



**HOW**

**Representations to the Draft London Plan  
March 2018**

**HOW Planning LLP on behalf of Lands Improvement Holdings**

**Planning and Environmental Advisers**

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## **APPENDICES**

**APPENDIX 1: SITE LOCATION PLAN**

## 1 EXECUTIVE SUMMARY

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- 1.1 These representations have been prepared on behalf of Lands Improvement Holdings (LIH) in relation to the draft London Plan.
- 1.2 As drafted, the London Plan does not satisfy the soundness requirements in NPPF182 because:
- The draft London Plan is not based on a positive strategy to meet the housing needs of London. The evidence relied upon underestimates London's true Full Objectively Assessed Need (FOAN) for housing. By adopting a benchmark below the true FOAN, the Plan is not justified and will not be effective in achieving the objectives of the NPPF (see Section 4 of these representations).
  - LIH recognise that the Green Belt has value and should be appropriately protected provided development needs can be met. Where this is not the case, it is irrational not to consider other reasonable alternatives to meet London's housing needs. Without undertaking a Green Belt Review it is not possible to conclude that the proposed housing strategy, which fails to plan to meet London's FOAN, is sound (see **Section 3**).
  - Green Belt policy (Policy G2) included in the draft London Plan is not consistent with national policy. The draft wording goes beyond the remit of the NPPF and includes constraints on development that are not justified (see **paragraph 5.9 – 5.12**).
  - The assumptions included in the 2017 London SHLAA are not realistic. The reliance on small sites has not been justified and the density of development that is likely to be achievable overstated, particularly in Outer London (see **paragraph 4.12 – 4.23**).
  - To realistically achieve higher levels of affordable housing the London Plan must look for new solutions beyond brownfield sites, which have failed to deliver in the past (see **paragraph 4.33 – 4.35**).
  - The new London Plan should include a review policy that includes measures to quickly remedy any shortfall against housing targets to avoid a continuation of the current poor performance of housing delivery in London. This should include safeguarded sites identified through the London Plan or Local Plans that could come forward quickly to make up any shortfall (see **Section 6**).
- 1.3 To make the London Plan sound, the flaws identified in these representations should be remedied through the next stages of plan preparation. Further supporting evidence should be prepared on:
- London's true FOAN;
  - The up-to-date role of London's Green Belt; and
  - Analysis of alternative options with the benefit of this essential evidence base.
- 1.4 The above information would allow a realistic review of the deliverability of the Plan's housing strategy and an assessment of the consequences for affordable housing delivery to ensure that the London Plan can be put forward as the most appropriate strategy in terms of overall sustainability. Without this analysis it is not possible to properly conclude the London Plan is justified, likely to be effective, positively prepared or consistent with NPPF policy.
- 1.5 LIH are also separately involved in a developer consortium, represented by Barton Willmore, who are submitting representations on the London Plan's relationship with the wider South East.

## 2 MAJOR OUTER LONDON HOUSING OPPORTUNITY

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- 2.1 Lands Improvement Holdings (LIH) specialise in the purchase, promotion and delivery of large-scale development projects throughout the UK. Projects include the development of brownfield regeneration and sustainable greenfield sites. LIH's focus is on community led, sustainable development that delivers well-designed and well-connected communities that are pleasant and vibrant places to live and work and are valued by both new and existing residents.
- 2.2 LIH own a sustainable development opportunity site to the east of St Mary Cray in LB Bromley. The site adjoins the urban area and is near existing jobs, schools and shops. See **Appendix 1** for a Site Location Plan.
- 2.3 The site could deliver in the region of 1,000 – 1,200 family homes, including a significant proportion of affordable housing. The potential contribution of the site to meeting London's housing needs has not been considered as part of the draft London Plan.
- 2.4 The site is bound on three sides by existing development and no longer serves the purposes of Green Belt as set out in the NPPF. The eastern edge of the site could form a natural future boundary to the Green Belt with enhanced public access.
- 2.5 The site is of low environmental and agricultural value and is not being put to best use given the significant need for housing in London and the significant undersupply of housing sites.
- 2.6 As well as housing, the site has the potential to accommodate a new school / other community facilities and contribute towards transport improvements to public transport and local highways.
- 2.7 The site is in the Cray Valley Renewal Area and close to the Cray Business Corridor. Development on the site would support the growth and regeneration of these strategically important areas.
- 2.8 The site would be a catalyst for regeneration in St Mary Cray to improve local facilities, support create jobs and deliver much needed new family homes.
- 2.9 LIH also owns a number of sites in the wider South East and is separately submitting representations as part of a developer consortium on the implications of London's unmet need on the wider South East region. This consortium is represented by Barton Willmore.

