

Draft London Plan Legal, Procedural and General Matters

Consultation and Engagement

M6. Was the consultation carried out during the preparation of the Plan in accordance with relevant legislation, and did it involve early and meaningful engagement and collaboration with the community, local authorities, organisations and businesses?

It is necessary to examine what the GLA has done to plan for certain strategic priorities, one of which would be the DLP's undersupply of 10,000 homes.

We note that the Mayor has facilitated a number with representatives of the Wider South East (WSE). These are documented in the GLA's response to the panel (paragraphs 19-28). The engagement has been active and on-going, but it has never been meaningful and constructive in relation to the question of housing. At no point was the glaring strategic question of London's unmet housing need (current or future) ever broached with the view to finding a practical solution to the problem. The Mayor has not formally approached the representatives of the WSE to ask them if they could accommodate all or an element of London's housing shortfall. He ought to have written to them asking them the following questions:

- a) can you accommodate all or any element of my unmet need of 6,600 dpa or 66,000 homes for the ten years of the London Plan starting in 2015?; and
- b) looking ahead to the new London Plan can you accommodate all or any element of my unmet need of 1,000dpa or 10,000 homes for the next ten years of the new London Plan starting in 2019?

The Mayor may reply that he did not need to ask these questions because he was confident that he could accommodate all of London's objectively assessed housing need within London's administrative boundary (i.e. 49,000 dpa) by 2025. However, his monitoring of London local plan production ought to have rapidly dispelled this illusion. Had he considered the conclusions of the planning inspectorate scrutinising these plans, examined local authority housing land supplies and housing trajectories, and looked at subsequent rates of completions, it would have become apparent that London was struggling to accommodate 42,000 homes a year, let alone the full OAN of 49,000 or the new target of 66,000.

We have considered the evidence of how the Mayor has engaged with the WSE. Actual documented evidence of what has been discussed is scant. We refer to our representations on this matter where we surveyed the material that was considered at the summits. It is very hard to establish what was discussed precisely in relation to the problem of London's unmet housing need. While the issue of migration was discussed, it appears that the precise issue of London's housing shortfall was never explicitly broached. No doubt, it is an issue that all parties were anxious not to refer to.

The outcome of this is that there is no firm, on paper, commitment from any LPA in the WSE to accommodate any of the current (6,600dpa) or new shortfall (1,000dpa), although some

recently examined or adopted local plans have incorporated allowances through the market signals adjustment for an element of out-migration from London. This is the case with Arun, Ashford and the Waverley Local Plans, although this should not be confused with accommodating a specifically identified element of the unmet need of London.

We note the GLA's response to PQ8, para. 19 onwards. We are aware of the recommendations of the Thames Estuary Growth Commission 2050 and the potential for this corridor, both north and south of the Thames, to contribute to addressing London's shortfall. This proposal, however, is in its infancy, and formal governance arrangements and a structure to take this vision forward are not yet in place.

Similarly, we are conscious of the Cambridge – Milton Keynes – Oxford Growth Corridor initiative. The governance arrangements for this initiative are much more advanced at either end of the corridor with the establishment of the Oxfordshire Growth Board at one end and the Cambridgeshire and Peterborough Combined Authority at the other. Consequently, this has a much stronger potential to contribute to accommodating specific unmet needs emanating from London. However, there is no formal commitment yet on paper specifically committing the LPAs of the corridor to accommodate an element of London's unmet need.

Nevertheless, we agree that the Mayor should write to these groupings of local authorities with a clear request to assist with accommodating all or an element of the 10,000-dwelling shortfall in the new DLP. This is an action for the future immediate Review of the London Plan. We consider this in further under M16. It does not, however, remedy the failure of the Mayor to find a solution to London's housing shortfall by exercising the Duty to Cooperation which requires these actions to have occurred before submission of the DLP. Nor does the DLP meet the positively prepared and effectiveness tests of the NPPF which requires the Mayor to produce a strategy that seeks to meet objectively assessed development needs through effective joint working.

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