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## **Greater London Authority New London Plan Consultation Response**

Dear Mayor of London,

I thank you for the opportunity to comment on the Greater London Authority's consultation on the Draft New London Plan and would be pleased if you would accept this letter of response which is made without prejudice, on behalf of the Ministry of Defence (MOD), with specific regard to the issues pertinent to Defence and DIO, our projects in London Greater London and in particular the Reserve Forces and Cadets Associations (RFCA) sites.

### **Background and Context**

In 2016 The Secretary of State for Defence announced the '*Better Defence Estate*' (BDE) which set out our plans to achieve a more efficient, modern and capability focused defence estate across the UK and will be implemented through the Defence Estate Optimisation Programme (DEO Prog).

Project ROSE also part of the DEO prog aims to provide modern fit for purpose facilities for the State Ceremonial and Public Duties units in Central London. The Project concerns units currently at Hyde Park Barracks, Wellington Barracks and Woolwich.

Project Stratton covers 43 Reserve Forces and Cadet Associations (RFCA) sites within London. This review seeks to consolidate RFCA functions into a smaller London footprint, with improved new facilities and to dispose of surplus sites. This represents a significant opportunity to transform the Greater London Reserve Forces Estate which would support the aims of achieving a more efficient, modern and capable defence estate as well as making a significant contribution to the release of land for housing.

### **The Reserves Forces & Cadets Association**

Established in 1908 (as Territorial Associations) the RFCA were originally tasked to provide local support to the Counties, and as such there were several separate Associations. Over 100 years later the name has changed and the RFCA now encompasses reserves and cadets of all 3 military services. The number of associations has reduced to a regional level.

RFCA business is publicly funded, and is a stand-alone entity from the regular-services providing valuable support. The RFCA is currently made up of 13 Associations, one of which is the Greater London RFCA which

operates from 194 locations across London, providing full and part time places of work for 4500 Reservists as well as 16,000 Cadets and volunteers.

The MOD are seeking to consolidate RFCA functions onto a smaller London footprint to improve operational efficiency and to dispose of surplus sites. Where possible, the department will seek to achieve Local Plan allocations, or planning consents for residential uses prior to disposal of surplus sites in order to enable land to contribute towards the Governments Housing Target and in turn the housing aspirations set out in the Draft New Plan for London.

### Estate Optimisation and Re-Provision

As referred to above the proposed rationalisation of the London RFCA estate relies upon the consolidation of RFCA functions onto a smaller London footprint to improve operational efficiency whilst retaining the full suite of reservist operational capability. Therefore, a small number of the identified RFCA sites will be redeveloped to provide all the RFCA requirements on a smaller number of consolidated sites. This will allow cost effective working practices, efficiencies and cost savings through updating the estate, and will allow the site to be used more frequently by the reservists.

The identified sites for re-provision will be enhanced, consolidated Reservist Centres, commonly referred to as 'Super Centres'. It is envisaged that the sites will have full time members of staff, and not be used weekly, but daily. The re-provision site(s) will not just be a place of work or recreation, the proposed consolidated RFCA site(s) will be of great significance in terms of employment, social infrastructure and RFCA operational requirements.

The MOD considers that Reservist Centres across London are of strategic importance and the enhanced Reservist Centres proposed as part of the wider rationalisation programme need to be in the right locations bearing in mind the context of the wider MOD operation strategy and the need to ensure facilities serve areas across Borough boundaries. These sites will provide cross borough benefits and are therefore of strategic importance to Greater London.

The unusual nature of the use of and the requirement to protect RFCA functions and the cross – boundary issues engaged are such that it is suggested a specific policy is required within the New London Plan to recognise the significance of these assets as a distinct sui generis use and support the proposed re-provision programme.

### Release of Surplus Sites

The overall size of the Greater London RFCA estate is over 25Ha, with 13 of these sites considered to be 'pocket sites' (below 0.25Ha). The overarching Public Transport Access Level (PTAL) rating for these sites ranges between 3 and 6b.

Approximately 10 of the sites are in areas which currently benefit from supportive London Plan and Local Plan designations, such as 'Urban Density Zones' and 'Opportunity Areas'.

