

Further Alterations to the London Plan (FALP) Portfolio Holder Briefing Note (April 2014)

The Mayor of London is consulting on Further Alterations to the London Plan (FALP), prior to a Planning Inspectorate public examination in the autumn. These alterations have been prepared primarily to address key housing and employment issues emerging from an analysis of census data released since the publication of the London Plan, which indicate a substantial increase in the capital's population. The London Plan sets housing targets and other planning policy for London boroughs.

The FALP updates a range of London's housing, economic, environmental and community policies. It is suggested that SDC submits a brief high-level response focused on housing and associated infrastructure issues, given the implications for this District. A key issue is how London's excess housing need will be met.

The Mayor aims to substantially increase housing growth in London, through the FALP, but it is acknowledged in the Plan that it will still not be enough to meet London's housing needs. This potentially places additional house-building pressure on areas outside London, such as Sevenoaks District, on top of existing growth levels which already include provision for households moving out of London.

The Mayor proposes increasing London's housing target to a minimum of 42,000 homes pa, confirming figures in London's recent draft Housing Strategy (London Plan Policy 3.3 Increasing Housing Supply). This is 10,000 pa more than the current target and double recent building rates. However this is 7,000-20,000 pa less than housing need identified in the Mayor's London Strategic Housing Market Assessment (SHMA). The 42,000 pa target is based on London's Strategic Housing Land Availability Assessment (SHLAA), which indicates housing capacity taking account of policy constraints such as London's Green Belt.

SUMMARY OF KEY FIGURES	London Plan
Current housing target	32,000 homes pa
New housing target - London Plan Further Alterations consultation	42,000 homes pa
Current delivery rates (average 2010/11-12/13)	19,000 homes pa
New estimate of housing need in Mayor's Strategic Housing Market Assessment (taking into account need to address backlog of under-provision/unmet need)	49,000 - 62,000 homes pa
Potential overspill to areas outside London (i.e. gap between London's new housing supply target & need)	7,000-20,000 homes pa

Ongoing under-provision in London effectively means areas outside the capital, for example the South East, will come under even further pressure to take more 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 should welcome the Mayor's aim to increase targets/house building but London should do more to meet its 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.