

Hollybrook comments

Page: [Policy H2 Small sites](#)

Section: [4.2.12](#)

4.2.12 – This section proposes to encourage boroughs to include policies requiring affordable housing provision on sites for 10 units or less. However as stated within the Policy H2, the supporting text should note the second criteria which is a gross development floorspace in excess of 1,000 sqm. The policy should include exceptions in cases where site constraints restricts the proposal to a smaller number of larger units. Especially for conversion projects or constrained where the number of cores, requirement for dual aspects units etc often results in over-sized units. The £ psf decreases for these units and the developer does not therefore benefit and in turn should not be burden by a Affordable Housing Contribution.

Lastly, the policy does however prevent a risk to delivery of small sites as the off-site contribution will be unknown until negotiated with the LPA. This is particularly problematic as there is an unquantifiable financial payment for the developer. If Boroughs are to pursue this policy it should pay high regard to the financial viability of imposing the policy and perhaps a tariff system is set within the policy so that the financial implications are clear from the outset.

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C4 – To be eligible for the fast track route developers must show they have taken account of the strategic 50 per cent target in Policy H5 Delivering affordable housing and have sought grant where required to increase the level of affordable housing beyond 35 per cent. This policy carries a significant danger to speed of delivery if developers are obliged to seek grant to meet the strategic target in order to qualify for the fast track route. This could be lengthy as the funding channels could potentially be inundated with applications. It would be more logical for the GLA to approach schemes with grant to see if they could increase the quantum of affordable with an offer of grant funding. This should however not be a S106 obligation and should be post grant of planning permission.

D – An early stage review is still applicable if an agreed level of progress on implementation is not made within 2 years of PP. The review mechanism makes no allowance for a number of factors, which are out of the developer's control, that could delay the start of the development such as the discharge of the pre-start conditions, market conditions, difficulty in obtaining funding should there be another banking crisis etc. .

There is also the suggestion that the LPA can agree to an alternative length of time until the Early Stage Review is triggered. This is far too onerous if a period of less than two years is considered and the minimum period should be set at two years.

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Section: [4.6.3](#)

4.6.3 – In relation to affordable housing being assessed on a hab room basis under GLA guidelines, many LPA's base affordable housing on a unit basis. The basis for which affordable housing provision is assessed (by Hab room or Unit), should be the same, in order to maintain consistency in the approach to viability or the London Plan should state whether the LPA or GLA policy takes precedence

Affordable Housing provision should not be calculated on habitable floorspace as this is often a result of site characteristics, design alterations imposed by the LPA etc and therefore outside of the developers control.

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Section: [4.6.6](#)

4.6.6 – SIL's/ LSIS etc. should provide 50% affordable housing to be eligible for fast track route due to difference in land values between resi/industrial. There can be significant costs that are more commonly associated with SIL's/ LSIS over other development sites such as contamination, air quality, noise etc. These all have time implications and increase the development risk profile. All of these factors have a significant effect on a developers ability to provide the maximum amount of affordable housing.

SIL/ LSIS areas are more commonly located in areas of lower residential values, the policy does not seem to take this into account. Combined with the fact, that it will likely be located adjacent or near to existing industrial/ employment use restricting values further. Additionally there are several areas in London where SIL's command comparable land values due to the lower residential values and cost of redevelopment. It therefore seems illogical to require a higher benchmark affordable provision in this scenario and there doesn't seem to be any exceptions to this policy where the FT route can still be utilised by a developer.

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Section: [4.6.11](#)

4.6.11 - 5. As we can see in the RICS Guidance on Financial Viability in Planning, Existing Use Value is contrary to RICS guidance which says “Site Value should equate to the market value subject to the following assumption: that the value has regard to development plan policies and all other material planning considerations and disregards that which is contrary to the development plan”. Using the existing use value when undertaking a viability assessment is unrealistic and would not take into account the development potential of the site. Therefore, the EUV Plus Premium must be sufficient enough to encourage the release of land for housing. If not, then there will be no incentive for land to come forward for development and housing supply restricted.

The relevance of AUV should be a recognised option for the benchmark land value especially in mixed use areas, where competing land uses such as offices, retail, hotels etc would compete and in cases outstrip the residential land value. Therefore, viability assessments should factor this alternative method of valuation where a site would have a higher AUV (for an acceptable planning use) than the current EUV plus premium.

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4.6.12 - The current form in which construction costs are calculated during review mechanism is not reflective of what is currently happening in the market. The BCIS is formed from input from government bodies which have different views and goals from private developers. The BCIS figures are produced from a sample of projects, often outdated, do not account for the complexity of differing developments and do not include numerous other construction costs. . Therefore, BCIS figures could be construed as a rudimentary guide but should not be used to form the . This causes the construction cost put forward by the LPA to be unrealistic and unrepresentative of build cost in the current market.

Page: [Policy H7 Affordable housing tenure](#)

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A1 – The policy stipulates that 30% of the Affordable Housing should be at Low Cost Rent, 30% at London Living Rent or Intermediate and the remaining 40% to be decided by the Borough with a preference for Low Cost Rent. However, the rent caps stipulated under the London Plan differ from Local Authority rent caps and affordability criteria. This therefore presents difficulties when valuing the units and the policy should state whether the GLA or LPA Rent Caps apply to the additional 40% to be decided by the Borough. In order to create certainty and maximise the quantum of affordable housing the higher of the two caps should prevail.

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4.7.11 – The additional affordable housing over and above the threshold level must have due regard to financial viability and should be decided by the applicant as they are at no obligation to provide additional affordable units.

Page: [Policy S4 Play and informal recreation](#)

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B2 – There should be exceptions for tight constrained sites particularly in town centres where densities are likely to be higher as this is likely to produce an unrealistic quantum of play space that can be provided. Additionally, the GLA play space calculator places a far more onerous child yield on Low Cost Rent housing which becomes problematic on schemes providing over and above the threshold amount. LPA's should have discretion under the policy to make a judgement on what is an acceptable provision.