



**CLARION**  
HOUSING GROUP

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## **Clarion's comments to the Draft London Plan**

Clarion Housing Group is the largest housing association in England with 125,000 homes across the country. We work in 26 London Boroughs providing 51,000 homes for nearly 100,000 Londoners. As one of the Mayor's strategic housing partners, we have an ambitious programme to build 50,000 homes across the country in ten years, 20,000 of which will be in London in recognition of the Capital's extensive housing need. As a major landlord and a property developer we are highly supportive of the Mayor's aims set out within the Draft London Plan.

The majority of our London homes (65%) are located in the outer boroughs. For the last few years we have built homes across London but opportunity areas are more likely to emerge in outer London boroughs. Our current pipeline of 4000 approved or on-site homes has a greater proportion of new units in the outer boroughs (77.5%) so this distribution of stock will continue. We agree there are many opportunities for intensifying residential developments in suburban locations and co-locating residential and retail use but this is reliant on current and future public transport provision if it is to facilitate car-free and car-lite developments.

We have high concentrations of stock in Bromley, Merton, Sutton, Waltham Forest and Croydon. These are all boroughs seeing their housing targets increase by more than 100%. The proposed London housing targets understandably increase pressure on the outer boroughs to intensify. This will lead to more competition to access GPs, schools and other local infrastructure, increased congestion and heavier use of green spaces. As this is where most of Clarion's residents live, the capacity of neighbourhood amenities needs parallel upscaling if they are not to be negatively affected by the new homes in their locality. The London Borough of Ealing is a good example of neighbourhood intensification supporting high street revitalisation (Clarion's Sherwood Close is part of the West Ealing Centre Neighbourhood Forum housing-led regeneration).

Earlier Plans refer to the Lifetime Neighbourhoods concept which promotes a balance of facilities at a local neighbourhood level, embedded in the process of neighbourhood planning. The Mayor's Good Growth principles address similar issues but greater clarity is needed on practical implementation, resolving the contradictions such as optimising density whilst maximising sustainable green infrastructure, and how the Capital wide targets might be resolved at a local level.

We welcome the Mayor's ambitious housing delivery targets but feel careful planning is still needed on the mix of homes to be built and where these different housing types are located. There is a tension between housing need, site capacity and current and planned transport infrastructure in inner and outer London. The Plan should recognise that areas across zone 3-6 have very variable housing potential (e.g. Tottenham Hale with obviously strong transport links or Sutton where Clarion and the Borough have built over 800 new homes despite poorer transport links).

Encouragingly, our residents recognise that new development is required. In our 2017 residents' survey<sup>1</sup> 75% of our residents said it is important that Clarion builds more homes. Tellingly, 49% of households with children living at home support building on greenfield sites. This rises to 52% for residents aged 18 – 32, suggesting a careful reassessment of disused green belt land would be welcomed by many Londoners if it were to free up space in London for housing. Whilst we understand the Mayor wanting to protect the Green Belt, it is important to remember that parts of it are of poor environmental quality. We feel the Mayor is constraining himself in his aims to double housing delivery whilst protecting the green belt and strategic industrial land.

As one of the GLAs strategic partners and a housing association committed to housing the diversity of London's population, we build on the basis of housing need at every price point. This means we have a broad understanding of affordability and we feel that even the new London Living Rent and London Affordable Rent will still be unaffordable for many of our low paid residents.

Our extensive three estate regeneration programme in Merton illustrates our commitment to long-term placemaking which is best achieved when housing associations, developers, local authorities and local communities are united. We are pleased that the Mayor is to assess the suitability of estate regeneration plans on provision of equivalent floor space for affordable housing alongside the housing numbers and mix. A similar balanced approach is needed in evaluating like-for-like replacement on a social rent basis. We also have concerns that the blanket requirement for ballots in the Mayor's new guidance [Better Homes for Local People](#) will result in abortive costs and slow down already long drawn out regeneration programmes. Ballots only provide a snapshot decision at one point in an ongoing iterative process of consultation. The unintended consequences of ballots might be situations where the rational decision is for housing associations to halt regeneration plans and instead seek to sell estates in need of substantial remodelling.

The requirements for robust fire safety statements from the outset of a design are vital, as is the need to monitor the quality of construction throughout the build process. We welcome the Mayor's emphasis on quality of design but the quality of build needs a similar emphasis. The London Plan must respond to the significant shift in approaches to fire safety regulation underway. Early indications are emerging and the Plan's policies must be closely aligned with national policy and the outcome of the Hackett Review. The policies should be worded to encourage rapid enacting and embedding of these regulation changes.

The greater design scrutiny of proposals and requirement for management plans will improve the quality and long-term success of new housing. Yet while well established mechanisms exist to assess design quality, such as design review panels, design codes or design-led density assessments, these will require additional resource both within the GLA and the Boroughs to scrutinise the increased volume of schemes.