**3 CHAPTER 1 - PLANNING LONDON’S FUTURE**

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**Policy GG2 - Making the best use of land**

- 3.1 Policy GG2 is too restrictive to meet the needs of Londoners and should be expanded to include further options for making the best use of land.
- 3.2 This should include a review of the Green Belt to identify land adjoining existing urban areas that does not make a positive contribution to the Green Belt or nearby communities. Where such sites are well-connected by existing or planned public transport, opportunities to make better use of these limited areas of Green Belt should be explored.
- 3.3 Without a Green Belt review, or provisions in place to review Green Belt boundaries through subsequent borough level Local Plans, it is not possible to conclude that the proposed London Plan is sound and NPPF compliant. Planning to not meet London’s housing needs, without first considering the potential role of the Green Belt is irrational. The draft London Plan does not represent justified and positive planning to identify the most appropriate strategy for meeting London’s housing needs having regard to the overall sustainability balancing act.
- 3.4 The Green Belt makes up over one fifth (22%) of all land in London that is potentially available to help meet housing needs. Ruling out the Green Belt at the outset (now or through subsequent borough Local Plans) prejudices the whole plan making process, especially when development needs are not proposed to be met (including market and affordable housing). It discounts other reasonable alternatives and implies that every acre of the Green Belt, drawn up over 80 years ago, is sacrosanct and cannot be sustainably developed (alongside other sources of land) to help house Londoners.
- 3.5 Across London there are examples of Green Belt land that adjoins existing development and does not serve the NPPF purposes, is of low environmental and agricultural value (such as LIH’s site in St Mary Cray). This land could be put to better use for housing and other uses that integrate with existing communities and transport networks. This could be done without undermining the integrity of the wider Metropolitan Green Belt.
- 3.6 The benefits of allowing a wider range of options for making the best use of land, including Green Belt land, are:

**1. Greater investment in community facilities.**

In the same way as high-density brownfield development, sustainable strategic urban extensions provide a critical mass of people to support the investment required to build the schools, health services and public transport infrastructure neighbourhoods need to work. The added benefit of sustainable strategic urban extensions is they usually have lower development costs than previously developed land, which mean that there is scope to reasonably delivery more public benefits, alongside affordable housing.

**2. A more balanced distribution of new housing and investment across the whole of London.**

Brownfield land and Green Belt is not evenly distributed across London. For example, LB Bromley has 52% Green Belt coverage, compared to 27% in neighbouring LB Croydon.

A housing strategy that is solely focused on brownfield sites, will result in the uneven delivery of housing and mean that outer London Boroughs, like LB Bromley where there are less opportunities for intensification on brownfield land, will not be able to meet their housing needs.





- 3.11 In 2015/16 there were 6,675 affordable homes built (17% of all new homes built) against a 50% target of 21,195 affordable homes (London AMR 2015/16). That is a shortfall of over 14,500 affordable homes in a single year.
- 3.12 This is not unsurprising or unreasonable as these brownfield sites deliver other transformational benefits (eg transport infrastructure, bringing contaminated land back into use, jobs, schools etc) which cost money and require a pragmatic approach to affordable housing to ensure schemes are viable and come forward.
- 3.13 To offset the lower levels of affordable housing commonly achieved on brownfield sites and deliver the level of affordable homes Londoners need, which is the purpose of Policy GG4, a broader range of sites should be identified. This should include strategic urban extensions in the Green Belt where they are not environmentally valuable, well-connected to existing communities by existing or planned public transport and could deliver a significant proportion of affordable housing.

***Change sought to Policy GG4***

- 3.14 The wording of Policy GG4 should be amended as follows (or words to the effect of):

“... ”

*E. D. Identify and allocate a range of sites, including small sites and, where appropriate, larger strategic allocations, 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.*

...”

