

TONBRIDGE & MALLING BOROUGH COUNCIL
PLANNING and TRANSPORTATION ADVISORY BOARD

4 June 2014

Report of the Director of Planning, Housing and Environmental Health

Part 1- Public

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

1 CONSULTATION ON THE FURTHER ALTERATIONS TO THE LONDON PLAN

This report advises Members of the recent consultations on the Further Alterations to the London Plan and seeks endorsement of the officer level comments returned by the deadline in April.

1.1 Introduction

1.1.1 In January this year the Greater London Authority launched a public consultation on draft further alterations to the London Plan (FALP), which was adopted in 2011. The purpose of the alterations is primarily to address key housing and employment issues arising from the release of 2011 census data, which indicate a significantly higher population increase.

1.1.2 The consultation ran from 15th January to 10th April and over 300 responses were received. Given the influence of London within the city/region the estimates of future needs and how these will be met will be an important consideration for Local Planning Authorities across the south east. An Examination in Public is scheduled to begin on 1st September 2014.

1.2 Key Issues

1.2.1 The revised population projections suggest that London may fail to meet all of its future housing needs, potentially up to between 7,000 to 20,000 per annum. Under the Duty to Cooperate local authorities close to London may be asked to take some of this unmet need in their Plans. In February this year the GLA responded to a Local Plan consultation by Bedford Borough Council suggesting that this should be taken into consideration. Bedford argued that there are local authorities nearer to London that should take such matters into consideration and that the evidence on the shortfall was incomplete. The effect of this exchange was to raise awareness of this issue across much of the south east outside London.

- 1.2.2 The officer's response noted that as the recently completed Strategic Housing Market Assessment for Tonbridge and Malling takes account of inward migration from London and that, as these figures are derived from the revised Census data the London Plan is now addressing, then arguably we have already taken into account any uplift in the figures.
- 1.2.3 Some of the other responses made in respect of the further alterations have requested that the GLA and the London Boroughs do more to try and accommodate the projected growth within Greater London, for example, by reviewing the inner edge of the Green Belt, which currently has been excluded from their considerations. The officer level response reiterates this point and recommends a coordinated approach to such a review.
- 1.2.4 The response also highlights recent changes in national planning guidance that may contribute to meeting London's housing need, such as the ability to use a windfall allowance beyond the first five years of the plan period and also the fact that institutional accommodation (use class C2) can count towards meeting housing needs. It is suggested that these two factors alone could reduce London's housing need significantly.
- 1.2.5 An opportunity has also been taken to flag up the importance of investment in infrastructure to accompany future growth and to invite discussions at the appropriate time with the GLA and the Local Enterprise Partnership.

1.3 Conclusions

- 1.3.1 This report summarises some of the key issues arising from the recent consultations into the draft further alterations to the London Plan and seeks endorsement of the officer level comments submitted in April that are appended to this report.

1.4 Legal Implications

- 1.4.1 There are no legal implications arising from these comments in respect of the draft further alterations to the London Plan, although the responses will help to demonstrate the Council's ongoing constructive liaison over strategic planning matters in accordance with the Duty to Cooperate

1.5 Financial and Value for Money Considerations

- 1.5.1 There are no direct financial and value for money considerations arising from this report.

1.6 Risk Assessment

- 1.6.1 Not taking the opportunity to respond could present a risk that the Borough Council's concerns are not taken into consideration and that the Duty to Cooperate has not been adhered to.

1.7 Equality Impact Assessment

1.7.1 See 'Screening for equality impacts' table at end of report

1.8 Policy Considerations

1.8.1 Any Strategic Planning issues will be addressed in the Tonbridge and Malling Local Plan and these will be informed by the emerging London Plan.

1.9 Recommendations

1.9.1 That the officer level responses appended to this report **[Annex 1]** are **ENDORSED**.

The Director of Planning, Housing and 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:

contact: Ian Bailey

Nil

Steve Humphrey

Director of Planning, Housing and Environmental Health

Screening for equality impacts:		
Question	Answer	Explanation of impacts
a. Does the decision being made or recommended through this paper have potential to cause adverse impact or discriminate against different groups in the community?	No	Comments are in respect of the draft alterations to the London Plan.
b. Does the decision being made or recommended through this paper make a positive contribution to promoting equality?	No	Comments are in respect of the draft alterations to the London Plan.
c. What steps are you taking to mitigate, reduce, avoid or minimise the impacts identified above?		

In submitting this report, the Chief Officer doing so is confirming that they have given due regard to the equality impacts of the decision being considered, as noted in the table above.