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Annex 2

Sadiq Khan (Mayor of London)
New London Plan
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London Plan Team
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Dear Sadiq,

On behalf of Kent Leaders, I would like to thank you for inviting us to comment on the draft London Plan. We recognise the role and importance of the emerging Plan in guiding and shaping how London grows in coming years. As a County, we hope to be fully engaged as the Plan process evolves, to ensure the delivery of new housing, employment and required services and infrastructure across the Plan period.

Over recent years, Kent and Medway have delivered some of the highest housing rates in the country. However, with unprecedented funding challenges, this growth has far outpaced the delivery of the infrastructure that is needed to sustain it. The County is at breaking point, with severe congestion on the roads, overcrowded trains and even longer waiting times for health facilities, an ever increasing challenge to quality of life for residents and businesses.

Nonetheless, as a strategic gateway and link to Europe, and its contribution to the Capital's workforce, the County remains critically important to national productivity, and key infrastructure projects such as the Lower Thames Crossing and the proposed Crossrail to Ebbsfleet extension (C2E) will significantly enhance this role.

Infrastructure and housing requirements need to be considered over a wide strategic geography and in the case of the County of Kent¹, the proximity to London is increasing housing demand and impacting on Kent's growth and infrastructure. With a further forecast population increase in the coming years and issues around house price affordability in London, Greater London will continue to have an increasing impact on Kent.

The challenge for districts and boroughs from additional population flows into the County is not just from pressure on already stretched infrastructure provision and service capacity, but also in finding the suitable sites to deliver growth sustainably.

The intention for the draft London Plan to deliver just short of 65,000 of the 66,000 annual housing need forecast is welcomed, as is the commitment for collaboration with the wider South East.

This letter sets out the concerns of the County as a whole. Individual districts in Kent will be making their own representations on the draft London Plan.

1) Meeting London's housing needs

¹ Reference to "Kent" throughout this letter incorporates the areas within the Kent County Council and Medway Unitary Council's boundaries

The Kent and Medway Growth and Infrastructure Framework (GIF) identifies a significant pressure on infrastructure provision to meet an increased forecast rise in both population and housing across the County up to 2031. With population growth up to 2031 forecast at 178,600, and planned housing growth of 396,200 within the same period, the cost of infrastructure to meet that growth is calculated at over £16 billion. The ambition of the draft London Plan to meet most of its own identified housing need within the London boundary is therefore strongly supported, as any additional population flows into the County would put increased pressure on already stretched infrastructure provision and service capacity. Nevertheless, there are a number of issues in relation to the provision of housing that are likely have direct implications for Kent and Medway, to which concerns are raised.

The use of a separate methodology (as set out in the Strategic Housing Market Assessment (SHMA)) to determine the housing need figures for the London Plan will create ambiguity. Its inconsistency with national planning guidance and the way in which authorities in Kent have calculated their needs, will open up risk to challenges to Local Plans in Kent (and wider), where developers seek to apply London's assessment methodology for housing need. Current need assessments prepared by the districts already factor in internal out-migration from London and further clarity is also needed on the implications of London migration patterns in Kent, to ensure there is not double counting.

In planning to deliver just short of 65,000 of the 66,000 annual housing need forecast, the draft London Plan identifies a **delivery shortfall of 1,000 houses a year**. The district and borough councils within the County have already including an uplift for net migration from London within their SHMAs. Any additional cumulative impact of up to 1,000 additional homes a year that might be apportioned to the County would have significant implications on the provision of housing, infrastructure and services across the County, particularly given the severe pressures in provision and funding of infrastructure already identified in the GIF.

In addition to this, we are currently awaiting the outcome of the **Government's consultation on a standardised national housing methodology**. If this does come into force, it would place pressure on the County to meet additional housing, well over and above our existing housing targets – the Kent and Medway annual housing requirement would have to increase by 39%. The draft London Plan calls for the construction of new homes to increase substantially to 66,000 additional homes a year. However, this figure still remains well below the figure of 72,400 a year set out in the Government's proposed housing methodology; a figure that would potentially require some seven new settlements.

There is also concern that **the draft Plan's focus on the first ten years** - to deliver just short of 65,000 dwellings a year up to 2028/29 - leaves uncertainty over the remainder of the Plan period to 2041. The Plan is unclear of the role of areas outside London in meeting post 2029 needs. More certainty and further explanatory detail is required, particularly around priorities and delivery after the first ten years of the Plan.

The draft London Plan also introduces an **increased emphasis on delivering small sites for housing** (Policy H2). The delivery of small sites is supported in so far as it will help to increase delivery of new homes. However, the development of small sites can hamper the ability to provide comprehensive infrastructure to support housing growth, and there will need to mechanisms in place to prevent knock-on impacts, particularly on Kent's districts and boroughs adjoining the London boundary, where capacity where service capacity is already stretched. In order to prevent the Plan from being too prescriptive in determining growth of housing on small sites, it would be beneficial to undertake further collaboration with local boroughs to encourage delivery on a variety of sites based on local

opportunities. In some locations, the level of delivery on small sites may be unachievable due to the lack of availability.

The London Plan must ensure that the **required range and mix of private and affordable housing** is delivered within the boundaries of London. London boroughs should be required to deliver affordable homes within a reasonable vicinity of their area to avoid significant relocation into Kent and to prevent inevitable additional strains on resources from already stretched public services.

