

Sadiq Khan (Mayor of London)
New London Plan
GLA City Hall
London Plan Team
Post Point 18
London, SE1 2AA

2nd March 2018

Dear Sir,

DRAFT NEW LONDON PLAN – REPRESENTATIONS ON BEHALF OF ORBIT HOUSING ASSOCIATION

CBRE Limited ('CBRE' hereafter) is instructed by Orbit to submit representations in response to the draft new London Plan (December 2017).

Orbit is one of the largest housing associations and housebuilders in the UK, with over 50 years' experience and a vast portfolio of more than 40,000 homes across the Midlands, East Anglia and the south east, including areas of London. Orbit reinvests its profits into their mission of building communities, enabling them to deliver around 1,900 new homes each year, from social and affordable rent to market sale and shared ownership. The ambition is to deliver 2,000 properties each year post 2020.

Orbit has significant landownership across London, most notably within the borough of Bexley. Within Bexley alone, Orbit owns and manages more than 4,600 homes and have an active development programme focused around the Erith and Slade Green areas. Following the successful regeneration of the Lerner Road Estate into the award-winning Erith Park scheme, Orbit is now embarking on the redevelopment of the Arthur Street Estate within Bexley to create a more sustainable and inclusive community.

Alongside building homes, Orbit works closely with local partners to provide a network of support and advice services. Each year Orbit invests more than £3 million back into the communities they work in.

Orbit recognises the importance of the Mayor's draft new London Plan for guiding development and good growth principles across the city, and as such welcomes the opportunity to provide comments in relation to the Plan's general ethos and with regards to specific policies.

These representations are structured to firstly provide overarching comments on the key themes of the Plan which Orbit has identified are important in respect to their mission and landholdings. Following on from these general comments, appended to this letter is a table setting out detailed comments in relation to certain policies which Orbit believes require further consideration.

General Comments

Orbit welcomes the ambition of the Plan in respect of the Mayor's commitment to addressing London's housing shortage and reducing inequality. The desire at the heart of the Plan to make the best use of London's land to deliver the homes that Londoners need and grow a successful economy is laudable. Furthermore, the creation

of 'Good Growth' principles as a strategic means to guide the sustainable delivery of additional development is welcomed.

However, Orbit considers that the overall purpose of the London Plan is to function as a strategic spatial development strategy for the city. The previous versions of the Plan fulfilled this purpose adequately, however this draft new Plan represents a step change when compared to its predecessors in terms of its more prescriptive and directive policy approach. The new Plan can now be interpreted much less like a strategic policy document, and more as a Local Plan, which in turn will diminish the power of local planning authorities across the city to proactively plan for development in their borough.

For instance, in Bexley, the Council whilst working in partnership with the GLA, has very recently (December 2017) adopted its own 'Growth Strategy' which sets out what sustainable growth in Bexley will look like and how it will be achieved. It is clearly stated within this document that the ambitious growth pattern outlined can only be achieved through a commitment from the Mayor to invest in Bexley's transport infrastructure. The strategy concludes that significant housing growth can be delivered within the borough, but that it can only be fully unlocked when tangible improvements to transport connectivity are delivered. Orbit agrees with the outcomes of the Growth Strategy and acknowledges that Bexley has a marked capacity for growth if public transport links are improved. As such, Orbit is fully supportive of the suggestions in the new Plan for the Elizabeth Line to be extended to Slade Green.

However, rather than the Mayor recognising that local authorities such as Bexley have their own planning framework for enabling sustainable housing growth over the coming years, the new Plan has sought to instead set its own prescriptive targets for housing growth. In the case of Bexley, this has led to their annual housing delivery target being tripled (446 per annum to 1,245) without having the necessary public transport improvements in place to support this level of growth. On this note, we understand that the London Borough of Bexley (LB Bexley) is also submitting representations to the Plan and Orbit supports the assertion contained within its representations that many areas in the borough do not yet have the committed, or even planned, level of new sustainable transport infrastructure to allow for the high density and mixed-use development needed to support Bexley's proposed new housing target. Orbit further supports LB Bexley's statement that it must be a prerequisite that infrastructure projects are at the very least committed to financially, rather than just 'planned for' prior to the delivery of the high levels of housing growth which are predicated on these infrastructure improvements.