Given the 'Sui-Generis' land use of many of the sites they do not fall into an employment or community use class which might otherwise be protected or constrained by planning policies and many of the sites are considered to be previously developed land (PDL).

As such the RFCA sites are relatively unconstrained and the rationalisation of the London RFCA estate will result in the release of previously developed land for housing. The proposed rationalisation of the London RFCA estate represents a significant and unique opportunity which, given the combined HUP capacity is likely to be of strategic value to London and as such the MOD consider that this should be recognised in the New London Plan and suggested wording for a policy to reflect these aspirations is included in **Appendix A** for consideration.

### A Review of the New London Plan Policies

Policy GG2 A) states that development of brownfield land, surplus public sector land and sites which are well-connected by existing or planned tube and rail stations, sites within and on the edge of town centres, and small sites will be prioritised.

Policy GG2 B) states that Development must proactively explore the potential to intensify the use of land, including public land, to support additional homes and workspaces, promoting higher density development, particularly on sites that are well-connected by public transport, walking and cycling, applying a design-led approach.

The MOD supports this policy, however, it is expected that due to the mix of activities which has taken place on some of the historic RFCA sites that there will be several costly mitigation procedures which are required prior to development of such sites. It is important that redevelopment of such sites is commercially viable in order to increase the likelihood that redevelopment of the sites will take place and that the anticipated number of housing units together with the other social, environmental and economic benefits which would arise will be delivered.

Policy GG4 B) sets a target of 50 per cent of all new homes to be genuinely affordable.

It is considered that flexibility in this policy will be required in order to ensure maximum delivery of affordable housing for the benefit of the public. In particular where sites have limited capacity for affordable housing full consideration of the off site delivery of affordable housing will be required to allow for a more strategic approach to its delivery.

Policy GG4 D) states that a range of sites including small sites will be identified and allocated to deliver housing locally, supporting skilled precision-manufacturing that can increase the rate of building, and planning for all necessary supporting infrastructure from the outset.

The MOD supports the intent that smaller sites have capacity to not only provide Housing Unit Potential, but also provide a mix of uses. In addition, some of the RFCA sites have potential to be 'gateway' sites which could act as a catalyst for growth. The MOD would welcome GLA engagement on the identification of such sites as a priority for development.

Consistent with policy GG2 A) it is considered that reference to the identification of publically owned surplus sites should be included within policies H1 and H2 suggested amended text for these policies is given in **Appendix B**.

Policy SD1 supports the delivery of opportunity areas by providing support and leadership for the collaborative preparation and implementation of planning frameworks. The MOD supports Policy SD1 with particular reference to the Woolwich Opportunity Area and Thames Estuary Growth Corridor into which Woolwich falls.

MOD announced the closure of Woolwich Station in BDE in November 2016. The site has opportunities for residential led development and the Defence Infrastructure Organisation (DIO) is starting to prepare development options, based on the comprehensive technical work it has undertaken and will be submitting representations, based on this work to the Greenwich Local Plan later this year. DIO is keen to engage with the Royal Borough of Greenwich to develop a strategy for the site and we believe that the site has the capacity to provide some of the 5000 homes and 2,500 jobs allocated for Woolwich in the plan.

Policy H5 sets a strategic target for 50% of all new homes delivered across London to be affordable with a specific target in part 4 of the policy of 50% of housing on public sector land.

MOD supports the delivery of affordable housing, however, as outlined in relation to Policy GG4 B) above and with regard to the increased development costs to which MOD sites are often subject, it is considered that flexibility in this policy will be required in order to ensure maximum delivery of affordable housing for the benefit of the public. In particular where sites have limited capacity for affordable housing full consideration of the off site provision of affordable housing will be required to allow for a more strategic approach to its delivery.

Policy H6 A) sets a threshold for provision of affordable housing at 10 units or 1000sqm floor area and part B) sets the threshold for public sector land at 50% affordable housing provision. The MOD is supportive of the use of public assets to deliver development and outcomes that are most needed by and matter to the public such as to deliver homes to meet the needs of London's essential workers. DIO is particularly keen to engage with the GLA regarding providing homes for servicemen and veterans on its development sites.

