Local Plans. Although the London Plan will be allowed to proceed with the current assessments, assuming it will have been submitted to the Secretary of State before the NPPF is published, this may not be the case for the willing partner authorities in the wider south east.

In Tonbridge and Malling for example the uplift would represent a 23% increase or an additional 159 units per year on top of an already challenging target of 696. Evidence prepared to support our emerging Local Plan suggests delivery at these levels is unsustainable and Tonbridge and Malling has a good track record of delivery despite being over 70% Green Belt. Consequently, it is anticipated that we will be planning for some unmet need.

Therefore, if the uplift in housing need is as proposed in the recent consultation 'Building the right homes in the right places' it would seem unlikely that any local authorities in the wider south east would have the capacity to consider taking unmet need from their neighbours in the same Housing Market Area, let alone from Greater London. This would imply a significant risk to demonstrating the deliverability of the Plan.

In view of the fact that in reality there may be more than 1,000 dwellings of unmet need in London (i.e. to achieve this would require a considerable increase on current delivery rates, representing almost a doubling of annual completions, which would be concentrated in the outer London Boroughs) this risk could increase.

Since the draft London Plan only includes housing targets to 2029 implying an early review of the housing needs and delivery, this will inevitably have to incorporate the new standardised methodology soon to be introduced by the NPPF. This, as currently proposed, would have the effect of increasing London's need by another 6,000 dwellings per year.

So while the commitment to meet the majority of future housing need within Greater London is welcomed, the risks of an increasingly significant level of unmet need will need to be addressed urgently as part of the London Plan process. The consequences of sustained under delivery will be pressure on increased outward migration and rising house prices, which will counteract the efforts of all local authorities in the wider south east to meet their own needs and importantly increase the availability of more affordable housing.

Related to the risk of meeting future housing need is the approach adopted in the draft London Plan towards the use of Green Belt land. In Tonbridge and Malling, which is a borough with over 70% Green Belt designations, the emerging Local Plan is seeking to demonstrate exceptional circumstances to release some Green Belt to meet future needs for housing, employment and much needed infrastructure. In order to meet future needs where they arise and to explore sustainable patterns of development in accordance with the NPPF this is an approach that local planning authorities should explore once all other options have been exhausted.

By refusing to apply the same rationale to the inner edge of the Green Belt in Greater London this will have the effect of transposing some of London's unmet need beyond the Green Belt and into the wider south east and beyond, while increasing development pressures and land values within London. It is also inequitable to ask other Green Belt Authorities to consider taking some of London's unmet need, when there is a reluctance to do so closer to home.

Tonbridge and Malling therefore requests that the draft London Plan be amended to allow for a review of the Green Belt within Greater London as a precursor to working with willing partners in order to plan for future unmet housing need.

I hope these brief comments are of assistance. Please do not hesitate to contact me in the first instance if you have any further queries.

Yours Sincerely,

Ian Bailey  
Planning Policy Manager  
TMBC