



# COUNTRYSIDE

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## BY EMAIL & POST

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Dear Mayor,

## DRAFT LONDON PLAN CONSULTATION

## REPRESENTATIONS FROM COUNTRYSIDE PROPERTIES PLC

Countryside Properties Plc have the pleasure of submitting representations on the Draft London Plan (December 2017) to the Mayor for consideration.

Countryside are currently working in partnership with the Mayor of London to create exciting new places that people will love now and in the future, right across the Capital. Some of our flagship developments include Acton Gardens, Ealing; Beam Park, Havering and Barking & Dagenham; Greenwich Millennium Village; Alma Estate Regeneration, Enfield; and Brook Valley Gardens, Barnet. We welcome the Draft London Plan and look forward to working with the Mayor to deliver the Plan in the future. The detailed nature of the Draft Plan is particularly welcome and should help to provide a greater degree of clarity and consistency across the whole of London.

We have focused our comments on the key strategic matters within the Draft London Plan which are of importance to us and these are set out below accordingly. We are also an active member of the Home Builders Federation (HBF) and fully endorse the representations that the HBF have submitted to the Mayor of London on behalf of the housebuilding industry.

### **Good Growth and Encouraging Development**

We welcome the Draft London Plan's objective to pursue 'Good Growth' and 'build a city that works for all Londoners'.



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We particularly welcome the Draft London Plan's acknowledgement that there is a '*housing crisis*'. This can be defined by current annual rates of housing delivery addressing less than half of identified need<sup>1</sup>.

The scale of activity (especially the '*step change*' in housing delivery) sought in response by the Draft London Plan is going to mean much change across London. This may feel unfamiliar to some local communities. It is therefore crucial that the London Plan is clear to London Boroughs and Londoners about why such schemes are coming forward and should be granted planning permission.

To facilitate the required '*step change*', a focus for the London Plan must therefore be encouraging development to come forward, reducing the burdens and barriers to development and encouraging innovation. Simply put, the London Plan must make it more appealing for a landowner/developer in terms of risk/return to pursue development than to 'do nothing' or make less ambitious choices about how to use land.

For the London Plan, this means revisiting draft policy so that it encourages landowners/developers to bring forwards schemes.

To achieve the twin objectives of encouraging development to come forward and then be granted planning permission efficiently we recommend the Draft London Plan addresses the following overarching points:

- 1. The social, economic and environmental consequences of not meeting the housing crisis should be clearly set out in the London Plan** - As set out below and within the HBF representations, the Draft London Plan does not set minimum housing targets sufficient to meet housing need, it is reliant on unreliable sources of supply and current delivery rates do not provide confidence that the housing targets proposed can be achieved.

As the Draft London Plan recognises, there is already a '*housing crisis*'. The Draft London Plan should contain an authoritative explanation for this, not just in terms of its origins but in terms of the implications if it is not addressed. This could be described as a 'Bad Growth' scenario. As it stands, the Draft London Plan fails to explore and explain these consequences.

Whilst it is imperfect in this regard, the '*Draft Housing Strategy*' (September 2017) identifies consequences including '*homelessness and housing need*' and '*economic and social costs*'. A sample passage reads as follows:

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<sup>1</sup> As sets out below, recent years have seen average net delivery of 31,125 homes. The Draft London Plan identifies need for roughly 66,000 homes per annum. Different approaches outlined by the Government and HBF suggest the level of need is higher still.



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*'Public services that support our city are also increasingly suffering as a result of the housing crisis. More than half of London's main 'blue light' (police, fire brigade, and ambulance) emergency services' workers already live outside the capital. Forty per cent of nurses and a similar proportion of young teachers in London say they expect to leave in the next five years because of high housing costs' (paragraph 2.19).*

The Housing Strategy is imperfect because it is not sufficiently forensic about the actual and potential impacts of the housing crisis. The London Plan should refer to evidence that exhaustively addresses the social, economic and environmental effects of there being too few homes but more importantly of households not being able to access accommodation which is appropriate for their needs and for London to be a truly successful city that we are all proud to live and work in.

The explanation about the *'housing crisis'* and its ongoing consequences should be laid out firstly so that it can be readily understood by Londoners and secondly so that it can be straightforwardly cited as guidance for decision-makers.

- 2. The London Plan should provide a presumption in favour of all residential development** – Draft London Plan Policy H2 sets a presumption in favour of the delivery of homes from some (but not all) *'small sites'*. We would like to see this presumption extended to all sites.

Given the scale of London's housing crisis, the Draft London Plan must emphasise that the delivery of new homes should be afforded significant weight when determining planning applications because of the scale of the housing crisis and the potential consequences of not delivering the new homes that London desperately needs.