**4 CHAPTER 4 - HOUSING**

**Policy H1 Increasing housing supply**

- 4.1 The London Plan as submitted will fail to meet London’s objectively assessed housing need for two main reasons:
- the under-estimation of Full Objectively Assessed Need (FOAN);
  - the unrealistic assumptions about the availability and capacity of brownfield sites, particularly in Outer London boroughs.

2017 London SHMA

- 4.2 The housing need evidence used to support the London Plan does not meet the requirements of the NPPF or PPG. As a result, the true scale of London’s housing needs has not been properly identified.
- 4.3 The identified need of 65,787dpa set out in Table 13 of the SHMA excludes the “housing requirements of particular groups” identified in Chapter 8 of the SHMA, including:
- 870 'C2' care home beds a year (equal to 870dpa);
  - 3,500 PBSA bed spaces a year (equal to 1,667dpa).
- 4.4 Allowing for the above additional requirements the identified need increases to 68,324dpa. This equates to 25,370 extra dwellings over the plan period, which currently have not been accounted for.

2017 London SHLAA

- 4.5 The housing target including the draft London Plan is a supply constrained figure based on the London SHLAA. It is based on an assessment of available large sites and an estimate of small sites.

**Table 1: Breakdown of large sites and small sites in London and LB Bromley**

	Large Sites target	Small Sites target	Total 10-year target
London	400,470 (62% of total supply)	245,730 (38%)	649,350 (100%)
LB Bromley	3,922 (28%)	10,290 (72%)	14,240 (100%)

- 4.6 Across London as a whole, 62% of new homes are expected to come forward on identified large sites. Less than 40% are predicted to come forward on small sites.
- 4.7 In LB Bromley the balance is very different, with 38% of new homes expected to come forward on identified large sites and over 70% predicted to come forward on unidentified small sites.
- 4.8 This represents a significant imbalance in LB Bromley compared to the rest of London, particularly in an authority which has a limited brownfield capacity. Even a minor under delivery would mean that over 75% (11,000 dwellings) of LB Bromley’s supply would have to be found on small, as yet unidentified, brownfield sites in a heavily constrained Green Belt authority with knock on effects





for affordable housing delivery. We consider such an approach unrealistic and does not represent positive, justified or effective planning in accordance with NPPF182.

- 4.9 Through the Bromley Local Plan examination LIH in December 2017, and others, set out in detail the long-standing deliverability issues associated with LB Bromley's housing trajectory. The scale and timeframes for development in Bromley Town Centre are not realistic. Many of the sites relied on by LB Bromley have been allocated since 2010 and have failed to deliver any housing. Despite there still being unresolved issues, first identified by the Bromley Town Centre AAP Inspector in 2010, LB Bromley is seeking to increase the overall delivery on these uncertain sites by over 25%.
- 4.10 To ensure an adequate supply of housing in London, additional deliverable sites, possibly including strategic urban extensions, should be identified to allow sufficient flexibility to accommodate unexpected delays to the sites identified already identified. This is particularly important in the boroughs, like LB Bromley, where there are unresolved deliverability issues.

### **Policy H2 Small Sites**

- 4.11 The scale of housing to be delivered from small sites has not been justified on a borough level. Based on historic trends and availability of new sites it is unrealistic to expect development on small sites to deliver new housing on the scale required, or indeed envisaged (38% of total supply), by the draft London Plan.
- 4.12 The small site target included in the draft London Plan is proposed to be significantly increased. The new higher target is based on past trends of unidentified small sites coming forward and estimates for these sites to accommodate more housing through intensification. These are two heroic assumptions, with a large margin for error.
- 4.13 The small sites that have come forward in the past are those that were easiest to develop. Finding more small sites in the future will become harder. It is dangerous to assume that the trend for small sites will increase or even continue at the same rate. Making assumptions that unidentified small sites can achieve higher densities of development, without understanding site context, surroundings and indicative scheme designs is also dangerous.
- 4.14 If you take LB Bromley as an example:
- Between 2008 – 2016, LB Bromley delivered 1,980 units on small sites, equating to 220 units per year. The new London Plan target expects LB of Bromley to deliver 1,029 units per year on small sites, representing a 467% increase on past trends.
  - LB Bromley recently submitted its draft Allocations Plan (2017), including a housing trajectory<sup>1</sup> informed by a thorough review of all reasonable alternatives for new housing sites within the existing urban area of the borough.
  - LB Bromley concluded that there were only enough deliverable or developable sites to meet half of its current London Plan minimum target of 641 dpa.
  - As a result, LB Bromley is heavily reliant on small windfall sites (48% of supply) to meet future housing needs. This is not an approach encouraged by the NPPF as it is highly uncertain and does not represent positive planning.

