

Decision Maker: **DEVELOPMENT CONTROL COMMITTEE**

Date: **Tuesday 10 February 2015**

Decision Type: Non-Urgent Non-Executive Non Key

Title: **UPDATE ON THE FURTHER ALTERATIONS TO THE LONDON PLAN AND IMPLICATIONS FOR THE BOROUGH**

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Chief Officer: Chief Planner

Ward: (All Wards);

1. Reason for report

- 1.1 This report updates the Committee on the progress of the Mayor's Further Alterations to the London Plan and the main implications for Bromley. The Mayor, in December 2014 wrote to the Secretary of State advising that he intends to publish, and adopt the Further Alterations to the London Plan accepting the recommendations of the Inspector following the Examination in Public. It is anticipated that the FALP will be adopted in March 2015. They will then form part of the Development Plan for the Borough.
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2. **RECOMMENDATION(S)**

That the Committee:

- 2.1 note the intention of the Mayor to adopt the Further Alterations to the London Plan (FALP) in March 2015;
- 2.2 note the recommendations of the Inspector, and the issues for Bromley as set out section 3.
- 2.3 note the requirement for the Council to be able to demonstrate conformity with the housing supply figure of 641 dwellings per annum.

Policy

1. Policy Status: New Policy:
 2. BBB Priority: Children and Young People Excellent Council Quality Environment Safer Bromley Supporting Independence Vibrant, Thriving Town Centres:
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Financial

1. Cost of proposal: N/A
 2. Ongoing costs: N/A
 3. Budget head/performance centre: N/A
 4. Total current budget for this head: N/A
 5. Source of funding: N/A
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Staff

1. Number of staff (current and additional):
 2. If from existing staff resources, number of staff hours:
-
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Legal

1. Legal Requirement: Statutory Requirement:
 2. Call-in: Not Applicable:
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Customer Impact

1. Estimated number of users/beneficiaries (current and projected):
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Ward Councillor Views

1. Have Ward Councillors been asked for comments? Not Applicable
2. Summary of Ward Councillors comments:

3 COMMENTARY

- 3.1 The Mayor published the draft Further Alterations to the London Plan (FALP) in January 2014, in the same week the Council approved Bromley's Draft Policies and Designations (DP&D) for consultation in February/March. Consequently, the DP&D document made no reference to the FALP. The Council's Executive in April 2014 agreed the Council's response to the FALP which included a number of objections and concerns.
- 3.2 The Council's main objections related to the proposed increase in the Borough's ten year housing figure from 5000 to 6413 and annual housing figure from 500 to 641, minimum residential parking standards and the down grading of Orpington and Bromley Town Centre classification under the office guidelines. In addition, the Council raised concern regarding the wording and impact on density and character of the Opportunity Area status for Bromley Town Centre, and request for the three month limit on local income criteria for intermediate housing to be extended to six months, and a cautious welcome to the identification of Crystal Palace as a potential Strategic Outer London Development Centre.
- 3.3 On 15th December the Mayor published the Inspector's report (dated 18th November) into the Examination in Public (EiP) of the FALP, which took place in September over a three week period. The Mayor made Suggested Changes in July and Further Suggested Changes in September (during the EiP) and in October. The Inspector concludes if these are incorporated into the FALP together with his recommendations the London Plan as changed by the FALP provides an appropriate basis for the strategic planning of London.
- 3.4 The Mayor has written to the Secretary of State for Communities and Local Government advising that he intends to adopt the FALP with amendments, and also to address government concerns over current London Plan policy on car parking and also housing standards. FALP para 0.16F provides a formal commitment, and the Mayor is looking to address this through additional minor alterations without delaying the publication of the FALP.
- 3.5 The Mayor has stated his intention to adopt the FALP in March 2015, reconvene the Outer London Commission to provide advice on the most effective approach to progressing national parking proposal in the distinct circumstances of London and commence the review of the London Plan as soon as the FALP is adopted.
- 3.6 A copy of the Further Alterations to the London Plan with changes since 2011, and a copy of the Inspector's Report in full can be found at <http://www.london.gov.uk/priorities/planning/london-plan/draft-further-alterations-to-the-london-plan> . Copies of both have been placed in the Members' Room for information.