It is noted that Parts E) and F) of this policy allow for viability assessments to be submitted in support of applications which will assist in ensuring that development can be brought forward on sites in a commercially viable manner and the MOD would be supportive of wording which includes redevelopment of public sector land especially where this is subject to increased development costs.

## Summary

In summary The MOD in taking forward the intent of the 'Better Defence Estate' via the DEO prog is seeking to transform the defence estate into one which will support the armed forces future needs. In addition to specific sites which were identified in BDE for disposal and re--provision the department is continuing to exam its wider portfolio to find further opportunities to bring forward better new facilities for our troops and to release land which no longer meets the departments requirements which includes the Greater London Reserve Forces Estate.

The MOD asks that the significance of reserve sites as defence assets and their status as a distinct 'sui generis use' to which employment / recreation policies should not be applied is recognised. As outlined above the proposed re-provision programme and release of surplus land is likely to be of strategic importance and it is requested that this is supported in the New London Plan.

The MOD also asks that the unique challenges of redeveloping PDL which has a former military use is recognised to allow commercially viable development to be brought forward on these sites and requests that a flexible approach is taken to the provision of affordable housing including full consideration of off site provision for small or abnormally constrained and challenging sites.

The MOD is fully supportive of policies within the Draft New Plan for London to identify surplus public sector land for redevelopment.

## Next Steps

The MOD looks forward to working with the GLA and other stakeholders on this programme over the coming years and will be seeking to consult the GLA on the emerging new RFCA estate footprint strategy in due course.

Yours Faithfully

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## **Appendix A – is it a possibility that we can get this wording into the Plan?**

### **Reserve Forces and Cadets Association Re - provision - Policy**

The following wording is suggested to be included in a specific policy related to the RFCA estate rationalisation programme;

*'The RFCA Estates Rationalisation Plan identifies major movements across London and involves the consolidation and re-provision of military operational requirements together with the disposal of surplus land. The net impact of these movements is not expected to change the overall size of the military presence across Greater London, but will allow for the re-provision sites to be more effectively and efficiently used. Proposals for the development modern RFCS 'super-centres' will be supported subject to consideration of National and Local Planning Policy. Sites which are no longer required for military use which the MOD wish to dispose of and/or redevelop for non-military uses will be subject to National and Local Planning Policy.*

*Support will be given for:*

- *development which enables the consolidation and improvement of the existing employment, leisure and training areas;*
- *appropriate RFCA military related uses*
- *small scale development to meet local employment, training, leisure and operational needs.*

*The complete loss of RFCA operational requirement will be resisted where suitable alternative locations do not exist. Subject to consideration of National and Local Policy Local Planning Authorities will grant permission for consolidated RFCA 'super-centres' where the redevelopment of underutilised sites is proposed.'*

## **Appendix B**

With specific regard to Housing Supply proposed amendments are highlighted in yellow;

### **Policy H1**

1. boroughs should prepare delivery-focused Development Plans which:
  - a. allocate an appropriate range and number of sites that are suitable for residential and mixed-use development and intensification
  - b. encourage development on other appropriate windfall sites not identified in Development Plans through the Plan period, especially from the sources of supply listed in B2
  - c. enable the delivery of housing capacity identified in Opportunity Areas, working closely with the GLA.

It is proposed that surplus publicly owned land should also be prioritised for redevelopment where housing units can be achieved.

2. boroughs should optimise the potential for housing delivery on all suitable and available brownfield, and publicly owned surplus sites through their Development Plans and planning decisions, especially the following sources of capacity:
  - a. sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m of a Tube station, rail station or town centre boundary
  - b. mixed-use redevelopment of car parks and low-density retail parks
  - c. housing intensification on other appropriate low-density sites in commercial, leisure and infrastructure uses
  - d. the redevelopment of surplus utilities and public sector owned sites
  - e. small housing sites (see Policy H2 Small sites)
  - f. industrial sites that have been identified through the processes set out in Policy E4 Land for industry, logistics and services to support London's economic function, Policy E5 Strategic Industrial Locations (SIL), Policy E6 Locally Significant Industrial Sites and Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function.