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<sup>1</sup> LIH, and others, have challenged the robustness of the Council's evidence and the deliverability of the housing trajectory as part of the Bromley Local Plan examination. The Inspector's report is pending.

- The reason LB Bromley has not been able to identify more deliverable or developable sites is because it is constrained by Green Belt. This is not a situation that will change significantly, unless Green Belt boundaries are amended.
- In the draft London Plan, LB Bromley’s minimum housing target is proposed to increase from **641dpa to 1,424dpa (a 122% increase)**. LB Bromley has not reached this level of housing delivery before. The current eight-year trend is 579dpa.
- This means that when the London Plan is adopted in 2019, LB Bromley will need to find sites to accommodate an additional **9,396 dwellings** (1,424dpa – 641dpa = 783dpa x 12 years remaining of LB Bromley Plan). The impact of this increase, likely to take place in the next two years, has not been considered by LB Bromley’s in its draft Local Plan.
- LB Bromley has already increased densities on proposed allocated sites in its draft Local Plan, including recycled allocations from the 2010 Bromley Town Centre Area Action Plan that have that have not come forward due to unresolved ownership, heritage and amenity issues.
- Having identified all available housing sites, including a very significant windfall / small site allowance and already increased densities on allocated sites, it has not been justified how LB Bromley can expect to meet its higher housing target solely through increasing densities further on small sites.
- If this were to happen, **72% of LB Bromley’s purported housing supply would need to come from small sites and windfalls**. This approach has not been justified through historic evidence and we do not consider to be positive planning in accordance with the NPPF.
- Without recognition in the London Plan that the city region needs space to grow, by limited alterations to Green Belt boundaries, borough’s like LB Bromley are set up to fail to meet their housing needs.

4.15 Policy H2 also raises conflicts with a number of other London Plan policies:

Affordable housing

4.16 In LB Bromley, the draft London Plan predicts that 72% of housing in the next ten years will come through small sites (London Plan table 4.2). Small sites are largely exempt from the need to deliver affordable housing and are less able to make other planning obligation contributions. This proposed approach will have a devastating impact on affordable housing delivery in LB Bromley, which has only managed to delivery 20 net new affordable homes in the last four years.

**Table 2: Affordable deliver in LB Bromley 20012/13 - 2015/16**

Year	Target	Net number of dwellings	Inc. net number of affordable dwellings	% Affordable Housing	Source
2012 - 2013	500	627	-68	0%	AMR 2014- 2016
2013 -2014	500	605	140	23%	AMR 2014- 2016 and *AMR 2013- 2014
2014 - 2015	500	417	-62	-0%	AMR 2014- 2016

2015 - 2016	641	717	10	1.4%	AMR 2014- 2016
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Pressure on community assets

4.17 The pressure to build on more small sites will likely lead to the loss of existing community assets and urban open spaces that should be protected and prioritised over developing limited areas of Green Belt that is of low environmental quality.

Conflict with conservation and residential amenity policies

4.18 There are many different factors that dictate what is achievable on a site, including competing uses (residential / employment / open space), amenity constraints, conservation constraints and tensions with local community aspirations. It is not possible to justifiably apply blanket intensification on small sites, without consideration of these specific local constraints.

4.19 This is a particularly relevant issue in LB Bromley, where the authority has a history of refusing housing schemes on amenity / overdevelopment grounds, including on allocated sites. In the last year alone, three major housing schemes for 367 dwellings (in total) were refused due to overdevelopment.