Whilst the Plan is designed as a strategic document to cover London, there is limited nuance provided within the policies to identify differences between development proposals for sites within Inner and Outer London. Particularly in relation to high density development, for Outer London boroughs such as Bexley which are more suburban in their character, there needs to be a recognition across the housing and design policies that higher density development within Outer London will require careful consideration of its context, both existing and future where known or committed. A 'one size fits all' approach to development across boroughs is neither desirable nor practical and does not reflect the 'Good Growth' principles which underpin the Plan.

As a registered provider, Orbit is supportive of the Mayor's drive to increase the supply of affordable housing in London. This is welcomed alongside the positive emphasis which runs through the Plan on creating more mixed and inclusive communities. This aspiration should include an appreciation that sometimes this objective will need to include the introduction of more market housing, particularly in deprived areas where there is already a concentration of social housing, and particularly in the context of estate regeneration schemes within deprived areas. Specifically, Orbit welcomes the flexibility provided in paragraph 4.7.2 to allow for a tailored approach to affordable housing tenure mix by borough if it is felt a broader mix is more appropriate in certain locations. Orbit considers that this will assist in achieving the Mayor's aspirations of more mixed and balanced neighbourhoods. However, Orbit is disappointed that this flexibility in relation to the choice of tenure mix for new affordable housing has not been replicated as part of the draft estate regeneration policy (H10).

The requirement for like-for-like replacement of the same type of affordable housing tenure under draft Policy H10 is restrictive and presents viability challenges for the regeneration of some of Orbit's existing housing stock, most notably the Arthur Street Estate. For mono-tenure social rent estates such as this one, where density cannot be dramatically increased to allow for like-for-like alongside the introduction of new housing tenures, there is a risk that estate regeneration will just recreate the same mono-tenure estates, rather than creating more diverse communities. This policy requirement will only make it harder for estate regeneration schemes to come forward, and could lead to fewer high-quality affordable homes for Londoners being delivered across all tenures. Orbit believes a more flexible approach is required, one which recognises the complexities involved with estate regeneration on a site-by-site basis and responds to proposals on their own merits, whilst recognising the broader benefits estate regeneration can offer local communities. This should run alongside the key objective to deliver mixed and inclusive communities, which in turn helps to improve values of an area generally. This will then encourage more development in low value areas; estate regeneration can be a catalyst for wider growth.

We note that as part of LB Bexley's response to the draft Plan, they directly acknowledge the existence of Arthur Street as a mono-tenure estate within the borough. Their response goes on to state that a no net loss of affordable housing approach as set out under draft Policy H10 will reduce the potential to create more mixed and sustainable communities, as well as potentially affecting the viability of schemes. LB Bexley concludes with a position that aligns with Orbit's in that a more flexible approach is required for estate regeneration which takes account of the specific circumstances of each site, alongside local housing need, viability and the nature of the surrounding area.

Further detailed commentary on Orbit's stance in relation to the Mayor's position on estate regeneration is provided under the policy table appended to this letter.

Lastly, Orbit is concerned that it appears significant weight is already being attributed to the draft policies contained within the Plan when determining current planning applications. Only minimal weight should be applied to draft policies which are yet to be submitted to the Secretary of State for Examination in Public, however recent Stage 2 decisions made by the Mayor have made reference to, or refused applications, on the grounds of a failure to adhere to draft policy contained within the draft Plan. As the Plan is yet to finish its first round of formal consultation, and is not anticipated to be formally adopted until Autumn 2019, it is considered premature for significant weight to be added to policies contained within the draft Plan when determining applications now. The weight attributed to the draft Plan increases as it progresses through the consultation process. At this stage, applications should be assessed against adopted strategic policy, rather than draft policy from the Mayor.

Furthermore, it is clear policies in the draft Plan have been heavily informed by recently adopted Supplementary Planning Guidance (SPG) documents, notably the Housing and Affordable Housing and Viability SPGs. It is concerning that these SPG documents are being used to guide development principles for proposals and applications now, despite the fact they are based on draft policy which was not formally consulted upon and is yet to be independently reviewed by the Planning Inspectorate. Best practice would have been for these documents to have been published following adoption of the Plan rather than before.

Summary

Appended to this letter is a table setting out Orbit's comments in relation to specific draft policies contained within the Plan. This should be read in conjunction with the general comments set out above.

We trust that these representations are clear and will be fully considered, and we would welcome confirmation that they have been received. We would also welcome further engagement with you as the draft Plan progresses to help shape future policy.

