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Mayor of London
London Plan Team
New London Plan
GLA City Hall
London, SE1 2AA

Our ref: NDLP/SK

By email: LondonPlan@london.gov.uk

2 March 2018

Dear Sirs

New Draft London Plan – public consultation 1st December 2017 to 2nd March 2018

Thank you for the opportunity to comment on the New Draft London Plan. We have reviewed the document and on behalf of our clients within Greater London we are pleased to provide the following observations:

Paragraph 0.0.2

We note The Mayor's timescales of the development framework to extend to the next 20-25 years. However, there is an inconsistency in the housing targets for London to only apply to the next ten years. Presumably this is due to the uncertainty over the supply of housing in the 10-25-year timeframe. Despite the proposed plan period, the New Draft London Plan as it stands is incredibly vague on the longer-term timeframe. This puts into question the soundness of a plan which is not justified, as it only provides sufficient housing supply for less than half of the plan period.

A ten-year plan is a short period in the context of planning policy. It is suggested that the New Draft London Plan only applies for a ten-year plan period, or the housing land supply and overall strategy of the New Draft London Plan is reviewed to identify sufficient land to meet longer term housing targets. Given the recent adoption of various London planning authorities' Local Plans, it would be unreasonable for local authorities to have to review this again so soon and with no real benefit to the strategic direction of their plans.

Paragraph 0.0.20

We do not agree with The Mayor's approach to pick and choose elements of national planning policy, and remove strategic decisions of Local Plan making from London planning authorities. The New Draft London Plan is not a strategic spatial plan as it neglects to address essential strategic issues such as London's relationship with the wider region and restricts the detailed work of planning authorities. This would be to the detriment of an effective plan for housing delivery, and conflicts with the duty to cooperate.

The New Draft London Plan fails to be consistent with the National Planning Policy Framework with regard to:



- the lack of a suitable framework that would enable the need for local planning authorities to comply with the duty to co-operate;
- the objective assessment of housing need;
- the assessment of the housing land supply;
- the removal of the need for London planning authorities to prepare the strategic elements of their Local Plans; and
- the London Plan's approach to the Green Belt.

Paragraph 1.4.3

The proposed housing target in the New Draft London Plan does not follow the conventional method of calculation, and it therefore unsound as it is not consistent with national policy.

There is a lack of comparison of the GLA projections and the DHCLG projections for calculating housing need. Given the Planning Practice Guidance has been in effect for several years, the New Draft London Plan needs to take this into account. Further evidence over a longer plan period and justification is required on the final figure.

Given the anticipated publication of the new National Planning Policy Framework very shortly after the end of this consultation period, it is recommended that the option for adopting the standardised methodology is considered and compared against the current proposed housing target. The standardised methodology in its published form would be as a result of the Government's own consultation process. With its emphasis on affordability it should be of particular relevance to Greater London. There would be much benefit in a standard approach to calculating housing need across London, and the wider area.

There is a lack of certainty in the SHLAA on how and where housing will be delivered, where the assessment stretches the guidance on undertaking the SHLAA with regard to large site capacity and phasing, and on the inclusion of windfall sites beyond the 5-year period set out in the guidance. It is not clear why the London SHLAA is undertaken at such a high level.

It is recommended that SHLAAs are done by the relevant planning authority, with their local experience, knowledge and own understanding of the local area. This in turn, as with other local planning authorities, would inform their site allocations part of their Local Plans. If the SHLAA is undertaken at such a high level across London, without the local knowledge, it is questionable whether the land supply and site allocations will be deliverable or achievable at the proposed rate. This is a significant flaw in the approach of the New Draft London Plan, as well as the lack of strategic planning on the distribution of potential housing land supply in relationship to the housing need of a particular area. There does not seem to be any correlation to the land supply of an area and the housing need, calling into question the ability of the New Draft London Plan to deliver the proposed 65,000 dpa.

Paragraph 4.6.11

We agree with the standardised approach to viability assessments; however, it is not clear in paragraph 4.6.11 on existing use value plus (EUV+) whether this would also be standardised. It would be very difficult to provide one value across the whole of London, where values differ greatly for many different reasons. It is suggested that this should be the responsibility of local planning



authorities to determine at a local level given local values and circumstances, as currently the approach would not be effective for the delivery of new development.

Policy D4 Housing quality and standards and Table 3.1

We welcome the proposed consistency to minimum space standards, although consider there should be some flexibility for local planning authorities to take their own view on circumstances where differences could be acceptable. We also consider that the gross internal floor area for one bed/one-person units, which could be either studio or one bed apartments is excessively high. This category should be split into two to allow for studio apartments that have a substantial contribution to the housing land supply.

Policy D6 Optimising housing density

We support the removal of the density matrix from the New Draft London Plan, as it is currently applied too prescriptively. We welcome a more flexible approach, provided that Council's see it as an opportunity to deliver more housing development on a site by site basis. There is question over the compatibility of this policy and how the site capacities were determined for large and small sites in the SHLAA.

Policy D8 Tall Buildings

Whilst we support the proposed increase in higher density housing and tall buildings, we do not believe that this approach has been fully tested in relation to site capacity through the SHLAA, or how to assess what height would be suitable in certain locations. Much of London is suburban and tall buildings that are out of keeping with the character are likely to receive significant objection from the local community, which can be a difficulty in securing planning permission. However, for sites with very good accessibility or in regeneration schemes, taller buildings will recognisably play an effective role in delivering housing.

This policy is considered to be unsound as it would be ineffective. More work is required to support this policy, which ultimately should have a positive knock-on effect to the overall strategy of the New Draft London Plan and considering whether the estimated housing land supply can deliver the level of housing need.

Policy T6 Car Parking

We generally welcome the increased flexibility on parking in relation to accessibility, with the emphasis on delivery. However, we do also consider that some caution needs to be recognised that one size does not fit all, depending on the local area, type of housing and so on. We suggest that local planning authorities should be responsible for assessing the needs in their areas and setting appropriate standards.

We trust that you find the above to be of assistance.

Yours faithfully
BELL CORNWELL LLP

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