4.20 In addition to the refused applications, Site B Tweedy Road in the Bromley Local Plan was allocated for 70 dwellings in 2010. An appeal for 72 dwellings was dismissed in 2009 and subsequently the Council’s site capacity estimate has been revised down to 24 dwellings in the latest submitted Local Plan based on site specific design considerations not available at the time the site was allocated for 70 dwellings.

4.21 Without analysis of site context, surroundings and an indicative scheme design it should not be assumed that development densities can be significantly increased in LB Bromley or elsewhere in London (particularly Outer London) as a means to meeting London’s housing shortfall.

**Change sought to Policy H2**

4.22 To ensure that the London Plan is positively prepared and able to meet its housing needs, the small sites targets included in Table 4.2 should be reviewed and other reasonable alternatives identified, including the Green Belt, to supplement supply from small sites.

**Policy H3 Monitoring Housing Targets**

4.23 The housing crisis in London is the result of the failure of past plans to deliver the housing needed. It is critical that the new London Plan does not repeat past mistakes and includes a monitoring and **review policy** that has the means to quickly remedy any emerging shortfall against targets.

4.24 Allowing demand to continue to outstrip supply will mean that affordability of housing in London will continue to worsen. The harm will be felt most by lower and middle-income groups and young people, who the London SMHA confirms are already most affected by the housing shortage, and will either have to leave London or live in overcrowded and substandard housing.

4.25 Constraints on housing supply will also place limits on the number of working age migrants who can move to London, undermining the overall employment growth strategy.

4.26 Not building enough new homes also impacts the ability to fund new infrastructure projects through s106 and CIL contributions.

4.27 Checks and balances should be included in the new London Plan so that the trend of poor performance is not able to continue without recourse. Policy H3 should be amended to include measures to make up for shortfalls in housing delivery measured over a two-year period. This



should include safeguarded sites identified through the London Plan or borough Local Plans that could come forward quickly to make up any shortfall.

Monitoring for housing requirements for particular groups

- 4.28 Accommodation for students and older people (Class C2) should not count towards meeting London Plan housing targets as they have been discounted from the overall requirement.
- 4.29 If accommodation for students and older people (Class C2) is to be counted towards housing delivery, then the housing requirement and minimum housing target should be increased accordingly to avoid double counting in accordance with PPG (Paragraph: 038 Reference ID: 3-038-20140306).

**Change sought to Policy H3**

- 4.30 Policy H3 should be amended as follows (or words to the effect of):

*“Policy H3 Monitoring and managing housing delivery targets*

...

*C. Not non-self-contained accommodation for students and shared living schemes should count towards meeting housing targets on the basis of a 3:1 ratio, with three bedrooms being counted as a single home.*

*D. Not non-self-contained accommodation for older people (C2 use class) should count towards meeting housing targets on the basis of a 1:1 ratio, with each bedroom being counted as a single home.*

*C. Borough Local Plans must ensure that housing targets set out in Table 4.1 are effectively planned for and will be required to undertake an immediate Local Plan review to boost housing supply if any of the following happen:*

*(i) If net housing completions fall below the London Plan minimum housing target for the relevant year by more than 20% for two consecutive years (or by average across two consecutive years); and*

*(ii) If net affordable housing completions fall below the London Plan affordable housing threshold of 35% by more than 20% for two consecutive years (or by average across two consecutive years).”*

**Policy H5 Delivering Affordable Housing**

- 4.31 The draft London Plan should include new measures that will significantly boost affordable housing delivery. As drafted Policy H5 largely reflects the status quo which has failed to deliver.
- 4.32 The adopted London Plan set a target of 17,000 additional affordable homes per year. The need for affordable house was assessed in 2013 to be 25,600 per year. Therefore, the proposed target was already below the assessed need. Combined net affordable homes delivered in 2012/13 to 2014/15 was 22,426 units, an average of 7,475 per year. In 2015/16, only 6,675 affordable units were delivered. Therefore, there has been consistent under delivery of affordable units which places greater importance on meeting the undersupply and future demand.
- 4.33 Securing more affordable housing on strategic urban extensions released from the Green Belt and will boost significantly the supply of affordable housing in London.