Yours faithfully,

**SARAH STEVENS
SENIOR DIRECTOR**

APPENDIX 1 – ORBIT’S RESPONSE TO INDIVIDUAL POLICIES

| CHAPTER | POLICY | ORBIT REPRESENTATIONS |
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| 1. Planning London’s Future (Good Growth Policies) | | |
| | <u><i>Policy GG2 – Making the best use of land</i></u> | Orbit supports the principle of the policy, but it needs to acknowledge that for sites within Outer London which are not located within close proximity to main transport hubs and have poor PTAL ratings, it may be more difficult to intensify the use of the land for housing as these sites are not supported by adequate transport connections. |
| | <u><i>Policy GG3 – Creating a healthy city</i></u> | Orbit support the principle of ensuring that development positively affects health and community wellbeing. However, assessing the potential impacts of development proposals on the health and well-being of communities can, in practice, be difficult to quantify and measure. The requirement for applications to be accompanied by a Health Impact Assessment has the potential to be overly onerous, particularly given the scale of other planning application documents that are required. Orbit welcomes further guidance on the requirements of Health Impact Assessments. |
| | <u><i>Policy GG4 – Delivering the homes Londoners need</i></u> | Orbit strongly supports the creation of mixed and inclusive communities. There should be a recognition that in many cases this will need to include the introduction of market homes in deprived areas where there is a concentration of social housing. Orbit considers that ‘Genuinely affordable’ does not necessarily always have to mean London Affordable Rent and that in certain locations other types of housing tenure can be considered ‘affordable’ including market salehomes. This will also lead to creating more mixed and balanced communities. For instance, within Orbit’s Erith Park development market sale properties are priced at c.£265k for a two-bedroom flat, which would be affordable for households on an annual income of £53k. With Help to Buy, the unit would be affordable for those households on an annual income of £37k. The Mayor expects intermediate rented homes to be affordable for those earning less than £60k. As demonstrated by the above figures, outright sale could be an option for those seeking to buy in certain locations within Bexley. As such, there should be a recognition that market sale and intermediate products could also be genuinely affordable within Outer boroughs in London which have lower house prices. |
| 2. Spatial Development Patterns | | |

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| | <p><u>Policy SD1 – Opportunity Areas</u></p> | <p>Orbit is supportive of the allocation of Bexley Riverside as an Opportunity Area. However, for this Opportunity Area to function and grow successfully there needs to be significant planned transport infrastructure improvement works.</p> <p>Orbit therefore welcomes the suggestion in paragraph 2.1.53 that the Elizabeth Line should be extended to Slade Green and beyond. Furthermore, Orbit supports the statement in LB Bexley’s representations that this paragraph should also refer to the potential DLR extension to Bexley Riverside that is needed to support high density development and access to Belvedere.</p> <p>Orbit supports the identification of Belvedere as a ‘District Centre’ in line with LB Bexley’s Growth Strategy.</p> <p>Orbit considers that the requirement under draft paragraph 2.1.54 for Bexley Riverside to play a significant role in industrial and logistics use, ensuring that there should be no net loss of industrial floorspace capacity, presents a missed opportunity in terms of releasing land here which is prime for residential redevelopment. Particularly where industrial land has been vacant for a long period, or has been identified as surplus to requirements, local planning authorities should be able to release this for other more suitable uses, such as a residential.</p> |
| | <p><u>Policy SD6 – Town Centres and SD8 – Town Centres: development principles and Development Plan documents</u></p> | <p>Orbit welcomes the encouragement of residential use within town centres and the acknowledgement of the suitability of town centre schemes for smaller households.</p> <p>Orbit supports the redevelopment and change of use of surplus office space in town centres to other uses, including housing.</p> <p>Noted that there seems to be a presumption in the policy that a town centre has excellent transport links. However, this is not always the case, for example Bexleyheath is not adjacent to any rail or underground stations and is instead served only by local bus routes.</p> |
| | <p><u>Policy SD10 – Strategic and local regeneration</u></p> | <p>Estate regeneration can play a critical role in challenging deprivation within the Strategic Areas of Regeneration identified and acts as a catalyst to encourage further development. This should be reflected within the policy and supporting text.</p> |