We are committed to working with the GLA, the Boroughs, and other stakeholders to deliver the Mayor's new London Plan. Our detailed comments below are where policy wording of the Plan could be clarified and I trust our comments will be useful to you. If you have any queries or require any additional information, please do not hesitate to contact me.

Yours sincerely

Austen Reid  
**Group Director of Development**

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<sup>1</sup> <https://www.clarionhg.com/digital-index-2017/>

### **Chapter 3: Design**

<b>Proposed policy</b>	<b>Suggested alteration to policy and explanation</b>
<p><b><u>Policy D2 Delivering good design:</u></b>  <b>Clause D2-B</b>  <i>“The outcome of this process must ensure the most efficient use of land is made so that development on all sites is optimised.”</i></p>	<p>The proposed factors the Plan lists to consider when determining an area's capacity for growth are comprehensive and appropriate and the reference to other policies is good. However the use of 'optimise' in assessing how land is used needs clarification. E.g. Policy H12 refers to optimising the housing potential of sites, and Policy D6-A that residential developments that do not optimise density should be refused. An assessment of non-residential neighbourhood amenities and the surrounding context is required to influence what is considered an optimal solution for an individual site.</p> <p><b>Clause D2-B Replace with: <i>development is optimised across sites in a borough to reflect the needs of housing, employment, education and recreation.</i></b></p>
<p><b>Clause D2-H 4)</b>  <i>“local planning authorities using architect retention clauses in legal agreements where appropriate.”</i></p>	<p>While this may be best practice it is not common practice due to the specialisms of different architects. Those normally employed in the earlier stages of design tend to be appointed for their skills in master planning and concept design. Whereas at the point of construction, architects with more site experience in producing working drawings are used.</p> <p>Para 3.2.10 describes that consideration should be given to alternative ways of securing the design team's ongoing involvement in a scheme.</p> <p><b>Clause D2–H 4) Add: <i>and where this will not hamper the detailed design process.</i></b></p>
<p><b><u>Policy D4 Housing quality and standards:</u></b>  <b>Clause D4-A</b> <i>“In ensuring high quality design, housing developments should consider the elements that enable the home to become a comfortable place of retreat and should not differentiate between housing tenures”.</i></p>	<p>The guidance that the Mayor will produce on the implementation of this policy for all housing tenures has to reflect the impact of services charges and the requirements for management plans set out in Policy D6 C para 3.6.8. The design of housing developments must consider this as well.</p> <p><b>Clause D4-A Add: <i>While tenure blind-design to maximise tenure-integration is desirable, and poor doors or other tenure distinguishing features should be avoided, the design must respond to the varied management regimes required rather than assume that a pepper potting approach will be acceptable.</i></b></p>
<p><b>Clause D4-D</b>  <i>“Housing developments are required to meet the minimum [space] standards below. These standards apply to all tenures and all residential</i></p>	<p>It is positive that London's space standards are tenure blind, countering the former disparity between small flats being sold on the market and provision of grant funded homes of adequate sizes. We know from a housing management perspective that social housing tenants may be in</p>

<p><i>accommodation that is self-contained.</i></p>	<p>their homes for a large proportion of the day and due to allocation policies will be occupying homes at the design levels of occupancy. These levels of intense occupancy require more than just compliance with the space standards but also careful design, layout, good quality material and robust details.</p>
<p><b><u>Policy D5 Accessible housing:</u></b>  <b>Clause D5-A</b>  <i>"1) At least 10 per cent of new build dwellings meet Building Regulation requirement M4(3) 'wheelchair user dwellings', i.e. designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users.</i>  <i>2) All other new build dwellings meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'."</i></p>	<p>We support the commitment that new homes in London are both accessible and adaptable. However demand for wheelchair user / adaptable homes can vary over time in a location. It can be more helpful to the Borough to be able to rapidly allocate a home to general needs social housing (possibly as a temporary measure) if they are unable to nominate a suitable occupant rather than have it stand empty.</p> <p><b>D5-A 3) Add: <i>Planning conditions related to M4(3) dwellings should contain the flexibility to alter the allocation of the home for general needs use if there isn't current immediate demand for it as a wheelchair user dwelling.</i></b></p>
<p><b><u>Policy D6 Optimising housing density:</u></b>  <i>The density matrix has been removed in favour of 'optimising housing density' and the idea of design-led planning, with design based scheme specific appraisals. Higher density which requires higher qualitative and design scrutiny.</i>  <b>Clause D6-A</b> <i>"Residential developments that do not optimise density will be refused."</i></p>	<p>The idea of design-led planning, and design based scheme specific appraisals is welcome but will require additional resources and upskilling of many Borough planning staff. Increased qualitative design scrutiny may increase the time required to consider applications.</p> <p>Assessing the appropriate density for a site is an outcome of balancing physical factors, unit numbers, size, tenure mix, neighbourhood context as well as economic and financial ones. Compliance with all the other polices related to these factors may not be possible.</p> <p>The reinstatement of a revised version of the density matrix is desirable both to ensure that new development achieves the overall balanced principles of Sustainable Residential Quality included in earlier plans, and to facilitate the Mayor's principles for Good Growth. The suggestion that the matrix continues to be used for initial discussion of density ranges is positive, yet its omission from the Plan undermines its status as a planning tool. Retaining the density thresholds as a minimum matrix could minimise opposition to development, particularly in outer London Boroughs. The density ranges for suburban areas could be reconsidered to aid intensification in suitable location (around transport hubs) in the outer Boroughs.</p> <p><b>Clause D6-A Add: <i>Table 3.2 Density Matrix from the current London Plan with revised suburban ranges.</i></b></p>
<p><b>Clause D6-C</b>  <i>"The higher the density of a development, the</i></p>	<p>As densities increase the importance of good design and quality of build increases – if these are</p>

