



## Planning Committee

19 February 2014

### Report from the Operational Director, Planning & Regeneration

Wards affected:  
All

## Further Alterations to the London Plan– Public Consultation by the Mayor of London

### 1.0 Summary

- 1.1 The Mayor of London is proposing, and consulting upon, Further Alterations to the London Plan. This report explains the key changes from the existing London Plan and highlights the implications for Brent. It also suggests some basic responses to these key planning issues.

### 2.0 Recommendations

- 2.1 That Planning Committee note the proposed alterations to the London Plan as outlined and asks officers to respond to the Mayor's consultation based upon the council's own planning objectives.

### 3.0 Detail

#### Introduction

- 3.1 On January 16<sup>th</sup> 2014 the Mayor of London published Further Alterations to the London Plan (FALP). This proposes some significant changes. The London Plan is one of three key documents (alongside the Mayor's Transport Strategy and Economic Development Strategy) that set out his strategy for development in London. As well as being the overall strategic plan for London, providing the strategic context for Brent's own Local Plan and for the Mayor's own decisions on strategic planning applications, it also legally forms part of the development plan for each London borough and has to be taken into account in determining planning applications. A full copy can be viewed on the Mayor's website at:

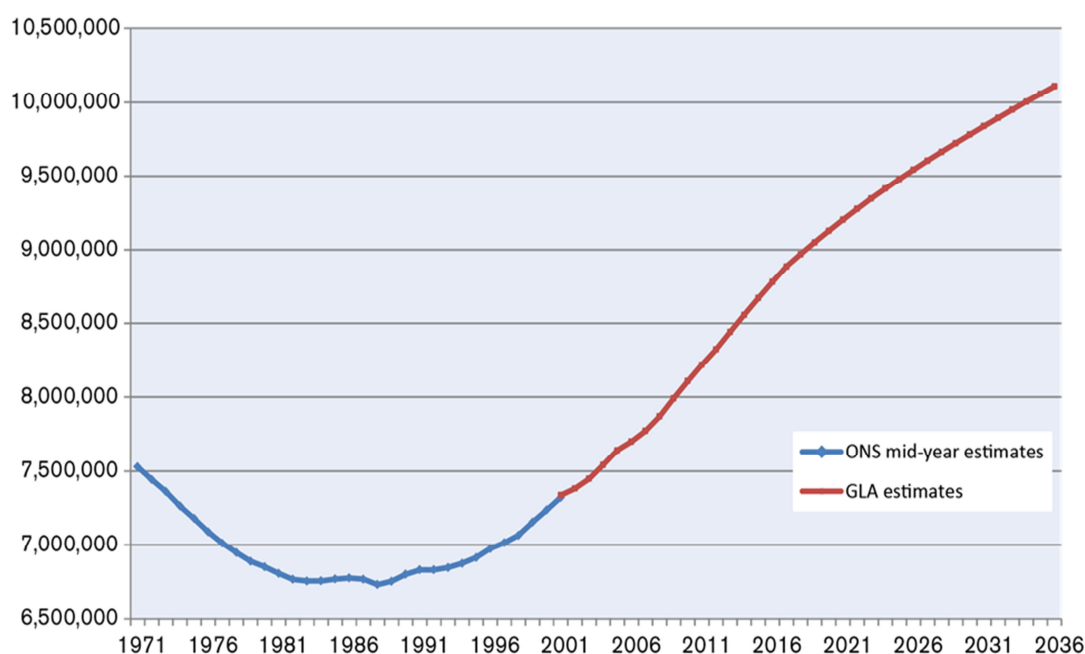
<http://www.london.gov.uk/mayor/publications/2009/05/london-plan-.jsp>

- 3.1 It is important that the Council responds to the consultation, either in support of aspects of the proposed alterations that will benefit the borough or with objections where conflicts with Brent's objectives are identified.