A presumption is important because it will elevate this matter as a planning consideration for the decision-maker.

- 3. The delivery of *'genuinely affordable'* housing should be afforded significant weight as a material consideration in favour of a planning application** – Given the scale of need for affordable housing, the fact that a planning application will deliver affordable housing (on or off-site or via a commuted payment) should be identified as a significant consideration that weighs in favour of a planning application. Countryside are supportive of the Mayor's target to ensure that 50% of all new homes delivered on public sector land across London are affordable. In other instances, we will work with the Mayor of London and other development partners, such as Registered Providers, to ensure that our developments deliver the maximum viable amount of affordable housing and result in mixed and balanced communities.

A presumption in favour of affordable housing provision is again important because it will elevate this matter as a planning consideration for the decision-maker and



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ensure that developments that deliver genuinely affordable housing are fast tracked through the determination process.

## **Housing Need and Delivery**

### ***Need and Supply***

Paragraph 2.3.3 of the Draft London Plan advises both that:

- *‘the GLA’s new Strategic Housing Market Assessment shows that London has a need for approximately 66,000 additional homes a year’; and*
- *‘the Strategic Housing Land Availability Assessment suggests that London has the capacity for around 65,000 additional homes a year and the housing targets in this Plan reflect this’.*

In terms of the latter, Table 4.1 of the Draft London Plan (which sets out ‘10 year targets for net housing completions (2019/20-2028/29)’), adds up to 64,935 homes per annum. The Draft London Plan does not set a target beyond 2028/29.

It is self-evident that 64,935 homes is less than ‘approximately 66,000’. The Draft London Plan accordingly falls short of addressing identified need.

### **Government Consultation**

Moreover, in September 2017 the Government held a consultation called ‘*Planning for the right homes in the right places*’. This proposed a standardised methodology for measuring housing need. Its methodology identifies London’s need for the period 2016-2026 as 72,400 additional homes per year.

The Mayor of London’s response to this consultation (9 November 2017) included the statement that *‘we note that much of the difference between DCLG’s figure of 72,000 and our own estimate of 66,000 is down to the longer time period used for the latter’*. This statement is hard to substantiate. The Draft London Plan may address the period up to 2041 but it does not set a housing target any further than 2028/29 (the timescale provided in Table 4.1).

The Mayor of London’s ‘2017 London Strategic Housing Market Assessment’ (SHMA) (November 2017) provides more commentary on this point stating that:

*‘The DCLG formula can however be applied to a longer timescale, as DCLG’s 2014-based household projections are available up to 2039. When projected household growth over the full 2016-2039 period of DCLG projections is fed into the formula it produces an annualised figure of 68,455 homes for London, closer to the figure arrived at using the method in this SHMA’ (paragraph 7.25).*



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Whilst this 68,455 homes figure may be closer to the Table 4.1 figure (64,935) this still represents a difference of 3,520 homes per annum or 35,200 homes over a 10 year period. To put this figure into perspective, there are c.35,000 homes in Borehamwood or Billericay.

Draft Policy SD2 (Collaboration in the Wider South East) refers to the need for the Wider South Partners to work collaboratively with 'effective and consistent' technical evidence to address key strategic concerns, such as housing, that affect the Wider South East. However, in practice the Mayor's disregard for the DCLG Standardised methodology will create a disparity within the strategic evidence base, assessment and plan making process required across the Wider South East to fully address the region's housing needs. We therefore consider Draft Policy SD2 to be ineffective.

## ***Home Builders Federation's Analysis***

The HBF uses the Government's analysis as the basis for a different conclusion on housing need. Its representations to the draft London Plan cite a rationale for why the Objectively Assessed Need for London should be the '*uncapped requirement*' of 92,000 homes per annum (rounded for '*the purposes of plan-making*').

## ***Summary of Housing Need***

All in all, taken on face value the Draft London Plan does not identify sufficient supply to meet identified need. The Government's proposed standardised methodology and analysis by the HBF both indicate that need is significantly higher.

## ***Small Sites***

Interrogating the sources of supply cited also emphasises the scale of the challenge.

In particular, the draft London Plan relies on 24,573 homes per annum being brought forward at '*small sites*' (Table 4.2). This represents 38% of the projected total supply. The definition of '*small sites*' includes those measuring 0.25 ha or less and delivering 25 homes or fewer.

However, achieving this delivery rate represents a significant challenge. Table 6.3 of the Mayor of London's '*The London Strategic Housing Land Availability Assessment 2017*' (SHLAA) (November 2017) emphasises that the average number of completions across '*small sites*' has been 10,828 homes per year from 2004/05 to 2015/2016. Moreover, Figure 6.1 of the SHLAA indicates this figure has only exceeded 12,000 homes (i.e. roughly half the target) in 4 of these 12 years.