<p><i>greater the level of scrutiny that is required of its design, particularly the qualitative aspects of the development design described in Policy D4 Housing quality and standards, and the proposed ongoing management.”</i></p>	<p>achieved then the success of higher density homes is more likely. Achieving quality of build should be a strategic objective.</p> <p><b>Clause D6-C Add: <i>and the quality of construction and components.</i></b></p>
<p><b>Clause D6-C para 3.6.8</b>  <i>“Development proposals with a residential component that are referable to the Mayor must ... submit a management plan if the proposed density is above”</i></p> <ul style="list-style-type: none"> <li>➤ 110 units per hectare in areas of PTAL 0 to 1</li> <li>➤ 240 units per hectare in areas of PTAL 2 to 3</li> <li>➤ 405 units per hectare in areas of PTAL 4 to 6</li> </ul>	<p>The requirement of management plans considering affordability, running costs and service charges for high density homes is very welcome. Yet increased density doesn't necessarily increase service charges as the greater number and mix of occupants changes the apportionments of charges achieving economy of scale. Naturally there are service costs associated with more complex M&amp;E equipment or specialist equipment such as fire systems, which may increase with taller buildings. These will require a robust servicing regime and as such will be service chargeable. The thresholds above which applicants should submit a management plan relate solely to units per hectare and PTAL, not the other locational components of the density matrix.</p> <p><b>Clause D6-C Clarify: <i>Clarification of what management plans will contain is required.</i></b></p> <p><b>Clause D6-C Add: <i>A similar approach to management plans would be considered best practice for schemes below the density / PTAL thresholds.</i></b></p> <p><b>Clause D6-CAdd: <i>Management plan to take account of the housing design standards polices D4, H5, H7 and H12.</i></b></p>
<p><b><u>Policy D11 Fire safety:</u></b></p>	<p>The London Plan needs to be able to respond to the significant shift in the approach to fire safety regulation underway. Early indications for this will emerge over the next 12 months as the recommendations of the Hackett Review are announced so the Plan's polices must be closely aligned with national policy and the outcome of this Review.. The Plan polices should be worded to encourage the regulation changes to be implemented rapidly</p>
<p><b>Clause D11-B</b>  <i>All major development proposals should be submitted with a Fire Statement, which is an independent fire strategy, produced by a third party suitably qualified assessor.</i></p>	<p>Wording the requirement for a Fire Statement as 'should' makes this less enforceable and unlikely to be implemented.</p> <p><b>Clause D11-B Replace: <i>All major development proposals must be submitted with a Fire Statement</i></b></p>
<p><i>It is proposed that applications for all major</i></p>	

<p><i>developments will have to be accompanied by an independent fire statement produced by a qualified third party assessor, setting out how the 'highest standards' will be achieved.</i></p>	<p>Insisting on fire statements only from external third party assessors is unnecessary and could needlessly increase costs. What's important is that the person is qualified and competent with the experience to address the complexity of the design being proposed / built, not if they are internal or external to the business. It is imperative that one competent person is accountable for fire safety from inception to completion, not just the design stage. There are advantages as an internal employee understands the needs of a business and client constraints / risks which is not the case when appointing externally.</p> <p><b>Clause D11-B Replace with: <i>produced by a suitable qualified assessor, either a third party or an internal appointment, with demonstrable experience.</i></b></p>
<p><b>Clause D11B –1)</b> <i>The statement should detail how the development proposal will function in terms of:</i>  <b>1) the building's construction: methods, products and materials used</b></p>	<p>Para 3.11.1. The principle behind explicitly considering fire safety from the very outset is incontestable. However even when the fire strategy is considered before building control application stage there are occasions when this strategy gets changed, amended or even value engineered out by the contractor. Para 3.11.2 rightly emphasises the need to embed and integrate the fire strategy within the design but what is needed are enforcement mechanisms; clear sanctions and regulations that a fire strategy agreed on a building at design stage is delivered to completion.</p> <p><b>Clause D11-B 1) Add: <i>and quality of construction from a fire perspective throughout the build, by a competent person with responsibility for Regulation 38</i></b></p> <p><b>Clause D11-B 6) Add: <i>This Fire Statement needs to contain a plan for the provision of monitoring compliance at all stages in the construction handover and during occupancy.</i></b></p>
<p><b>Para 3.11.3</b> <i>"sprinklers installed in buildings can reduce the risk to life and significantly reduce the degree of damage caused by fire"</i></p>	<p>Approved document B (section 0.16) already promotes installation of sprinklers in this way but it is rarely taken up unless it is a requirement. It is likely suppression systems will become a requirement for housing in England to mirror legalisation in Scotland and Wales.</p> <p><b>Para 3.11.3 Replace with: <i>Suitable suppression systems... must be explored at an early stage of building design.</i></b></p>

