

Boris Johnson
Mayor of London
By email only

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Dear Mr Johnson

FURTHER ALTERATIONS TO THE LONDON PLAN CONSULTATION

Sevenoaks District Council's (SDC) response to this consultation focuses on housing and associated infrastructure issues, given the implications for this District, which borders Greater London. The key issue to SDC is how London's excess housing need will be met, primarily related to London Plan Policy 3.3 (Increasing Housing Supply).

Ongoing under-provision in London effectively means areas outside the capital will come under even further pressure to accommodate development on top of existing substantial growth levels. This may lead to increased demand on areas outside London, such as Sevenoaks District, in relation to:

- Land, including pressure for Green Belt reviews and to use employment land/commercial premises for homes.
- Transport infrastructure, particularly commuting routes
- Utilities infrastructure, including water, power and waste
- Council services e.g. education, care etc.

It is suggested that London must do more to meet its own housing need. SDC welcomes the Mayor's aim to increase targets/house building but more should be done to meet London's own expected need if it is to support sustainable economic growth. Otherwise, there is a risk that Districts in the South East, such as Sevenoaks, could become dormitories for London's workforce. This would potentially damage locally-driven growth by increasing commuting and reducing employment land.

Sevenoaks District faces significant constraints on development. The District has the third greatest proportion of Green Belt in England, covering 93% of the District, which

demonstrates the scale of this strategic constraint. In addition, 61% of the District is designated as an Area of Outstanding Natural Beauty, which is also afforded the highest status of protection in relation to landscape and scenic beauty (NPPF Para 115). Therefore, it is a challenge for the District to accommodate its own objectively assessed needs, particularly in relation to housing, without even considering any potential over-spill of housing need from central London.

Sevenoaks District Council, together with many other South East Councils, may need to look at 'difficult' options for growth, including potential Green Belt reviews. London should similarly take the opportunity to consider Green Belt reviews, and this should be acknowledged in London Plan Policy 7.16 (Green Belt). This should be in addition to maximising brownfield and appropriate high density opportunities, to ensure London takes all opportunities to meet its housing need.

Effective political and technical engagement between the Mayor and adjoining Councils, such as Sevenoaks (collectively and individually) on the planning, infrastructure and service implications of growth must be a prerequisite for effective and sustainable growth. In addition, it is recommended that the formal Duty to Co-operate is applied to the London Plan's preparation, as a mechanism for considering where objectively assessed needs will be met.

Yours sincerely

Cllr Ian Bosley
Portfolio Holder for Local Planning and Environment