Draft London Plan paragraph 4.1.3 undersells the challenge with the following: '*To achieve these housing targets [24,573 homes] the overall average rate of housing delivery on both large and small sites will need to approximately double compared to current average completion rates*'.



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Draft London Plan paragraph 4.1.3 continues to state that:

*'The Mayor recognises that development of this scale will require not just an increase in the number of homes approved but also a fundamental transformation in how new homes are delivered. The London Plan, London Housing Strategy and Mayor's Transport Strategy together provide a framework to help achieve this ambition but achieving this step change in delivery will require increased levels of funding to support the delivery of housing and infrastructure, which is discussed in more detail in Chapter 11.'*

It is self-evident that the Draft London Plan's own basis for achieving the 'small sites' target relies on speculative inputs and no incentive for Boroughs to comply. After all, the threshold for referable planning applications to the Mayor of London is 150 dwellings and we therefore think that the GLA need to give more consideration to the 'carrot' and 'stick' that is going to assist with implementation of this policy. This is significant given that so much reliance is placed on the delivery of homes on 'small sites' to achieve the Draft London Plan targets.

## **Summary of Housing Supply**

We see no grounds for confidence in believing that the required 'step change' with respect to 'small sites' will take place to the extent sought in the Draft London Plan.

As set out above, the Draft London Plan relies upon 24,573 homes coming forwards from 'small sites'. It seems far more sensible to assume instead that the delivery rate continues at 10,828 homes per year. In that scenario the Draft London Plan's housing supply falls to 51,190 homes per annum, far short of need, whatever sum is used.

Taking a different approach, the HBF in its representations to the Draft London Plan suggests that overall housing capacity for London is 52,650 homes per year (rounded up to 53,000 homes per year). These figures are similarly far below the capacity identified in the Draft London Plan.

## **Housing Delivery**

The current rate of housing delivery does not achieve the current (and lower) London Plan targets. The Mayor of London's most recent London Annual Monitoring Report 2015/16 (AMR no. 13) (July 2017) reveals the following.

- Table 2.6 identifies the total Number of Net Housing Completions by Borough 2015/16 as 38,533 homes against a target of 42,338 (91%).
  - The above figures includes a net contribution of 32,919 'conventional' homes and 4,564 'non-conventional' homes. Paragraph 3.29 confirms that this 'non-conventional' figure incorporates a net total of 5,259 student



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rooms. The AMR no. 13 counts these non-conventional rooms as homes on a 1:1 basis.

- The Draft London Plan suggests that student rooms should instead be counted on a 3:1 basis. Applying this approach to the figures presented in Table 2.6 would reduce the total Net Housing Completions figure to 35,047 (or 83% against target rather than 91%).
- Table 3.2 Net Housing Supply in London of the AMR no. 13 provides average delivery figures for 12 consecutive years. It identifies an average delivery rate across London of 31,125 additional homes per annum for this period (73% when compared against the current 42,338 home target). For clarity, if the 3:1 methodology described above was retrospectively applied (the figures are not available) then average annual delivery is likely to be even lower.
- In short, the above demonstrates that current delivery rates fall far below current targets. Moreover, current delivery rates across London are roughly **half** of the draft London Plan's 64,935 homes target.
- Focusing on affordable housing, Table 3.13 Affordable Housing Completions as Proportion of Total Net Conventional Supply advises that between 2013/2014 and 2015/2016 the average percentage of affordable homes delivered ranged from 20% to 26%. Table 4.3 of the Draft London Plan reports that 65% of need for homes in London is for affordable homes (47% as low-cost rent and 18% as intermediate). Even without examining the figures on a year-by-year basis delivery self-evidently currently falls far short of meeting need.

The HBF in its representations to the Draft London Plan raises other relevant points. These include the sequence of the plan-making process, which sees a time lag between the London Plan resetting targets and local development plan documents identifying and allocating sites (and a scale of development at these) sufficient to meet the revised minimums. This means it may take time for delivery rates to build up from their current base. This makes it yet more challenging for minimum targets to be met in the shorter term (which in this instance can be described as up to 10 years).

All in all, delivering the minimum number of homes set out in the Draft London Plan requires such a significant overall '*step change*' that it is difficult to see how it can be achieved without substantive changes to the spatial approach set out in the current draft London Plan.