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| | | <p>Within deprived areas, the provision of mixed and inclusive communities (which is promoted as a key aspiration throughout the Plan) is critical to challenging the social stigma attached to certain locations and helping optimise the regeneration potential. Consequently, this means the requirement under draft Policy H10 for like-for-like replacement is not always possible or desirable on mono-tenure social rented estates where existing density levels cannot be significantly increased. As such, Orbit considers it can be more sustainable in certain instances for the re-provision of social housing required as part of estate regeneration schemes to be dispersed across the borough as part of a programme approach. This will prevent further mono-tenure estates from being created/maintained and whose existence only deepens existing spatial inequalities and social barriers.</p> |
| 3. Design | | |
| | <p><i><u>Policy D2 – Delivering good design</u></i></p> | <p>Supporting draft paragraph 3.2.9 seems to suggest that the Mayor will seek to limit the use of non-material and material amendment applications to planning permissions. Whilst Orbit recognises the importance of maintaining the design quality of a permitted scheme, it can be necessary following further detailed design work at the post planning stage for amendments to be required.</p> <p>It should be at the discretion of the local planning authority to determine whether an amendment application is acceptable, and if the cumulative impact of various amendment applications will lessen the scheme’s design quality. It is not the role of the London Plan, as a strategic document, to limit the use of minor amendment applications.</p> <p>In relation to draft paragraph 3.2.10, the potential use of architecture retention clauses as part of planning conditions is not supported by Orbit. The control of detailed design remains with local planning authorities and does not require the inclusion of an architect retention condition to ensure high-quality design is maintained.</p> <p>Whilst Orbit agrees that often it is desirable to keep consistent architectural input throughout a process such an approach unnecessarily restricts the selection of architects and suggests improvements to the design of schemes cannot be made by the appointment of subsequent architects.</p> |
| | <p><i><u>Policy D4 – Housing quality and standards</u></i></p> | <p>Orbit fully supports the requirement for developments not to differentiate between different housing tenure types.</p> |

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| | | Orbit supports the statement under draft paragraph 3.4.10 that a variety of approaches to housing typologies and the layout of buildings should be explored. The draft Plan makes reference to supporting the form and layout of a place to be ‘street based’. It would be useful for the supporting text to draft Policies D1 and D4 and/or the glossary to provide a definition of ‘street based’ which is understood to comprise: providing clearly defined public and private environments, and active frontages to engender streets-based activity and provide a sense of safety. |
| 4. Housing | | |
| | <i><u>Policy H1 – Increasing housing supply</u></i> | Orbit recognises that there is a pressing need to accelerate the delivery of housing across London. However, Orbit also agrees with the position stated in LB Bexley’s written representations that the revised annual housing target of 1,245 new homes is unrealistic and that there is a lack of committed, or even planned, new transport infrastructure improvements to support the housing supply target set for Bexley. To have comfort that this revised housing target is reasonable and achievable, Orbit welcomes commitment from the Mayor and TfL that there will be major transport infrastructure improvements implemented to serve Bexley, and the timetable for doing so. |
| | <i><u>Policy H2 – Small sites</u></i> | Orbit supports the presumption in favour of small sites and the recognition of the role that this type of development can play in delivering new housing. However, Orbit has concerns that LB Bexley’s annual target of 865 new homes per annum to be delivered from small sites is not based on the SHMA and question the methodology it is based on. |
| | <i><u>Policy H5 – Delivering affordable housing</u></i> | Orbit supports the Mayor’s drive to increase the supply of affordable housing across London. In relation to the requirement for public sector land to deliver at least 50% affordable housing across its portfolio, for situations where public sector land has been purchased by a private landowner there is a lack of clarity as to whether this land is still subject to the 50% requirement? Orbit request confirmation that in such situations, the land is no longer defined as ‘public sector land’ once the land title and register has been transferred. |
| | <i><u>Policy H6 – Threshold approach to applications</u></i> | As per comments under draft Policy H5, Orbit welcomes confirmation on land which is purchased and which was previously under public sector ownership is not required to fulfil the threshold affordable housing target of 50%. |