## 5 CHAPTER 8 - GREEN BELT

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### Policy G2 London's Green Belt

- 5.1 Policy G2 is not consistent with national policy. The draft wording of the policy goes beyond the remit of the NPPF and includes constraints on development that are not justified. Policy G2 should be amended accordingly to reflect the NPPF.
- 5.2 The NPPF affords Green Belt the highest level of protection but recognises that in exceptional circumstances boundaries may need to be altered (NPPF83) and in very special circumstances development that might otherwise be considered inappropriate can be approved in the Green Belt (NPPF88). These fundamental principles of Green Belt policy, enshrined by the NPPF, should be reflected in the London Plan.
- 5.3 The NPPF expressly allows for green belt boundaries to be altered in exceptional circumstances through the preparation of new Local Plans. Whilst preparing a new local plan is not, of itself, an exceptional circumstance justifying alteration to a green belt boundary, the ability to make this planning judgement through the Local Plan process should not be fettered by the London Plan. Nor should the London Plan limit the discretion of London boroughs to find innovative solutions to meet and exceed their individual housing needs by placing a blanket ban on the Green Belt, which is not justified or consistent with national policy.
- 5.4 The NPPF requires the plan-making authority to understand the extent to which NPPF policies (including those in footnote 9) constrain meeting FOAN. That requires an exercise of planning judgment, as directed by NPPF83, of whether there are Exceptional Circumstances for the alteration of GB boundaries to both ensure their durability beyond the plan-period and understand the overall planning balance in respect of sustainable growth (to which NPPF14 and 182 are directed). A positive approach to evaluation of all reasonable alternatives based on proportionate evidence is therefore required.
- 5.5 NPPF83 requires an understanding of the relative merits of changes to the Green Belt so that a properly balanced judgment can be taken about the balance of benefits from different approaches. By doing so, the preferred strategy can emerge (and be seen to be) the "most appropriate" of all reasonable alternatives (NPPF182).
- 5.6 The draft London Plan is based on a constrained FOAN, therefore the extent of the shortfall is a matter of planning judgement. That judgement must, however, be 'justified' (in the sense of being the product of an evidence-based consideration of the relative merits of reasonable alternatives). The GLA must have put itself in a position to be able to rationally undertake it by:
- Having assembled the evidence to be able to understand relative merits (i.e. both the parameters and effects of different alternatives and the underlying condition of the affected assets themselves, including the status of existing Green Belt land);
  - Being prepared to then undertake a transparent exercise of considering the range of reasonable options and their relative costs and benefits.
- 5.7 Neither is the case in relation to the London Plan which is the product of improperly treating the Green Belt as a fixed constraint with no reference to the planning judgment of the relative benefits in terms of all facets of sustainability (including social and economic as well as environmental) of limited Green Belt release. The draft London Plan has failed to properly give effect to NPPF83, and the wider NPPF policies referred to above, which requires to see the "whole picture" on sustainability when making a planning choice about the constrained approach.
- 5.8 Given that the draft London Plan acknowledges that it will fail to deliver the homes needed over the next 10 years, alternative strategies should have been assessed. Including a review of the

Green Belt, which identifies and weighs the social, economic and environmental costs and benefits of different options to understand the 'most appropriate' balance of sustainability between those interrelated elements. Without properly considering alternatives it is not possible to conclude that the submitted plan represents the most appropriate strategy in accordance with NPPF182.

#### Green Belt Review

- 5.9 The Green Belt was drawn up over 80 years ago. It does not reflect the needs and the opportunities of the present or the future. The quality of its contribution to the five purposes of Green Belt has changed. The importance of that contribution, relative to today and tomorrow's pressures of housing stress (and its social and economic consequences) have changed.
- 5.10 Nothing has been done to understand the strategic value of the existing Green Belt to London and weigh its contribution against the opportunity costs of doing nothing. That is not positive planning for the most appropriate way to deliver sustainable growth.
- 5.11 LIH's site for example, is bordered on three sides by existing development; plays no role in preventing neighbouring towns from merging; has no historic significance; and is in an area where available brownfield land is already in such scarcity that the housing needs of communities in identified need of regeneration go unmet. The analysis behind the London Plan has not taken these exceptional circumstances into account as allowed for at NPPF83.

