

KG Creative Consultancy comments

K2 Property (jamesthompson@k2property.co.uk)

Page: [Policy G6 Biodiversity and access to nature](#)

Section: [N/A](#)

Part A of the draft policy indicates that protection should be given to sites that are designated as SINC's. However these designations across London are only as good as the evidence base used for such designations. In many instances the evidence base is old, outdated, poor quality and sites are designated on assumptions rather than robust and informed evidence from site inspections. Assumptions are made such as with land adjoining railway corridors that these possess high biodiversity value when in reality they do not.

Part B 1) of the policy refers to the use of relevant procedures to identify SINC's and Green Corridors. The supporting text to this part of the policy refers to the use of the London Environment Strategy to assist in identifying suitable sites, together with Appendix 1 of the Biodiversity Strategy 2002.

However in practice Boroughs have not used best practice to identify suitable sites and have relied on assumptions made at the time of production of their UDP's and because no objection has been raised have simply rolled the designations forward into local plans without re-visiting the designation. This is simply not acceptable in a plan led planning system. Sites are therefore frustrated from being delivered for much needed housing by incorrectly designated sites. The evidence base needs to be robust, site specific and based upon a physical inspection of the site and recording.

Adopting a correct approach will allow for some sites to be released to aid the delivery of housing throughout London.

Page: [Policy G6 Biodiversity and access to nature](#)

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We support clause D of draft policy G6 in that it is important to consider the existence of biodiversity features on a site as part of the initial planning process and scheme design.

We also support clause E of the policy that development of sites can improve the biodiversity of a poor site and lead to positive gains for not only new residents but also the wider neighbourhood. The measures should be seen as positive and beneficial sustainable measures in considering the advantages of developing much needed housing on poorly performing sites.

Goldcrest Land (ben.leek@goldcrestland.com)

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

Section: [N/A](#)

That in draft Policy H1, Part B of the policy this should be amended as suggested in italics below:

2) boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites *including sites within the Green Belt and on MOL*, through....

These designations as we indicate through our submissions on G2 and G3 can contribute to housing supply in London.

In c) this should be amended as suggested in italics below:

housing intensification on other appropriate low-density sites in commercial, *industrial*, leisure....

In respect of Part C this should be amended as suggested in italics below:

Boroughs *must* publish and annually update housing trajectories.....

Requiring Boroughs to publish this information will inform everyone as to their performance in delivering housing

That the draft policy should be amended as shown in italics below:

A 2) diversify the sources, locations, type and mix of housing supply *where appropriate*

C 1) identifying, allocating *and supporting* appropriate small sites for residential development

2) listing these sites on their *comprehensive* brownfield registers

Experience to date of the new registers is that they are not at all comprehensive and were pulled together at the last minute to meet the legislative requirements. At present they are failing to serve their intended purposes.

E delete the text after 'small housing developments' and up to but excluding 'unless it can be demonstrated....'

F delete '5) non self contained housing schemes' from the list

This type of small site development will contribute to meeting housing need in London.

In section A amend the text as indicated in italics below:

The strategic target is for 50 per cent of all new homes delivered across London to be affordable *subject to viability of the scheme*.

This is an important matter that should be set out in the opening section of the draft policy.

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

Section: [H6](#)

In section A insert 'residential' after combined and before floorspace as indicated in italics below:

...delivering more than ten units or which have a combined *residential* floorspace greater than 1,000 sqm....

In section B delete clause 3) that seeks a higher percentage of affordable housing on the designated employment sites, but also the non-designated employment sites. This will frustrate the delivery of housing or at least mixed use development on these sites. These sites in appropriate locations can contribute significantly to both conventional and affordable housing but the challenges of developing these sites cannot be constrained by additional affordable housing requirements.

In respect of section C our experience is that some Councils are still requiring a viability appraisal even when all the criteria in the present SPG are met, that prevents the Fast Track Route being adopted and slows down the delivery process.

In Section D add to the end of the first paragraph add the words in italics:

.....two years of the permission being granted (or a period agreed by the borough) *or the development is a scheme that will be delivered in a single phase.*

In section E 2) a) add the words in italics:

.....two years of the permission being granted (or a period agreed by the borough) *or the development is not a single phase scheme.*

There are a number of examples in London of small/medium sized schemes that will only ever be built out in a single phase. Imposing review mechanisms will make these sites difficult to fund and in itself lead to delays in delivery of housing.