## **Chapter 4: Housing**

<b>Proposed policy</b>	<b>Suggested alteration to policy and explanation</b>
<p><b><u>Policy H1 Increasing housing supply:</u></b>  <b><u>Clause H1-A Housing targets</u></b>  <i>Aim to build a minimum of just under 65000 homes per year for ten years, applying significantly increased targets particularly for some outer-London boroughs including Bexley, Bromley, Croydon, Ealing, Enfield, Greenwich, Hillingdon, Hounslow, Kingston, Merton, Richmond, Sutton and Waltham Forest seeing their housing requirement increase by more than 100%.</i></p>	<p>We support the ambitious housing targets but question the assumption that all the Capital's housing needs can be met from intensification without any use of green belt land or reliance on any contribution from outside the London boundary. However, we recognise the significant potential in outer Boroughs to develop on brownfield sites or intensify to meet the targets. This is reliant on the political will locally to support development, local authorities releasing land. Expectations for doubling housing delivery from year one is unrealistic, a taper or stepped delivery target to scale up is both more realistic and should be published along side the annual update housing trajectories.</p> <p>Policy SD2 is explicit about the collaboration required across the wider South East and detailing the Mayor's statutory Duties to Inform and Consult surrounding authorities. The duty to co-operate between the GLA and London boroughs needs to be similarly explicit to overcome political and practical complexities. Policy GG6 refers to the integrated delivery of strategic and local infrastructure across private and public sectors and the community. The Plan needs to set out a deliverable strategy concerning the duty to co-operate between the GLA and the boroughs. Waste plans, flood risk and joint waterways strategies for are mentioned in the Plan but greater emphasis is needed on co-operation for increasing housing numbers.</p> <p>We support a national standard approach to assessing housing need and setting clear ambitious targets for London councils. However, the type of homes required is as important as the number of homes, particularly in terms of affordability and tenure. A methodology based on house prices and household incomes obscures the extent that housing need and affordability are shaped by rental affordability. For consistency, the Mayor's allocation of housing targets has to follow the Government's new proposed standardised methodology for assessing objectively assessed need.</p> <p><b><u>Clause H1-D) Add: Require Boroughs to publish plans for practical support for scaling up delivery rapidly within their development plans.</u></b></p>
<p><b><u>Policy H4 Meanwhile use:</u></b>  <i>Boroughs are encouraged to identify opportunities for the meanwhile use of sites for housing to make efficient use of land while it is awaiting longer-term development, such as for precision manufactured homes.</i></p>	<p>The idea of meanwhile homes needs to be treated with caution. It's an indication of the extent of immediate housing pressure that this is being considered. Re-locatable volumetric homes may provide a small number of temporary homes across the capital, but the realistic timeframe for their use needs to be considered very carefully. If the housing is short lived then the residents are unlikely to establish neighbourhood connections, find local work before they are dispersed and the</p>

