

EiP Secretariat  
GLA (Post Point 18)  
City Hall  
The Queen's Walk  
London  
SE1 2AA

Dear Sir/Madam,

I am attending the Examination in Public of the London Plan on the morning (but not afternoon) of Monday 11<sup>th</sup> February in my capacity as Member of Parliament for Croydon South.

In addition to the comments which I submitted for the general London Plan consultation, I have the following specific points relating to Housing Supply targets which I would like to raise at the meeting.

1. I accept the increased London-wide total of 64,935 new units per year on average. This is necessary to meet population growth and begin to erode the cumulated under supply that exists
2. Croydon adopted a new Local Plan in February 2018. This was examined and approved by a Planning Inspector, and subsequently passed by the Council. Over the plan period of 2016-2036 the housing delivery target was 32,890 equating to 1,567 units per year (taking the period as being inclusive of the start and end years, making a 21 year period)
3. The 2016 London Plan has an annual target for Croydon of 1,435 units – broadly consistent with the Croydon Local Plan figure
4. The new draft of the London Plan has an elevated target of 2,949 units per year for Croydon – around double the 2016 London Plan and double the 2018 Croydon Local Plan
5. I submit that the proposed annual housing target for Croydon in the new proposed Plan is unreasonably high, and should be conformed to the 2018 Croydon Local Plan target and the 2016 London Plan, for the following reasons:
  - a. The new London Plan target for Croydon is around double the 2016 London Plan and around double the 2018 Croydon Local Plan figure – the Croydon was ratified by a Planning Inspector in early 2018 and approved by the Council members
  - b. The Croydon target has been more than doubled (+106%), yet the increase London-wide is 53% - comparing the new proposed London Plan to the 2016 one in force
  - c. Neighbouring Bromley to the north east (a Borough of broadly similar population and a much larger geographic area) has an annual target of 1,424 (around the level which Croydon should have as well)
  - d. Neighbouring Sutton to the west (a Borough with a population and area approximately 2/3 of Croydon) has a new target of 939. Grossing this up by  $(3/2) \times$  gives again an annual figure of around 1,500 for Croydon. Although Croydon Town Centre is heavily urban this is only a small fraction of the Borough (around 6% by population). Most of the Borough of Croydon is suburban like Bromley and Sutton, and even semi-rural on the border with Surrey on the eastern and southern edges of the Borough

- e. Some inner London Boroughs, where it would be appropriate to build very tall buildings, have seen their targets reduced from the 2016 London Plan or have seen only modest increases
6. The Croydon target should be set at 1,500 per year as per the Croydon Local Plan. The difference could be made up by simply freezing the 2016 targets for some Inner London Boroughs rather than cutting them as currently proposed. This would add back 1,418 units per year into the new proposed targets as follows:
- a. Hackney 269 units extra (by sticking to 1,599 as per the 2016 London Plan not cutting to 1,330)
  - b. Islington 489 units extra (by sticking to 1,264 as per the 2016 London Plan not cutting to 775)
  - c. Southwark 182 units extra (by sticking to 2,736 as per the 2016 London Plan not cutting to 2,554)
  - d. Tower Hamlets 420 units extra (by sticking to 3,931 as per the 2016 London Plan not cutting to 3,511)
  - e. Westminster 58 units extra (by sticking to 1,068 as per the 2016 London Plan not cutting to 1,010)

I look forward to discussing these points at the morning session on the 11<sup>th</sup> February.

Kind regards,

Chris

**Chris Philp MP**

Member of Parliament for Croydon South  
House of Commons, London SW1A 0AA