- B. Boroughs should proactively use brownfield registers and permission in principle to increase planning certainty for those wishing to build new homes.
- C. Boroughs should publish and annually update housing trajectories based on the targets in Table 4.1 which identify the sources of housing capacity (including windfall) expected to contribute towards achieving housing targets and should work with the Mayor to resolve any anticipated shortfalls.
- D. Where new sustainable transport infrastructure is planned, boroughs should re-evaluate the appropriateness of land use designations and the potential to accommodate higher-density residential and mixed-use development, taking into account future public transport capacity and connectivity levels.

- E. On sites that are allocated for residential and mixed-use development there is a general presumption against single use low-density retail and leisure parks. These developments should be designed to provide a mix of uses including housing on the same site in order to make the best use of land available for development.

## Policy H2

- A. Small sites should play a much greater role in housing delivery and boroughs should pro-actively support well-designed new homes on small sites through both planning decisions and plan-making in order to:

1. significantly increase the contribution of small sites, particularly those sites in public ownership, to meeting London's housing needs
2. diversify the sources, locations, type and mix of housing supply
3. support small and medium-sized housebuilders
4. support those wishing to bring forward custom, self-build and community-led housing.

- B. Boroughs should:

1. recognise in their Development Plans and planning decisions that local character evolves over time and will need to change in appropriate locations to accommodate additional housing provision and increases in residential density through small housing developments
2. prepare area-wide design codes to promote good design and to proactively encourage increased housing provision and higher residential densities on small housing developments. Design codes should provide clear guidelines and parameters for small housing developments and show how additional housing provision can be accommodated in different locations, drawing on the principles set out in this policy and Supplementary Planning Guidance provided by the GLA.

- C. Boroughs should increase planning certainty on small sites by:

1. identifying and allocating appropriate small sites for residential development, particularly those sites in public ownership.
2. listing these sites on their brownfield registers
3. granting permission in principle on specific sites or preparing local development orders.

- D. To deliver the small sites targets in Table 4.2, boroughs should apply a presumption in favour of the following types of small housing development which provide between one and 25 homes:

1. infill development on vacant or underused sites, particularly those sites in public ownership.
2. proposals to increase the density of existing residential homes within PTALs 3-6 or within 800m of a Tube station, rail station or town centre boundary through:
  - a. residential conversions
  - b. residential extensions
  - c. the demolition and redevelopment of existing buildings

d. infill development within the curtilage of a house

3. the redevelopment or upward extension of flats and non-residential buildings to provide additional housing.

E. For the purposes of part D, the presumption in favour of small housing developments means approving small housing developments which are in accordance with a design code developed in accordance with part B. Where there is no such design code, the presumption means approving small housing development unless it can be demonstrated that the development would give rise to an unacceptable level of harm to residential privacy, designated heritage assets, biodiversity or a safeguarded land use that outweighs the benefits of additional housing provision.

F. The presumption in favour of small housing developments should not be applied to:

1. statutory listed buildings
2. developments providing more than 25 homes
3. proposals that do not provide net additional housing
4. sites of more than 0.25 hectares in size
5. non-self contained housing schemes
6. mixed-use proposals within the Central Activities Zone (CAZ)
7. estate regeneration schemes.

G. New build homes on sites capable of accommodating ten units or fewer which are on the ground floor should meet M4(2) standard for 'accessible and adaptable dwellings' and provide step-free access. New build homes on these sized sites that are not on the ground floor do not need to meet M4(2) standards and can comply with the M4(1) standard, which does not require step-free access.

H. Boroughs wishing to apply affordable housing requirements to sites capable of delivering ten units or fewer and which have a maximum combined gross floor space of no more than 1,000 sqm should only require this through a tariff approach to off-site contributions rather than seeking on-site contributions. Boroughs are strongly encouraged to provide the flexibility for payments to be collected prior to the occupation of development, rather than prior to commencement of development.