#### ***Change sought to Policy G2***

- 5.12 For Policy G2 to be in accordance with the NPPF the policy should be amended (or words to the effect) as follows:

*"A. The Green Belt should be protected from inappropriate development in accordance with national planning policy.*

*i) ~~development proposals that would harm the Green Belt should be refused~~*

*B. ~~Opportunities to #) the enhancement of the Green Belt to provide appropriate multi-functional uses for Londoners should be supported.~~*

*C. ~~where appropriate, opportunities should be considered to make better use of Green Belt land that is not environmentally valuable, adjoins existing urban development and is well connected by existing or planned public transport.~~*

*B. ~~D. The extension of the Green Belt will be supported, where appropriate. Its de-designation will not.~~*

## 6 CHAPTER 12 - MONITORING

### Policy M1 Monitoring

- 6.1 Chapter 12 and Policy M1 deal with monitoring only and should be expanded to include delivery, management and implementation policies to ensure that the London Plan is effective.
- 6.2 As drafted, the KPIs included in Table 12.1 are not specific, measurable, assignable, realistic and time-related (SMART), meaning it will not be possible to objectively measure the performance of the London Plan over the plan period in critical areas like housing delivery. This is a key failing of the draft plan.
- 6.3 Policy M1 should be amended to include SMART KPIs, as well as new measures for taking action if there is a record of under delivery in any individual KPIs.
- 6.4 As set out in section four of these representations, the housing affordability crisis in London is the result of the failure of past plans to deliver the housing needed. The new London Plan should avoid past mistakes by including a review clause for boroughs to quickly remedy any emerging shortfall against minimum housing targets.

### Change sought to Policy M1

- 6.5 For Policy M1 to be in accordance with the NPPF, the policy should be amended as follows (or words to the effect):

*“Policy M1 Monitoring, delivery, management and implementation”*

*The implementation of the London Plan will be kept under review using, in particular, the Key Performance Indicators set out in Table 12.1 and reported in the Annual Monitoring Report.*

*To ensure that the London Plan is effective, if performance falls below an individual KPI, in accordance with the criteria set out in Table 12.1, alternative measures will be implemented immediately to ensure that performance is improved to meet individual KPIs and the overall objectives of the London Plan.”*

- 6.6 Table 12.1 should be amended (or words to the effect) as follows:

<b>Housing</b>	
KPI	Supply of new homes
Measure	<i>Ensure that there is a supply of homes to meet and exceed the minimum housing targets set out in Table 4.1 and in accordance with Policy H3. [as amended as part of these representations]</i>  <del><i>Increase the supply of new homes over the period (monitored against housing completions and the net pipeline of approved homes), towards meeting the 66,000 net additional homes needed each year up to 2030.</i></del>
KPI	Supply of affordable homes



Measure	<p><u>Ensure that at least 35% of all new homes are affordable in accordance with Policy H3. [as amended part of these representations]</u></p> <p><del>Positive trend in percentage of planning approvals for housing that are affordable housing (based on a rolling average).</del></p>
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<b>Environment</b>	
KPI	Protection of Green Belt and Metropolitan Open Land
Measure	<p><del>Inappropriate development in <u>Harm to the Green Belt and Metropolitan Open Land should not be approved, except in very special circumstances in accordance with national policy.</u> prevented through the referred application process.</del></p>

6.7 Consequential and similar amendments should be made to the other KPIs included in Table 12.1 and not referred to above.



## 7 INTEGRATED IMPACT ASSESSMENT

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- 7.1 Whilst it is recognised that the Integrated Impact Assessment (IIA) is an ambitious document, in places it should be made clearer and its scope extended. Without doing this further work, it is not possible to conclude that the draft London Plan is based on a justified evidence base that represents the most appropriate strategy, considered against reasonable alternatives in accordance with NPPF182.
- 7.2 In addition, some of the recommendations included in the IIA have been ignored and should have been reflected in draft policies in the London Plan (see below).

### Strategic options

- 7.3 The IIA is not supported by a Green Belt Review. As a result, the reported conclusions on the relative value of the Green Belt are not justified.
- 7.4 Without a comprehensive Green Belt Review (or the option for one through future Local Plans) the IIA adopts too narrow an approach to the opportunity for and benefits of limited Green Belt release in London. Proper consideration of limited Green Belt release as a reasonable alternative should be included in the IIA. Particularly where boundaries have not been reviewed for over 80 years and it is proposed to not meet FOAN for housing.