## **Spatial Strategy**

Given the above, and as echoed within the HBF's Consultation response, we do not believe that the Draft London Plan will address London's Housing needs. Whilst measures such as the relaxation of density policy; the encouragement of mixed-use,



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higher density development within 800m of a tube station, rail station or town centre; the redevelopment of unsustainable out-of-town retail parks; the encouragement of smaller sites; and the encouragement to make the most efficient use of all available resources are welcomed, the current policy framework/spatial strategy essentially means that London is 'land locked' because of the green belt policy and the protection proposed to industrial land within draft policies E4 to E7.

The scale of the 'housing crisis' requires the managed release of protected land for new homes. We do not believe the step change in housing delivery required will happen without it. We therefore recommend that the Mayor conducts a housing delivery review to consider additional sources of supply. This review should include:

- the potential release for development for new homes on land in the green belt or Metropolitan Open Land (MOL), particularly in areas where new transport infrastructure is being developed; and
- the release of more land for new homes at appropriate industrial sites, where it can be demonstrated that these proposals are appropriately located and can deliver an appropriate living environment and will not prejudice the long-term functionality of the employment / industrial land.

If the Mayor does not undertake a review of the green belt or MOL, then London boroughs should be encouraged to do this if their evidence/assessments show that this is the only way to address their housing needs.

## **Character and Design**

We support the imperative to optimise the development potential of all land/development opportunities within London. This will however mean development taking place at a scale that may feel unfamiliar to some local communities. The London Plan must be clear about this for the benefit of Londoners and decision-makers.

This involves providing clarity about implications in terms of density and building heights but means that high quality urban design is imperative to creating places we love socially, environmentally and economically. However, explaining the implications of 'Good Growth' means providing clarity about terms used in the Draft London Plan. It is particularly important that the next draft of the London Plan is clear about what is meant by 'character'. The current draft intends different meanings in different sections. This leads to a risk that decision-makers find it harder to justify a resolution to grant planning permission in circumstances where consultees assert harm to a peculiar and subjective definition of 'character'.

It is essential that the meaning of 'character' is addressed for the London Plan to encourage development and help decisions to be made more efficiently. This will almost certainly require the use of different terms across the Plan (e.g. 'physical or historical character' or 'economic, social or cultural character').





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With regards to design, we note that Draft Policy D4, Part E states the following:

*“Residential development should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings”.*

Standard 12 within the Mayor’s Housing SPG (March 2016) advocates a maximum of 8 units per core, however it is conceivable under a policy framework which seeks to eliminate single aspect units entirely that we could end up with inefficient floorplates with 4 units per core. We would recommend that this policy is revised to the current position which seeks to avoid single aspect north facing units and 3 bed single aspect units.

## **Car Parking and Cycle Parking**

We fully support the principle of car free developments within inner city areas, opportunity areas and town centres with a PTAL of 4 to 6 that are well served by public transport infrastructure. We also agree with the sentiments of reducing car ownership in other parts of London but suggest that the ‘maximum’ car parking standards proposed within Draft Policy T6 need to include some flexibility to take account of site specific circumstances where evidence justifies an exceptional case for higher car parking provision.

Again, we support the higher cycle parking standards and the move towards more sustainable forms of travel. However, there may be instances where the competing demands for ground floor space (i.e. commercial uses, energy centres, waste/refuse storage and residential/non-residential active frontages) means it is not possible to accommodate all cycle parking within a highly accessible ground floor or basement location. We therefore welcome the following statement within Draft Policy T5:

*“Where it is not possible to provide adequate cycle parking within residential developments, boroughs must work with developers to propose alternative solutions which meet the objectives of the standards.”*

## **National Planning Policy**

We understand that the Government are due to consult on proposed amendments to the National Planning Policy Framework (NPPF) in spring 2018, with a view to publishing the final version of the NPPF in summer 2018.

The Draft London Plan will need to be reviewed to ensure consistency with the NPPF prior to the Examination in Public on the London Plan which is currently scheduled for autumn 2018. We note that the Draft London Plan states that *‘on some occasions, the Plan deviates from existing national policy and guidance; this is mainly where the Plan is delivering on a specific Mayoral commitment and reflects the particular circumstances of London’* (paragraph 0.0.20).



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If the London Plan is to adopt this approach then it must be explicit where such deviations exist (i.e. not utilising the Government's Standardised Methodology for calculating Objectively Assessed Housing Need) As the Mayor is aware, for the London Plan to be found sound at examination it must be '*consistent with national policy*'.

## **Summary**

We trust that these representations will help the Mayor refine the next draft of the London Plan and we look forward to engaging with the Mayor and his team at City Hall throughout the plan adoption process.

If there is anything that Officers would like to discuss, please do not hesitate to contact us at these offices.

Yours sincerely

  
**Director – Head of Planning**