	<p>meanwhile housing is an unsatisfactory stopgap, resulting in disruption to children's education or support networks. If it is being used as part of a larger phasing decanting process, there should be better ways of managing residents temporary moves – Clarion's intention is that existing residents in regeneration projects move only once. Equally the long life of post war prefab's show that temporary homes have an unfortunate habit of becoming permanent. If a site is not suitable for residential housing, or there are concerns about the risk to residents of short term nature of the homes then another meanwhile use would be preferable.</p> <p><b>Policy H4 Replace: Borough should identify opportunities for the meanwhile use of sites for housing if they can demonstrate that they have carefully considered the negative impact on residents of temporary allocations and have plans to mitigate these.</b></p>
<p><b><u>Policy H5 Delivering affordable housing</u></b></p>	<p>We expect to deliver at least 5,000 high quality, new affordable homes in the capital by 2021, 30% of which will be at genuinely affordable rents with 70% for shared ownership. However whilst we are prepared to deliver 50% affordable homes across future pipeline sites (even though it can impact viability) fast-tracking applications on public land which match this criteria and providing additional subsidy would ease viability and enable us to provide increased affordable housing provision.</p>
<p><b><u>Policy H6 Threshold approach to applications:</u></b></p>	<p>Clarion has commented in detail on the threshold approach in our submission on the Mayor's Housing Supplementary Planning Guidance (SPG): The recently established London Housing threshold approach conditional on percentage of affordable homes appears to be working at the strategic scale, with greater transparency over the viability mechanisms. Whether it provides a fast track route is yet unclear and there still needs to be recognition that land values will need to adjust.</p> <p>The application of the approach does vary across individual Boroughs who need to make clear to developers what is expected and then not to deviate from that position.</p>
<p><b>Clause H6-I</b>  <i>"Any proposed amendments that result in a reduction in affordable housing, affordability or other obligations or requirements of the original permission should be rigorously assessed under the Viability Tested Route. In such instances, a full viability review should be undertaken that reconsiders the value, costs, profit requirements and</i></p>	<p>It is acceptable that reductions in the agreed amount of affordable housing subject to grant should be re-assessed, and if the scheme is large enough, be referred to the Mayor. However the wording of Clause H6-I to include other obligations or requirements of the original permission is onerous, especially if the suggestion that a full viability review would be required.</p> <p><b>Clause H6-I Delete: other obligations or requirements of the original permission</b></p>



<p><i>land value of the scheme.”</i></p>	
<p><b><u>Policy H7 Affordable housing tenure:</u></b>  <i>The following split of affordable products should be applied to development (to be reviewed in 2021):          London Affordable/Social Rent = 30%          Shared Ownership/London Living Rent = 30%          To be determined by the relevant borough based on identified need, provided they are consistent with the definition of affordable housing = 40% (with a presumption towards affordable/social rent).          London Living Rent &amp; Discount Market Rent to have £60k household affordability cap.          Shared Ownership and Discount Market Sale to have £90k household affordability cap.          The Mayor's preference is for London Living Rent, London Affordable Rent (more in line with social rent) and London Shared Ownership.</i></p>	<p>As a housing association, we understand the need for a variety of housing products to suit different needs for both sale and rent. We are particularly supportive of the London Affordable Rent which recognises the need for a genuinely affordable rental product linked to what people on lower incomes can afford rather than out-of-control market rents.          We are also committed to a programme of Shared Ownership which in our experience continues to provide an affordable and well understood route into home ownership. Yet it is important to recognise that having multiple products can lead to competition between similar housing products, and flexibility is required to move between various products depending on the local market.</p>
<p><b><u>Policy H8 Monitoring of affordable housing:</u></b>  <i>Boroughs are required to have clear monitoring processes to ensure that the affordable housing secured on or off site is delivered in line with the Section 106 agreement and that any cash in lieu payments are used to deliver additional affordable housing.</i></p>	<p>We agree with the need to monitor delivery of affordable housing and other contributions          Developers' obligations in the form of S106 and Mayoral and local CIL contributions have to be negotiated transparently and published. CIL levels need to be set at realistic levels, reviewed regularly so as not act as a barrier to development. The community-based contributions from developers such as housing associations or Community Land Trusts or social purpose vehicles which enable affordable housing to function well should be monitored and recognised.</p>
<p><b><u>Policy H10 Redevelopment of existing housing and estate regeneration:</u></b>  <b><u>Clause H10-A</u></b>  <i>Loss of existing housing is generally only acceptable where the housing is replaced at existing or higher densities with at least the equivalent level of overall floor space</i></p>	<p>It is positive that the Mayor is committed to monitor the numbers of homes demolished and replaced and that replacement of affordable homes is on the basis of floor space rather than numbers of units replaced. Policy D6- D refers to the measures of density required for a proposal (all schemes to provide number of units per hectare; number of habitable rooms per hectare; number of bedrooms per hectare; and number of bed-spaces per hectare.)          We feel that floor space is the best measure to be considered alongside unit mix and sizes, and that the Best Practice Guidance "Better Homes for Local People" acknowledges that floorspace is an issue to be discussed with residents.          However the wording in the Plan that calls for existing or higher densities at equivalent floor space</p>

