

# Jaspar Group comments

Page: [Policy H1 Increasing housing supply](#)

Section: [Table 4.1](#)

These are ambitious targets, which I fully support. A number of local authorities are putting forward reasons why these targets are unachievable and should not apply, this should be met with resistance by the GLA.

Page: [Policy H1 Increasing housing supply](#)

Section: [4.1.5](#)

Fully support. Problems can arise due to the fact LAs are duty bound to achieve best value for the sale of any asset.

Page: [Policy H2 Small sites](#)

Section: [H2](#)

In principle I support this policy, however the NPPF creates a presumption in favour of all sustainable development, consider alternative wording to avoid confusion relating to presumption for larger sites.

Page: [Policy H2 Small sites](#)

Section: [4.2.13](#)

This section needs to acknowledge that LPAs seeking small site contributions should only do so if they are able to demonstrate that small sites remain viable and delivery of these sites will not be prejudiced by applying such a policy. It is recognised in a ministerial statement that applying social housing contributions to small sites creates a disproportionate burden for small developers, any deviation from this position requires evidenced justification.

Page: [Policy H5 Delivering affordable housing](#)

Section: [H5](#)

Please provide evidence that the implementation of this policy will not stifle delivery and render most brown field sites unviable.

It is understood that developers can submit a viability assessment to justify a deviation from the policy, however evidence needs to be provided that quoting that 50% of housing should be affordable won't deter land owners bringing forward land for development. This could perversely lead to further house price inflation to market housing and not lead to any increase in the provision of affordable homes.

I have never in my 18 year career come accross a brown field site in private ownership that has been able to provide over 35% mixed tenure affordable housing.

Page: [Policy H5 Delivering affordable housing](#)

Section: [4.5.1](#)

Again this section does not recognise direction from Central Government detailing that schemes of 10 units or less of 1000m<sup>2</sup> of floor space or less should not be subject to affordable housing contributions. This should be referenced to ensure the plan is sound.

Page: [Policy H5 Delivering affordable housing](#)

Section: [4.5.4](#)

Please explain when in recent years London Boroughs have relaxed social housing policy requirements? In recent years social housing thresholds have fallen, certain Boroughs apply a threshold of one unit, and policy requirements have risen.

Given that I have seen no relaxation in affordable housing policy, I fail to see how a causal link can be formed with rising land value.

I also would like to see evidence supporting the idea that a rise in land value would result in reduced housing delivery.

This whole section should be removed as it makes vague and inaccurate assertions.

Page: [Policy H5 Delivering affordable housing](#)

Section: [4.5.9](#)

Review mechanisms should be upwards and downwards to reflect changing market conditions and ensure schemes remain viable in a falling market.

Page: [Policy H6 Threshold approach to applications](#)

Section: [H6](#)

I support the principle of this policy. I would consider that by setting the threshold at 25% a number of sites would come forward on this basis and delivery would be increased. I think for most brownfield sites 35% is still likely to be unviable.

Review mechanisms should be upward and downward. The market moves both ways.

Page: [Policy H6 Threshold approach to applications](#)

Section: [4.5.2](#)

It needs to be acknowledged that disclosure of commercially sensitive information may be unlawful in certain circumstances.

Page: [Policy H6 Threshold approach to applications](#)

Section: [4.6.4](#)

It should be acknowledged this threshold could decrease. New evidence could come to light and needs can change.

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Section: [4.6.11](#)

This conflicts with RICS guidance, not having regard to the market is dangerous and not reflective of reality.

Page: [Policy HC1 Heritage conservation and growth](#)

Section: [HC1](#)

Consider adding the word “substantial” before harm under point C. I have heard a number of conservation officers state that any development or change to heritage asset or building causes some level of harm. I do not agree with this however this is often the blanket view of many officers in LPAs.