There is a potential risk that with the ambitious housing targets for the outer boroughs and the refusal to assess the functioning of the inner boundary of the Green Belt, London may not be able to meet all of its needs within its boundaries. This could result in unmet needs. It is highly questionable whether the housing markets outside London will have the capacity to deliver not just a boost in supply arising from current need assessments prepared by the districts, but any additional housing to help meet London's projected needs. This is a concern not just in terms of the availability of deliverable sites – taking account of constraints such as the Green Belt and Areas of Outstanding Natural Beauty – but also in terms of what the local markets can realistically support. This is a genuine concern, particularly given the current uncertain economic climate.

The scale of growth across the Wider South East is significant. With an increasing focus on the Northern Powerhouse to invest and develop in industries in the north of England, there needs to be renewed focus on the industries in the South East, to ensure that they remain competitive against the investment in the North. **Kent Leaders strongly advocate the need for much more positive inter-regional planning, where London is seen as an integral part of the Wider South East, to relieve pressure on the South East.**

We would like to know how you will deliver your aim of meeting London's need within its boundary and how the annual 1,000 homes gap will be tackled. Kent Leaders would expect to see a clear and robust mechanism incorporated into the London Plan to ensure that if housing delivery targets are not being met, actions are triggered to ensure that any surplus housing needing to be accommodated outside the London boundary is supported by the additional supporting services and infrastructure.

2) Cross boundary working and strategic infrastructure

The clear recognition within the draft London Plan of the impact on areas outside London (most notably in "Chapter 2: Spatial Development Patterns") is acknowledged and supported.

However, whilst references to partnership work are encouraging, in reality there have been limited examples of cross-boundary working. There has, in our opinion, been no sustained attempt to identify, establish or develop working relationships with district and boroughs who could be potential willing partners for growth. Within this context, looking forward, it is not clear how the Mayor intends to work with the Wider South East partners on regional challenges and shared strategic concerns (as referenced in Policy SD2). The continued reference to 'willing partners' provides no clarity as to the potential value that may derive from this relationship.

There are already current pressures across the County in providing infrastructure to support planned growth, with the emerging GIF 2017 Update identifying an infrastructure cost gap of over £3.9 billion to meet the County's planned growth up to 2031. Kent and Medway are therefore facing increasing challenges to meet our own growth requirements, with the need for major infrastructure proving a significant hurdle and constraint to major growth. Any additional housing pressures from London cannot be subsumed within the County without significant investment in strategic infrastructure.

The draft London Plan references the need to work with willing partners beyond London to explore whether there is potential to accommodate more growth in sustainable locations outside the capital (para. 2.3.4), with policy SD3 seeking joint working and recognition of mutual benefits (e.g. strategic infrastructure from growth locations outside London). County Leaders would like robust assurances included in the London Plan to set out what this will look like, particularly given the context of still only limited meaningful cross-boundary working to date. Details on specific incentives and actions are also required to evidence how the desired employment relocation may be achieved.

Your recognition of Thames Gateway (Elizabeth Line extension and HS1) and the Lower Thames Crossing as critical strategic infrastructure projects (and set out as Strategic Infrastructure Priorities in Figure 2.15) is also strongly supported.

Officers have been engaged with your officers, the London Borough of Bexley and others to explore the potential for rail improvements beyond the current Crossrail terminus at Abbey Wood and the County strongly backs the Mayor's support of the London borough of Bexley and adjoining Kent authorities in seeking an extension of the Elizabeth Line (paragraph 2.1.53). Support is also given to Policy T3, in classing it as a priority for delivery through planning decisions. Notwithstanding this, major capital contribution to the Crossrail extension, as well as for necessary infrastructure, will be required and funding support from the Mayor will be crucial.

3) Green Belt and Housing Needs

The commitment to growth within the London boundaries is supported. However, it is hard to see how the combination of 1) ruling out the de-designation of any areas within the inner edge of the Green Belt and 2) housing targets that will require a significant jump to delivery rates, will not result in placing significant pressure on meeting London's needs beyond the outer edge of the Green Belt. It is questionable if this is the most sustainable pattern of development.

The significance of paragraph 84 of the National Planning Policy Framework (NPPF), and in particular the need to promote sustainable patterns of development when reviewing Green Belt boundaries, should not be under-estimated, and was indeed a key issue raised at a number of Local Plan examinations². It is not clear how the London Plan accords with this paragraph of the NPPF.

With areas outside London being under pressure to commit to, and undertake, greenbelt reviews in order to accommodate high levels of growth, this same approach should be consistent across London. However, Policy G2 "London's Green Belt" is much more restrictive than national policy and would not create a level playing field between Local Plans outside London governed by national Green Belt policy and those within London.

Furthermore, the risk of adopting a policy that is much more restrictive to growth, in favour of strong Green Belt protectionism, will risk a reduction in the ability of London Boroughs to plan to meet their needs in their Local Plans. It is noted that a further proportion of the capital is also protected as "Metropolitan Open Land" where restrictions similar to Green Belt apply. The knock on effect will be that areas outside London are expected to accommodate a higher proportion of London's housing need in the future – which will likely be beyond the annual 1,000 houses already acknowledged in the draft London Plan.

² Including Coventry, Cheshire East, Cambridge City and South Cambridgeshire and the Vale of White Horse

As District and Borough Leaders representing all the districts and boroughs across Kent, Kent County Council and Medway Council, we look forward to the opportunity to work with you as work on the London Plan continues to develop, particularly around the drafting and progression of policies relating to the wider South East.

Yours sincerely

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