## Key Changes

### Population Growth

- 3.2 The alterations to the London Plan are in the main a response to the changing context within London, especially the key housing and employment issues arising from a substantial increase in population. The population growth that actually occurred in London between 2001 and 2011 was substantially higher than projected in the existing London plan. The 2011 Census showed that between 2001 and 2011, London's population grew by an average of 87,000 per year rather than the projected 51,000 per year. This growth in population is illustrated in the graph below.



Source: Office for National Statistics mid-year estimates to 2001, GLA estimates 2002 to 2036

- 3.2 The population projection that underpins the Alterations to the London Plan shows London's population growing from 8.2 million in 2011 to 10.11 million in 2036. This is a growth of nearly 10%. For Brent the projected population growth is even steeper with a population rise of 25% expected. This has huge implications for planning in Brent. There will be much more pressure on the use of scarce land, particularly for housing but also all of the supporting infrastructure such as schools and health facilities as well as the need to accommodate job creating activities in a sustainable way. Projections suggest that the total number of jobs in London could increase from 4.9 million in 2011 to 5.8 million by 2036.

## Housing

- 3.4 The need to plan for this growth has the most significant implications for individual boroughs in terms of the housing targets that the Mayor is setting through the Alterations. These are derived from a recent assessment of potential housing capacity London-wide undertaken using an agreed formula and involving the boroughs, including Brent. This has resulted in a proposed 33% increase in overall housing targets across London compared to the current targets. Brent's increase is 34% for conventional housing but this rises to 43% when account is taken of non-self contained housing, which is almost completely attributable to the consents for student housing that have been granted in the Wembley area. The headline figure for Brent is now 1,525 new units pa compared to 1,065 previously. The figures for all the boroughs are attached as Appendix 1.
- 3.5 The concern has to be that these targets will be very difficult to meet if development trends from recent years are projected into the future. There will have to be a significant change in the economic climate or some form of increased Government support for house building in order to facilitate the level of development required to deliver the number of units targeted. It may be that the council will have to find more sites for new housing allocations in the borough than previously identified, or that development should be at higher densities than previously allowed, or both. Even then it will be difficult to achieve the housing completion figures necessary, even if sites are allocated. Recent estimates show that there are approximately 8,000 homes with planning consent in the borough which have not been implemented. In other words the planning framework and consents necessary to achieve a higher rate of house building can be satisfied, but other factors are preventing the delivery of new homes.

## Town centres

- 3.6 In response to previous GLA consultation, the council made the case that, in light of the development of the London Designer Outlet and consented major retail street, Wembley and Wembley Park town centre will be effectively one centre, of a scale and with an offer characteristic of a Metropolitan centre as defined in the London Plan. This has in part been reflected in the alterations, which recognised Wembley as performing a strategic retail function of greater than sub-regional importance. However, it is not acknowledged that both Wembley and Wembley Park could potentially change in status to one combined Metropolitan centre. It is recommended that Brent make representations so that it is acknowledged within the London Plan that Wembley has the potential to expand as a single Metropolitan centre.
- 3.7 The alterations include criteria to manage overconcentration of uses having regard to their negative impacts, particularly in regard to betting shops and takeaway. It is proposed that Brent supports this approach which is in line with proposals included in the draft Development Management Policies.

## Employment

- 3.8 The alterations include some changes to the industrial land release map, which show that Hammersmith and Fulham, for example, will now be in a category described as 'Restricted (with exceptional planned release)' rather than merely 'Restricted'. It is proposed to focus release around transport nodes and town centres. One of the

reasons for this is the proposed major release of industrial land in Park Royal at Old Oak, just over the borough boundary south of Willesden Junction station. This release has been accepted by Brent through the process of agreeing a draft Vision for the Old Oak area, although it is expected that this release will be compensated for in a big way by the intensive development in the area for alternative employment opportunities. Old Oak is identified as a new Opportunity Area with the potential to deliver 55,000 new jobs. This is generally supported by Brent, but it is felt the overall job creation figure could be higher as the Vision drawn up for the area estimates that up to 90,000 jobs can be created.

