

Sadiq Khan
New London Plan
GLA City Hall
London Plan Team
London
SE1 2AA

1st March 2018
Reference JFMW 195

Dear Mr Khan,

DRAFT LONDON PLAN REPRESENTATIONS ON BEHALF OF MODOMO

I write on behalf of my client Modomo to make representations to the Draft London Plan that is currently out for consultation.

Introduction

Modomo are a startup modular housing specialist firm seeking to provide temporary homes across London. Modomo have aspirations to develop their modular housing model as a solution to creating quick and affordable homes at a large scale in order to address the rapidly growing housing demand.

Representations

Guidance on temporary/meanwhile uses is contained within Policy H4 of the Draft London Plan. The Policy states:

“Boroughs are encouraged to identify opportunities for the meanwhile use of sites for housing to make efficient use of land while it is awaiting longer-term development”.

My client strongly supports the thrust of this policy which illustrates the importance of meanwhile uses as a form of contributing to the increased housing targets. However, the policy presents an opportunity to expand the influence of meanwhile housing within London and we argue that there are further prospects to explore with regard to supporting modular housing in the London Plan.

Wording of Policy

Whilst the thrust of the policy is strongly supported, we consider the London Plan can further encourage the provision of meanwhile housing. The supporting text makes allowances for the

identification of sites appropriate for meanwhile housing, however there should be a stated **presumption in favour** of temporary housing for sites awaiting longer-term development. This will encourage developers to identify sites they believe are appropriate for this form of housing which can further contribute to individual housing targets.

The National Planning Policy Framework (NPPF) advocates for a presumption in favour of sustainable development and states that planning must be a creative exercise in finding ways to enhance and improve the places in which we live our lives. Paragraph 14 of the NPPF reiterates that the presumption in favour of sustainable development should be seen as a golden thread running through both plan-making and decision-taking. In accordance with this, developers should not have to wait for Local Authorities to allocate sites for meanwhile uses – development that is sustainable should go ahead without delay, therefore there must be scope within the policy for a presumption in favour of sustainable development where modular housing schemes/sites are coming forward. They offer a creative way of providing affordable housing whilst widening the choice of high quality homes, thus are in full accordance with the aims of the NPPF and this should be reflected in Policy H4 of the Draft London Plan.

Furthermore, there should also be scope for the potential fast-tracking of temporary housing planning applications as they will not be present in the long term, yet can still deliver highly sustainable social homes for London's growing population. The fast tracking process could potentially only focus on certain conditions such as transport and highway implications of the development and local amenity considerations. Due to the nature of the use, fast tracking applications can have the effect of delivering housing at a faster rate allowing Local Authorities to more efficiently meet their housing targets.

The temporary use of a site for meanwhile housing should therefore be further supported through additional text in the policy, allowing for a presumption in favour of this type of development when determining planning applications and a fast track process for development which only considers certain conditions such as transport and highway implications and residential amenity requirements as set out elsewhere in London Plan documents. It is also considered that greater flexibility should be incorporated into the policy in terms of identifying sites for meanwhile uses. Where a site has been vacant for a certain period of time (for example 1.5 years), it should be considered appropriate for modular housing which can provide an immediate and efficient use.

Supporting text

The supporting text to the policy encourages precision-manufactured homes, stating these can reduce construction time and the units can potentially be reused at a later date on another site. This text is strongly supported by our client who seeks to provide similar modular housing on appropriate sites.

Conclusion

Policy H4 of the Draft London Plan is strongly supported by our client as it will help deliver much needed homes quicker and more efficiently than conventional housing across London. Fast tracking such applications for meanwhile housing can also exponentially increase the rate in which boroughs can deliver temporary housing. Furthermore, there should be a stated presumption in favour of modular housing within the policy to encourage this imaginative and important initiative. Modular homes are exactly the type of use that is described in Policy H4 and Modomo are in full support of the inclusion and expansion of such a policy in the London Plan.

Yours sincerely,

John Ferguson BSc (Hons), PG Dip TP, MRTPI

Director