### Policy GG2 (page 43)

- 7.5 IIA Option 4 for Policy GG2 considers “selective” Green Belt release, without defining what selective means or identifying proposed locations.

- 7.6 Even so the IIA states:

*“This [Selective Green Belt Release] would bring a range of local economic benefits, helping to meet local demands and contribute to service and infrastructure provision. The release of land around commuter hubs could help to maximise and enhance strategic public transport infrastructure, underpinning sustainable growth. Green belt release in sustainable locations and areas of high PTAL could encourage inclusive growth, allowing access to the wide range of opportunities London has to offer. Increased public transport would contribute to improvements in air quality by reducing private vehicle use and associated emissions. Similarly, associated traffic noise would also decline and good design can help to ensure the number of people exposed to high levels of noise is in decline. This option also promotes the delivery of employment and housing land which will benefit businesses and residents alike, and could play a role in strengthening the long term competitiveness of London” (Page49).*

- 7.7 Despite the benefits identified above, Option 4 was discounted on environmental grounds. The decision to discount Option 4 was made without reference to any specific sites, a Green Belt Review or Ecological Assessment. Much of the Green Belt surrounding London has been intensely farmed, with low ecological value. New development of intensely farmed sites can deliver biodiversity gains, through creating new habitats. This is the case on all LIH’s sites.

- 7.8 The IIA goes on to state that the release of Green Belt land was also discounted on the basis that:

*“This [Green Belt] land often supports a range of social activities, including community events, sports and leisure uses and other schemes that support health and wellbeing. Although the release of green belt will prioritise low performing areas, this may have some adverse impacts on local communities, heritage assets and associated leisure opportunities. Releasing greenbelt land could also have negative impacts on flooding as it would increase the amount of non-permeable, tarmac ground and reduce soils and trees to intercept water. Similarly, air quality*

*would also be negatively impacted by reducing the amount of green space and trees available to act as a carbon sink for emissions” (Page 49).*

- 7.9 In the absence of a Green Belt Review, the consideration of specific sites and other supporting evidence, it is not possible to arrive at the conclusions that all Green Belt release will have negative environmental impacts, result in the loss of social and leisure opportunities, have negative heritage impacts, result in increase in flooding and have adverse air quality impacts.

Policy GG4 (page 61)

- 7.10 The consideration for Policy GG4, delivering the homes Londoners need, does not consider the opportunity for and benefits of providing affordable housing through limited Green Belt release.

**Housing**

Policy H1 (page 137)

- 7.11 The IIA recommendation states that the Policy H1 should provide further reference to delivering housing to meet a range of needs including affordable. The GLA response states that these issues are covered within policy H5, however this is not the case.
- 7.12 We support the IIA recommendation and it is recommended that Policy H1 is amended to include further references to affordable housing delivery (as outlined in earlier these representations).

Policy H3 (page 141)

- 7.13 Policy H3 seeks to ensure LPAs assess housing delivery against policy targets. The IIA appraisal recommends a more comprehensive monitoring and review process of housing delivery against London-wide targets which we support. However, this was not included in the draft policy.
- 7.14 A more comprehensive monitoring and review process should be incorporated within Policy H3 as per the IIA recommendation and as set out earlier in these representations.

**Green Belt**

Policy G2 (page 225)

- 7.15 The IIA fails to recognise the inherent conflict between Policy G2 and other policies in the London Plan; for example, not meeting London’s full housing needs (Policy H1).
- 7.16 In the absence of a Green Belt Review, Policy G2 is not supported by evidence and is therefore not justified.
- 7.17 The IIA appraisal of Policy G2 is not objective and fails to identify the negative elements of Green Belt protection, including failing to meet housing and affordable housing needs, forcing new development to leapfrog the Green Belt resulting in unsustainable commuting patterns, and increased pressure to develop on urban open spaces and employment sites to meet housing needs.

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## APPENDIX 1: SITE LOCATION PLAN

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- LIH Site
- Crayford Business Corridor Strategic Industrial Location
- Orpington High Street



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