	<p>leads to the risk to provision of the same floor space subdivided into smaller (typically one bed / studio) units. This may achieve the aim to increase overall number of affordable housing units or avoid net loss of floor space but may not provide the mix and size of homes that a scheme needs. Clarion's Sherwood Close scheme in Ealing is an example which replaces an inappropriate unit mix (60% single bed units / bedsits) with a greater mixture of one and two bed homes, closer meeting the existing community's needs within the same floor space. Residents who wish to return to a regenerated scheme may want to downsize or have more space for a larger family, so it can not be assumed that the bedspace requirement for social tenants will remain the same during the programme of the regeneration. Delivering a suitable mix for new or future residents is equally important.</p> <p><b>Clause H10-A</b>  <b>Clarify: <i>That the measure of density reflects a balance of units, habitable rooms, bedrooms and bedspaces suitable to the needs of the regeneration scheme, and that the balance may need to be adjusted to accommodate the needs of the existing residents who want to return to the estate and future residents.</i></b></p>
<p><b>Clause H10-B</b>  <i>"Where loss of existing affordable housing is proposed, it should not be permitted unless it is replaced by equivalent or better quality accommodation,:"</i></p>	<p>London's housing stock is ageing. While most social housing estates meet the Decent Homes Standard, many are increasingly failing to meet modern expectations and nearing the end of their useful lives. The replacement of poor quality unsatisfactory or unsuitable homes with ones of a better quality is a key reason for regeneration. We are committed to maintaining the quality of our assets and ensuring that our residents are living in good quality homes.</p>
	<p>The existing London plan para 3.82 is far more responsive to the particular local housing need and overarching regeneration aims of fostering a more balanced mix of tenure and incomes. It also recognises that redevelopment of a particular scheme or estate needs to be seen as part of a wider picture of the regeneration of larger areas. So we would wish to see the retention of the existing London plan para 3.82 ensuring that these local circumstances and contribution to a boroughs wider plans are taken into account.</p> <p><b>Clause H10-B) Add: <i>The following local circumstances and contribution to a Borough's wider regeneration plans should be are taken into account when considering the mix of housing provided. These include:</i></b></p> <ul style="list-style-type: none"> <li><b>• <i>the regeneration benefits to the local community;</i></b></li> <li><b>• <i>the proportion of affordable housing in the surrounding area and the need to provide mixed and balanced communities; and</i></b></li> </ul>

<p><b>Clause H11-C</b>  <i>“for estate regeneration the existing affordable housing floor space should be replaced on an equivalent basis ie where social rented floorspace is lost, it should be replaced by general needs rented accommodation with rents at levels based on that which has been lost and the delivery of additional affordable housing should be maximised.”</i></p>	<p><b>• the amount of affordable housing intended to be provided elsewhere in the borough.</b></p> <p>The comment above sets out the detailed clarification needed around like-for-like replacement of space and that floor space is the best measure. There is a similar issue, requiring clarification, about rent levels and tenure of the new homes. We'd agree with the principle of maintaining at least the same number of rental homes for households on low incomes. Affordable housing current includes a mix of products (the NPPF current definition covers rental homes at social rent (London Affordable Rent), affordable rent or other Low Cost Home Ownership products such as London Living Rent or Shared Ownership Rent levels in different products may be similar but under different tenure conditions. Delivering the maximum additional housing may require a mix of these affordable products. This diversity of products means that over time when residents move out, the most suitable tenure need can be reassessed. Fixing a tenure type in perpetuity might limit future responsiveness. .</p>
<p><b>Para 4.10.3</b>  <i>In some cases, regeneration will include the loss and replacement of homes and it is important that any such scheme is delivered with existing and new residents and communities in mind. This is particularly pertinent for estate regeneration, and any proposals for such schemes should take account of the requirements of the <b>Mayor's Good Practice Guide</b>.</i></p>	<p>We believe that we are already able to work with our residents in a variety of ways to ensure that the majority of occupants feel reasonable solutions are achieved. We already record and demonstrate that we are acting on the outcomes of resident engagement / consultations. Sometimes ballots might be a useful approach but not as a blanket measure and we know that working closely with residents is the only way that schemes will proceed successfully. Much of the suggested good regeneration practice in the Mayor's guidance is actually normal practice for housing associations (See g15 response to the Draft Estate Regeneration Guidance and <a href="#">“Meeting the Challenges of Urban Renewal”</a> report) so for example, Clarion's existing approach is to make all occupants (leaseholder included) a fair and reasonable offer (see <a href="#">Clarion's Merton offer</a>) within the cost and affordability envelope.</p> <p>We support the aims and intentions of the Mayor Best Practice Guide but as our response to the consultation on “Proposed new funding condition to require resident ballots in estate regeneration” explores in detail we are concerned that a blanket requirement for ballots for GLA funded redevelopment will have unintended consequences:</p> <ul style="list-style-type: none"> <li>• The proposed eligibility criteria for ballots are complicated to verify. We have concerns about the difficulty of confirming who is eligible to vote, and the potential for dissention that might arise from close results, potential fraudulent eligibility or coercion that might occur.</li> <li>• A ballot gives non-social leaseholders and homeowners the power to veto whether social housing gets investment. They will have different motivations in a vote.</li> <li>• A ballot can only be a subjective snapshot at one point in time – the timing will be very</li> </ul>