- 3.9 There is no proposed change to the status of Brent in terms of industrial land release, which remains at limited transfer. This is in keeping with the recommendations of Brent's updated Employment Land Demand Study.
- 3.10 The alterations include a requirement to support London's science, technology and telecommunications sectors and ensure availability of a range of workspaces including start-up space, co-working space and 'grow on' space. A requirement is also included to monitor the impact of Permitted Development rights for change of use from office to residential.

### **Proposed Council Response**

- 3.5 Officers have not yet had an opportunity to thoroughly trawl through all the proposed Alterations to the London Plan, but have focussed on the key changes that have been highlighted and which have the biggest implications for Brent. The deadline for responding is 10<sup>th</sup> April so there is some time left to identify further areas where Brent should respond. Committee is asked to agree the basic response to the key areas outlined above and to authorise officers to compile further comments based on the council's own planning and growth objectives and submit these to the Mayor before April 10th.

### **Next Steps**

- 3.42 After the Mayor's consultation period has ended, officers of the GLA will make changes to the draft Alterations and then submit the proposed changes with the Alterations to the Secretary of State for Examination, which is scheduled to take place later in 2014. Those who have made representations may be invited to appear at the Examination if they wish.

## **4.0 Financial Implications**

- 4.1 There are no direct, immediate financial implications arising from the London Plan Alterations. However, there is a clear need in the medium term to review Brent's own Plans and strategies, particularly in identifying new sites for housing and the necessary supporting infrastructure, which will mean a potential increase in the level of resources needed to undertake this work.

## **5.0 Legal Implications**

5.1 The Mayor is required to prepare a spatial strategy (the London Plan) and keep it under review. The process for drawing up and altering the London Plan are set out in the Greater London Authority Act 1999 and Circular 1/2008. Borough Local Plans have to be in general conformity with the London Plan.

## **6.0 Diversity Implications**

6.1 One of the key objectives of the London Plan is to ensure that London is a city of diverse, strong, secure and accessible neighbourhoods. An Integrated Impact Assessment has been prepared alongside the London Plan. This includes an equalities impact assessment.

## **7.0 Staffing/Accommodation Implications**

7.1 The main implications will be to ensure that staff resources are available to review Brent's plans so that they continue to be in general conformity with the London Plan and, in particular, promote the delivery of development necessary to meet the targets within it.

## **8.0 Environmental Implications**

8.1 The London Plan deals with strategic planning across London therefore the implications for the environment are wide reaching. The significant increase in population and, therefore, housing targets means that there is likely to be increased pressure for development on open land, which Brent's own plans seek to protect, as well as the likelihood of development at higher densities with less amenity space.

## **9.0 Background Papers**

London Plan, July 2011

Draft Further Alterations to the London Plan, January 2014

### **Contact Officers**

Any person wishing to inspect the above papers should contact Ken Hullock, Planning & Development 020 8937 5309

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## Appendix 1 London Plan Housing Targets, 2014

Borough	Minimum ten year target 2015-2025	Annual monitoring target 2015-2025
Barking and Dagenham	12,355	1,236
Barnet	23,489	2,349
Bexley	4,457	446
Brent	15,253	1,525
Bromley	6,413	641
Camden	8,892	889
City of London	1,408	141
Croydon	14,348	1,435
Ealing	12,972	1,297
Enfield	7,976	798
Greenwich	26,850	2,685
Hackney	15,988	1,599
Hammersmith and Fulham	10,312	1,031
Haringey	15,019	1,502
Harrow	5,927	593
Havering	11,701	1,170
Hillingdon	5,593	559
Hounslow	8,222	822
Islington	12,641	1,264
Kensington and Chelsea	7,330	733
Kingston upon Thames	6,434	643
Lambeth	15,594	1,559
Lewisham	13,847	1,385
LLDC	14,711	1,471
Merton	4,107	411
Newham	19,945	1,994
Redbridge	11,232	1,123
Richmond upon Thames	3,150	315
Southwark	27,362	2,736
Sutton	3,626	363
Tower Hamlets	39,314	3,931
Waltham Forest	8,620	862
Wandsworth	18,123	1,812
Westminster	10,677	1,068
London total	423,887	42,389