Key Issues for Bromley

- 3.7 The London Plan, with its alterations is part of the Development Plan for the Borough. General conformity with the London Plan is a central requirement of the Borough's Local Plan to be found 'sound'.
- 3.8 The Inspector's report highlights several key issues and points for Bromley:
- the household projections produced by the GLA are seen as reasonable, and a build rate of 62,000 dwellings per annum is required to meet London's objectively assessed need over 10 years or 49,000 per annum required if met over 20 years.

- Table 3.1 of the FALP (reproduced as Appendix 1) which sets targets for all London borough, and 641 dwellings per annum for Bromley, totals 42,389 dwellings per annum, leaving 6,600 dwellings per annum to be found across London. The Inspector's view is that if a Local Plan made provision for the housing number in Table 3.1 it would be hard to see how it would not be in general conformity with the London Plan. The figures in Table 3.1 will need to be worked through to new provision in Boroughs' Local Plans.
- The Mayor committed to a review of the London Plan starting in 2016, however the Inspector states that he does 'not consider that London can afford to wait until then and recommend that a review commences as soon as the FALP is adopted in 2015'.
- The FALP deleted text allowing local eligibility criteria to be set for affordable housing for three months, however, the Inspector recommended this be reinstated, however, he accepted that three month limit was sufficient time.
- No changes are made to the Opportunity Areas, including Bromley Town Centre. Bromley had requested minor modifications to the description for the town centre.
- The objection to the demotion of the office guideline classification their town centres, by Bromley and Kingston Councils is not supported with the statement that 'the change in designation does not preclude either borough from permitting schemes for office development in their town centres'.
- The Inspector did not recommend any changes to the residential car parking standards in the FALP with the comment that the FALP is flexible and strikes the right balance. While the FALP does not change the maximum parking standard, it does change the wording in relation to planning decisions from 'apply' the standards to their being 'the basis for considering'. The inspector does not recommend changes.

3.9 The main issue for the Council is the increased housing figure of 641 dwellings per annum for Bromley Borough.

3.10 The Bromley Local Plan will need to demonstrate conformity with the FALP housing figure for the Borough to be found 'sound'. The annual 641 figure is based on the London wide Strategic Housing Land Availability Assessment (SHLAA) which included a methodology to assess the probability of sites over 0.25 hectares being delivered within the London Plan period and a figure for sites below this size (small sites) based on historic delivery between 2004-2012.

3.11 The main difference between the 500 and 641 per annum housing provision arises, as is evident from the London SHLAA, from the 'small sites' part of the housing provision.

3.12 The National Planning Policy Framework (NPPF) specifies that local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements with an additional 5% (moved forward from later in the plan period) to ensure choice and competition in the market for the land. This buffer is increased to 20% where there has been persistent under delivery of housing. Bromley has met its housing figure in recent years and therefore a 5% buffer is adequate.

3.13 The Council's Development Control Committee in September 2014 agreed the Borough's Five Year Housing Land Supply Paper for 2014/19. This shows the Council having a suitable five year land supply to meet the 500 homes per annum figure in the 2011 London Plan. If the Mayor adopts the FALP, a further report will be made to the Committee on the Five Year Housing Land Supply, with the aim of complying with national guidance.

3.14 While the FALP does not change the residential parking maximum standards the wording in Policy 6.13 Parking, provides increased flexibility together with a recognition of greater dependence on the private car in outer London. The GLA objected to the proposed

residential parking standards in the Council's Local Draft Policies and Designations in 2014 as being in non-conformity with the 2011 London Plan and it is anticipated they would still have objections. However, as part of the updating of the Council's evidence base for the Local Plan research is being undertaken to support specific Bromley standards in the context of the increased flexibility in the FALP.

4. POLICY IMPLICATIONS

4.1 The London Plan forms part of the Development Plan for the Borough, and the Council's Local Plan is required to be in 'general conformity' with the London Plan.

5. FINANCIAL IMPLICATIONS

5.1 Although there are no financial implications at this stage, it should be noted that should a higher housing figure be adopted in the future, this may have implications for the Council, with a greater demand for public services due to an increased population.

5.2 There could be future costs associated with the preparation and submission of the Council's representation and attendance at any subsequent hearing sessions into further alterations of the plan. Any costs will have to be contained within the existing planning budget.

Non-Applicable Sections:	Personnel and Legal Implications
Background Documents: (Access via Contact Officer)	Report DRR14/025 Draft Further Alterations to the London Plan - Executive 2 nd April 2014