	<p>sensitive. It risks being a referendum on a complex matter at a point where it is unlikely that a holistic picture of the scheme will be known. We feel it is better to have a continuous process of collective decision making throughout the whole process rather than a stop / go decision relatively early on.</p> <ul style="list-style-type: none"> <li>• Ballots will slow down and increase the risk in what are already long drawn out, and uncertain regeneration programmes, and are a disincentive to investing early on in the process at just the point when the focus should be on investigating residents' needs and exploring the underpinning master planning principles. If the ballot fails then there will be abortive costs against any possible works to the estate. For some schemes refurbishment isn't an option, and 'do nothing' is just as undesirable, but once a no vote has been made, removing the option for any demolition will mean that any regeneration plans will halt.</li> <li>• These increased risks may restrict the appetite to proceed with plans to improve existing estates leaving residents in poor quality accommodation or for landlords to seek to sell estates which are in need of substantial remodelling.</li> </ul> <p>Until these detailed aspects of the Best Practice Guide are resolved (in line with MCH:LG's over regeneration guidance) their inclusion in the London plan may restrict the progress and appetite for further regeneration schemes in the Capital.</p> <p><b>Para 4.10.3: Add: wherever possible.</b></p>
<p><b><u>Policy H12 Housing size mix:</u></b>  <i>Generally, schemes consisting mainly of one-person units and/or one bedroom units should be resisted. Boroughs should not set 'prescriptive' dwelling mix guidance for market and intermediate schemes.</i></p>	<p>We agree that two bedroom properties are the size most in demand in many areas of London; however there are still areas – Tower Hamlets in particular - where we find that larger family houses are still required. We agree that Boroughs should provide guidance on size of units required policy as H12-D but the wording of para 4.12.3 risks encouraging two bedroom units to be defined as family units without sufficient consideration of the requirement for larger family homes</p> <p><b>para 4.12.3 Add: taking into account local current and future needs for large family homes with more than two bedrooms.</b></p>

## **Chapter 8: Green Infrastructure and Natural Environment**

<b>Proposed policy</b>	<b>Suggested alteration to policy and explanation</b>
<p><b><i>Policy G1 Green infrastructure:</i></b>  <i>Manifesto commitment that London to be 50% green by 2050</i></p>	<p>The principle of increasing London's green infrastructure is very welcome but the Mayor's manifesto commitment to doubling green space must be implemented in a creative non-proscriptive way. Much of the loss of London's green space is not through major development but incremental loss from individuals paving or decking over their gardens. Care must be taken that developers are not required to address loss of habitat that individuals choose to do. Similarly this will increase the competition for roof space. Green roofs will be in conflict with the desire to fit solar panels. We look forward to commenting on the updated SPG on the All London Green Grid.</p>
<p><b><i>Policy G3 Metropolitan Open Land:</i></b>  <i>Metropolitan Open Land (MOL) should be protected from inappropriate development:</i></p>	<p>The Capital's increasing population densities intensifies the usage of, and pressure on Metropolitan Open Land. As with the Green Belt a careful review of its role and significance is desirable particularly in areas targeted at housing growth.</p>
<p><b><i>Policy G5 Urban Greening</i></b></p>	<p>There are concerns about the ways that the new Urban Greening Factor has been devised and is to be used in built up areas. For example lawns, trees, and green walls are all considered to have the same impact. The application of the UGF and the recommended target score of 0.4. for residential schemes needs to reflect compromise arising from existing urban fabric and form e.g. it may be difficult to achieve for tower blocks in dense urban areas without more intensive green roofs. This may be in conflict with the desire to fit solar panels.</p> <p><b><i>Clause G5-B Add that the UFG will be adapted to distinguish between different green elements</i></b></p>

## **Chapter 9: Sustainable Infrastructure**

<b>Proposed policy</b>	<b>Suggested alteration to policy and explanation</b>
<p><b><i>Policy SI1 Improving air quality:</i></b>  <i>Air Quality Assessments (AQAs) should be submitted with all major developments (150 units+), unless they can demonstrate that transport and building emissions will be less than the previous or existing use.</i></p>	<p>The Mayor's greater focus on air quality is welcomed. More detail is needed to define "Air Quality Positive" scheme to help drive designs in the right direction from concept stage onwards.</p> <p><b><i>Clause SI 1– A3) Clarify: Guidance will be provided what measures will be taken to constitute an air quality positive development.</i></b></p>
<p><b><i>Policy S12 Minimising greenhouse gas</i></b></p>	