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| | | <p>In response to the threshold requirement of 50% affordable housing provision for industrial sites, Orbit considers that this figure should be reduced and instead the provision on these sites should be considered on the same basis as other sites. This is because the redevelopment of industrial/brownfield land can present significant viability challenges which can make a development unviable if 50% affordable housing is also required as a minimum. We would question the assumption about the difference in values between industrial and residential development, in some cases the value of land in industrial use in some areas can be equivalent to land in residential use, making a 50% requirement for affordable housing unachievable.</p> <p>Orbit considers this high threshold level may prevent housing coming forward on appropriate industrial sites, which in turn could lead to boroughs ambitious housing delivery targets not being achieved.</p> <p>In relation to draft supporting paragraph 4.6.14, Orbit would welcome a definition as to the scale of 'demolition of existing dwellings' which would trigger the requirement for schemes to follow the Viability Tested Route. Orbit understand that this relates to estate regeneration, rather than the demolition of, for example, a singular house.</p> <p>Orbit seeks clarity on the wording of draft paragraph 4.6.14.</p> |
| | <p><u>Policy H7 – Affordable housing tenure</u></p> | <p>Orbit is supportive of the statement under draft paragraph 4.7.2 that within some boroughs there may be a need for a broader mix of affordable housing tenures due to viability constraints or in order to create more mixed and inclusive communities. Orbit considers that a single approach to tenure mix across London is not appropriate or responsive to local borough needs, and that local planning authorities, in conjunction with developers, should be able to determine the optimum tenure split for a site based on the local context. This flexibility should also be applied to estate regeneration schemes.</p> <p>Orbit welcomes the flexibility provided under paragraph 4.7.13 for sites providing over 75% affordable housing offer to follow the Fast Track Route regardless of tenure mix, as long as the type and tenure are supported by the borough, and the new homes are considered to be genuinely affordable.</p> |
| | <p><u>Policy H10 – Redevelopment of existing housing and estate regeneration</u></p> | <p>As stated within these representations, Orbit objects to the requirement for like-for-like replacement of the same type of affordable housing tenure homes as part of all estate regeneration schemes. For mono-tenure social rent estates such as Arthur Street in Erith, the ability to deliver like-for-like replacement whilst at the same time introducing new tenures to create a mixed and balanced community is severely constrained by the fact certain sites cannot support significantly increased density whilst also meeting other residential policy and guidance requirements.</p> |

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| | | <p>Like-for-like replacement through optimising density should not take absolute precedent over all other planning considerations. There needs to be flexibility to ensure high-quality design is not compromised, adequate public realm and open space is provided, and the proposals work within the surrounding site context and gain support from the local community.</p> <p>In relation to viability, like-for-like replacement also presents significant viability challenges, even when paired with grant funding. This policy should acknowledge the unique viability challenges estate regeneration schemes face.</p> <p>Orbit seeks clarification as to what the viability assessments for estate regeneration schemes needs to demonstrate, particularly in the context of schemes which are significantly unviable.</p> <p>Orbit is also concerned that prioritising like-for-like replacement is likely to recreate the same stigmatised mono-tenure estates that were there before, rather than creating new inclusive and mixed communities, which is another key aspiration of the draft Plan.</p> <p>Orbit welcomes a policy on estate regeneration that is more positively written and enables estate regeneration proposals to come forward and be assessed on a site-specific basis, particularly where sites fall within deprived areas. Currently the emphasis on like for like replacement may in fact discourage much needed estate regeneration schemes from coming forward due to overly onerous requirements and the viability challenges that such schemes face. This will result in missed opportunities to support regeneration in deprived areas.</p> <p>Orbit is supportive of the statement under supporting draft paragraph 4.7.2 for draft Policy H7 that within some boroughs there may be a need for a broader mix of affordable housing tenures due to viability constraints or in order to create more mixed and inclusive communities. This recognition should be a key consideration when assessing estate regeneration schemes.</p> <p>Lastly, in relation to the programme approach set out under supporting draft paragraph 4.10.5, Orbit fully supports this principle and requests that the text confirms that the programme approach can be utilised both by Councils, applying to units across a borough, and registered providers, where it applies to their portfolio of properties.</p> <p>The programme approach is a fundamental part of creating mixed and balanced communities, and as such, Orbit requests that it is added to the policy text, rather than being included only as part of supporting text.</p> <p>It is important to reiterate that the Mayor’s overarching objectives (as set out in the Good Practice Guide for Estate Regeneration 2018) for any estate regeneration schemes are generally to:</p> <ul style="list-style-type: none"> • Deliver safe and better-quality homes for local people; • Increase the overall supply of new and affordable homes; |

