

Response to the Further Alterations to the London Plan

To Boris Johnson, Mayor of London

Dear Mr Johnson,

Draft Further Alterations to the London Plan (FALP) January 2014

Thank you for this opportunity to comment on the FALP, which clearly has become necessary in the light of new information becoming available, particularly in respect of revised population projections based on the latest data from the 2011 Census. As you will be aware there have been more recent events since the publication of the Draft FALP, which will also need to be taken into consideration, in particular the publication of the final version of the Planning Practice Guidance on 7th March and also various Ministerial statements and recent Inspector's reports relating to Green Belt policy.

The focus of many Local Planning Authorities within the London City Region will of course be in respect of the implications of the Greater London area not meeting the revised housing need for the Plan period and I am sure the concerns of Bedford Borough Council set out in Paul Rowland's letter of the 5th March will be reiterated many times.

Tonbridge and Malling have recently received a new Strategic Housing Market Assessment prepared by GL Hearn and Partners, which uses the same 2011 Census data that underpins the FALP. It utilises a methodology that reflects the National Planning Policy Framework (NPPF) and new Planning Practice Guidance (PPG) and has identified an Objectively Assessed Need for new housing that takes into account inward migration, including that from London. Therefore, in our opinion the evidence base for Tonbridge and Malling's new Local Plan already takes into account the most up to date population movements that have a bearing on our Local Plan. There should therefore be no further expectation that any additional housing need should be addressed in Tonbridge and Malling, beyond the level we have identified, which in itself will be very challenging locally.

However, for other Local Planning Authorities that might not be at the same stage of plan making, the uncertainty that the FALP introduces in terms of future unmet need is very disconcerting and efforts should be made to minimise this. Failure to do so could potentially undermine Local Plans at Examination, particularly when demonstrating how they have met the Duty to Cooperate.

The new PPG published in March reinforced the Duty to Cooperate and how it should apply in respect of London and those authorities adjacent:

Cooperation between the Mayor, boroughs and local planning authorities bordering London will be vital to ensure that important strategic issues, such as housing delivery and economic growth, are planned effectively.

This will be a key test of soundness at future Examinations and evidence will be needed to demonstrate that positive cooperation has taken place in respect of these important cross boundary issues, not least of which is the future extent of the Metropolitan Green Belt.

The NPPF and PPG allow Local Planning Authorities to review their Green Belt designations as they prepare or review Local Plans. This has recently been reiterated in correspondence between the Planning Minister Nick Boles and Sir Michael Pitt of the Planning Inspectorate.

This provides an opportunity to balance selective Green Belt releases against meeting other Local Plan objectives, such as unmet housing need. Tonbridge and Malling will be reviewing its Green Belt as part of the Local Plan process and other Local Planning Authorities have recently done the same, for example, Reigate and Banstead. It seems inconsistent and unfair, therefore, that the inner edge of the Metropolitan Green Belt in Greater London will be exempt from such a review, particularly in a context where the unmet housing needs for London will be considerable.

The implication is that the GLA, in asking Local Planning Authorities bordering London to accept some of its unmet housing need, is using a different set of constraints as the latter will almost certainly be required to review their Green Belt to meet not only their own need but also the unmet need of London and potentially other Authorities within the same Housing Market Areas.

This Council would therefore strongly urge a reconsideration of the review of the inner edge of the Green Belt as part of the FALP. Ideally this would involve collaboration with other Green Belt Authorities around London to ensure that the review and any amendments to the Green Belt were carried out in a coordinated way resulting in a defensible and permanent Green Belt for the Plan period.

Turning to the recent publication of the PPG, the FALP could now usefully incorporate at least two new measures to increase potential housing supply within Greater London that may reduce the potential for unmet need. The first relates to windfall allowances and the second to recognising institutional accommodation (Use Class C2 e.g. student accommodation and care homes) as counting towards meeting housing need.

Para 3.19a of the FALP refers to a windfall allowance forming part of the 5 year supply, but does not extend this beyond the first five years. The PPG on Housing and Economic Land Availability Assessments now states:

Local planning authorities have the ability to identify broad locations in years 6-15, which could include a windfall allowance based on a geographical area (using the same criteria as set out in paragraph 48 of the National Planning Policy Framework).

If not already in hand, this should now be incorporated into the FALP.

Para 3.50b of the FALP refers to a need for 400-500 new care home bed spaces per annum. If these were to be counted as meeting housing need, this alone could represent a reduction of up to 10,000 units to 2025. Para 3.52 notes that increased student accommodation could take pressure off housing supply as students would not be occupying other housing options. It suggests there could be up to 20,000 student bed spaces over the plan period 2015-25. These two C2 components alone could reduce the unmet need by 30,000 units.

Finally, in respect of planning for strategic infrastructure to accompany the planned growth in the FALP this will clearly be an important consideration for Local Planning

Authorities outside London and their Local Plans especially if there is an anticipated decentralisation of employment uses. At the appropriate time this Council would welcome a discussion with the GLA and the South East Local Enterprise Partnership about future investment proposals, particularly in respect of improvements to junctions off the M25, M20 and M2 as they relate to Tonbridge and Malling.

I hope these brief comments have been of assistance.

Yours sincerely,

Steve Humphrey

Tonbridge and Malling Borough Council

Director of Planning, Housing and Environmental Health