<p><b>emissions:</b>  <i>Major developments to include detailed energy strategy demonstrating how zero carbon target will be met. Promoting Building Research Establishment Environmental Assessment Method (BREEAM) - Achieving energy credits as part of a BREEAM rating can help demonstrate that energy efficiency targets have been met.</i></p>	<p>We welcome that the zero carbon targets are maintained, but feel the targets should consider 'unregulated' energy use of buildings within the 10% target reduction for homes through energy-efficiency measures (15% for non-residential). We would see this complimenting the fabric first approach which we feel is both appropriate and achievable.</p> <p>Footnote on page 327 suggests that £95/tonne should be used for carbon off-set fees. Care should be taken in reviewing the existing off-set arrangements first, as this approach is not implemented fully at present with all boroughs. Further consideration is need on how the off-set funds could be applied for to improve existing social housing stock.</p> <p>There are also issues with the carbon factors used in the Part L calculations (SAP and SBEM) being significantly higher than achieved in reality, especially for electricity. It is hoped that the building regulations will be updated with improved carbon factors before the new London Plan comes into effect, but we hope that the GLA will lobby MHCLG and BEIS to update the carbon factors as soon as possible.</p> <p>We feel that simple less prescriptive, performance based requirements for energy performance - with an example and then the opportunity to demonstrate how the provider is able to deliver in an alternative way will be more conducive to improvements in energy efficiency across all size, scale and complexity of developments.</p>
	<p>Para 9.2.9 asks for major developments to monitor and report energy performance for at least five years. While this is easy for public buildings through Display Energy Certificates (DECs), there is no standard measure or approach for residential properties. The approach needs clarifying by the GLA.</p> <p><b>Para 9.2.9 Clarify: How this approach will apply to residential properties – particularly private sale dwellings where it will be difficult to get the information required</b></p>
<p><b>Policy SI3 Energy infrastructure:</b>  <i>Energy masterplans should be developed for large-scale development locations which establish the most effective energy supply options.</i></p>	<p>While we support the intent of this policy and heat networks, there are a number of issues needing further investigation: To get the most out of heat networks there needs to be a body to link up schemes – a heat network equivalent to the utilities network companies - to manage the network infrastructure and legal issues of connections. There is also the issues around the current use of gas which is likely to be more carbon intensive as the grid is decarbonised and electricity becomes cleaner over time.</p> <p><b>Clause SI3-B 12) Add: Energy master plans should identify a coordinating body to manage</b></p>

	<b><i>the network.</i></b>
<p><b>Clause SI3-D</b>  <i>“Major development proposals within Heat Network Priority Areas should have a communal heating system”</i></p>	<p>The London Plan is pushing towards hybrid solutions to energy provision and infrastructure and which are more complex. There are already challenges with simple CHP systems to manage and maintaining costs at acceptable levels. We have experience of numerous examples of existing CHP systems where people's homes are cold, the communal areas overheat and the costs are unacceptable / unaffordable. It is critical to get the design and the energy provision elements of these systems (and any future hybrid systems) right to avoid; increasing fuel poverty, impacting on health/ life expectancy and the deterioration caused to the fabric of buildings by associated damp / condensation.</p> <p>Alternative demand reduction via fabric first is the priority to address fuel poverty as well as considering alternatives such as heat pumps prior to a district heat network. CHP is currently more carbon intensive and saddling vulnerable poor residents with a heating infrastructure that is more expensive and inflexible to incorporate improved updated systems.</p> <p><b>Clause SI3-D Add: <i>a communal heating system unless they can demonstrates lower energy use and carbon emission by alternative means.</i></b></p>

**Chapter 10 Transport**

<b>Proposed policy</b>	<b>Suggested alteration to policy and explanation</b>
<p><b>Policy T6 Car parking:</b>  <i>Larger residential units will no longer require more car parking than smaller units.                      All developments to provide for electric or ultra-low emission vehicle parking. The Plan further supports hydrogen refuelling or rapid charging infrastructure.                      Parking standards are to be significantly tightened.                      New developments in the most accessible parts of London will be encouraged to be car free only accommodating disabled parking and servicing requirements.</i></p>	<p>Parking levels must continue to relate to PTAL and accessibility of public transport and cycle ways. Car free schemes may be acceptable in Boroughs with sufficient public transport links but elsewhere there needs to be a better template for controlled car use</p> <p>Car-free development as a starting point fails to acknowledge parking spaces are required to sell some schemes. Reducing car parking levels may affect both potential value and viability of new developments in poor PTAL areas, indirectly reducing the number on new homes built regardless of clause T6.1- F stating that the provision of car parking should not be a reason for reducing the level of affordable housing in a proposed development.</p> <p>Car-free and minimum 'car-lite' developments require both disabled and servicing bays provided located close to the relevant block entrance or lift core otherwise problems in both letting and on-going management are highly likely, particularly with the management of parking related to family</p>

size accommodation which is often difficult.

The requirement to reflect this car-free/ car-lite approach in redeveloped estates may be challenging. Our experience of regeneration schemes is that retaining current levels of parking is often a critical issue for existing communities who would be unhappy to lose parking, and hence be far less likely to support a regeneration project.

**Clause T6-I Add: *reflect the current approach where possible. Delete: and not be re-provided at previous levels where this exceeds the standards set out in this policy.***