In section F at the end of the sentence add the words in italics below:

....in line with the Mayor's Affordable Housing Viability SPG *or such other methodology as agreed with the Borough or Mayor as appropriate.*

In section H insert the words in italics below:

.....tenure split, *a relevant level of viability information*.....

In section I delete the word 'rigorously' before the words ' assessed under the Viability Tested Route.

This word is unnecessary.

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

Section: [H7](#)

In section A insert the text in italics below:

The Mayor is committed to delievering genuinely affordable housing. *Other then in exceptional circumstances where there would be significant wider implications or it would lead to an oversupply in a specific area of a particular tenure, the following split of affordable products should be applied to development.*

Page: [Policy H9 Vacant building credit](#)

Section: [H9](#)

That the draft policy be amended as shown in italics below:

In Section A

The Vacant Building Credit is *likely* to bring forward additional development in London, [~~delete text~~] so it will be appropriate in London. There are circumstances where the credit would.....

in Section B delete the word 'limited' in the first line and make word 'circumstane(s)' plural.

In Section C amend the references to ' five years' to 'two years' and the refernece to 'at least two' to 'at least one'

These are onus periods of vacancy and active marketing, particulalry in regeneration or intensification areas. Whilst it is agreed that there should be a period of time we consider the shorter periods suggested to be more appropriate.

Page: [Policy H12 Housing size mix](#)

Section: [H12](#)

In section a 9) reword as shown in italics below:

the *important* role of one and two ned units in freeing up fanmily accommodation

Insert new 10) and renumber the remainder points accordingly so as to read:

the important role of single person accommodation in meeting the ability for people to own their own home

Delete in its entirety Section B, given the above suggested insertion.

The contribution that single person accommodation can make to home ownership and allowing small household formation is being ignored in how this policy is phrased.

Page: [Policy H17 Purpose-built student accommodation](#)

Section: [H17](#)

In section A 2) amend as shown in the text in italics below:

2) the use of the accommodation is secured for students *except in University holidays*

This is alluded to in the supporting text at paragraph 4.7.12 where it refers to 'temporary use of accommodtaion' but we suggest it needs to be explicitly included in the policy as well.

In section A 3) amend as shown in the text in italics below:

3) the accommodation is secured for occupation *by planning condition or legal agreement* by members of one or more specified higher education institutions

Delete section 4 in its entirety and renumber the following point. It should be the case that affordable student accommodation will be subject to viability as with conventional housing.

Page: [Policy H17 Purpose-built student accommodation](#)

Section: [4.17.11](#)

The supporting text in paragraph 4.17.11 indicates that where the development is not operated directly by a higher education institution then any affordable student housing 'should be part of the PBSA that is subject to a nominations agreement. This is not agreed as the operator should be able to address this in discussion with the student body and the various higher education institutions the accommodation may be serving.

We therefore object to this paragraph.

Page: [Policy H18 Large-scale purpose-built shared living](#)

Section: [H18](#)

Object -

Delete criteria 8 and its two sub-criteria in its entirety.

In respect of the final paragraph of the draft policy this should amended to read as shown in italics below and added to the list of criteria as 8:

That 35% of the residential units should be rented at a discount of 25% to the current level of market rent.

Page: [Policy G2 London's Green Belt](#)

Section: [N/A](#)

Amend Section B of the policy so as to read:

B The extension of the Green Belt will be supported, where appropriate. In appropriate locations the de-designations of the Green Belt or redevelopment or under utilised brownfield sites will be supported where there is a need to release land to meet objectively assessed housing need

There are locations where the Green Belt boundary fails to meet the purposes of Green Belt as set out in the NPPF, is in sustainable locations and can make a contribution to housing supply and delivery. There are a number of examples just outside London and elsewhere in England where this has shown to be the case. To ignore this and say 'no change' is short-sighted and not in accordance with best practice towards Green Belt boundaries.

Page: [Policy G3 Metropolitan Open Land](#)

Section: [G3](#)

Amend section D as shown in italics so as to read:

D Boroughs should *undertake a robust review of MOL boundaries and should only* designate MOL by establishing that the land meets *more than* one of the following criteria:

Experience is that not all of the presently defined MOL meets the tests in the current adopted plan and some has been released for housing on appeal for this reason. A robust boundary review is needed to keep only that MOL that truly meets the tests and release that which doesn't for housing.