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| | | <ul style="list-style-type: none"> • Improve the quality of the local environment through a better public realm and provision of social infrastructure. <p>Achieving an increase in supply must run alongside delivering quality homes and places. The draft policy needs to refer to these principles.</p> |
| | <p><i><u>Policy H12 – Housing size mix</u></i></p> | <p>Orbit supports the provision that prevents boroughs from setting out prescriptive requirements for intermediate and market tenures. Moreover, Orbit considers that boroughs should also avoid being too prescriptive for low cost rented housing as the housing size mix for this is also based on a range of factors, including viability challenges.</p> <p>In relation to draft supporting paragraphs 4.12.3 and 4.12.4, Orbit welcomes the acknowledgement of the role that the delivery of two-bed units has in providing family housing, and freeing up family housing by allowing people to downsize from their existing homes.</p> <p>Reference to two-bedroom units should be added to the glossary definition of ‘family housing’.</p> |
| 5. Social Infrastructure | | |
| | <p><i><u>Policy S1 – Developing London’s social infrastructure</u></i></p> | <p>Orbit supports the general emphasis in the plan for providing social infrastructure and community facilities.</p> <p>Orbit agrees that the policy measures social infrastructure provision by the actual facility, rather than by floorspace. The historic policy requirement to re-provide social infrastructure by floorspace had the potential to be onerous, particularly if the facility was large in terms of floorspace size, but underutilised/vacant.</p> <p>Where a development proposal results in the need to relocate existing social infrastructure, Orbit supports the suggestion in the policy that it could be re-provided elsewhere in the neighbourhood. The flexibility of not having to re-provide the facility within the application site boundary of the development proposal is welcomed, particularly if developments have to increase housing density. Furthermore, some social infrastructure facilities may not be in the optimum location within the neighbourhood to serve the community and it may be better for it to be relocated to somewhere else within the vicinity as part of wider development proposals.</p> |
| 6. Economy | | |
| | <p><i><u>Policy E4 – Land for industry, logistics and services to support London’s economic function</u></i></p> | <p>Orbit supports the statement within LB Bexley’s representations to the draft Plan that the borough is over-represented in employment terms in wholesale and transport, construction, and manufacturing, whilst being under-represented in high-value professional sectors. As such, Orbit concurs with LB Bexley that as historically industrial land has not been released, the managed release of some surplus industrial land within the north of the borough is appropriate and essential for unlocking housing growth.</p> |

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| | | <p>In further alignment with LB Bexley, Orbit considers that Bexley as a Thames Gateway Borough that includes the Bexley Riverside Opportunity Area should be reclassified as one which is appropriate for 'limited release' rather than retention of industrial land.</p> <p>As stated previously within these representations, Orbit believes that the retention of large swathes of the Bexley Riverside area for industrial land presents a missed opportunity and will not allow for the area to capitalise on the potential of its Opportunity Area designation to provide high-quality housing.</p> |
| | <p><i>Policy E11 – Skills and opportunities for all</i></p> | <p>Orbit fully endorses this policy as it will allow for a wider pool of candidates to be put forward and selected to work on construction projects and as part of the end-user stage. This will go some way to ensuring there is no skills shortage during the construction of developments and will open up job opportunities to candidates within neighbouring boroughs.</p> |
| <p>7. Heritage and Culture</p> | <p><i>No comments</i></p> | |
| <p>8. Green Infrastructure and Environment</p> | | |
| | <p><i>Policy G1 – Green infrastructure</i></p> | <p>Orbit is supportive of the Mayor's aspiration to make London a greener city through the green infrastructure approach and acknowledges the benefits associated with planning, designing and managing the infrastructure in a more integrated way.</p> <p>However, there needs to be acknowledgement in the supporting text to the costs of incorporating certain green infrastructure features into developments and that not all schemes have the capacity to adopt all measures due to site and/or viability constraints, particularly when coupled with the need to maximise affordable housing provision on site.</p> <p>There are also certain features, such as green roofs, that represent significant management costs throughout the life cycle of the development. For schemes which are predominantly affordable housing, the cost to manage the green roofs may compromise the affordability of housing for residents as they will have to pay increased service charges.</p> <p>The supporting policy text should acknowledge that green infrastructure provision is to be considered on a site by site basis.</p> |
| | <p><i>Policy G5 – Urban greening</i></p> | <p>Orbit supports the principle of urban greening, however the recommended target score of 0.4 for predominantly residential developments may be too onerous and difficult for all schemes to achieve. This score may be particularly untenable when considered with the requirement for schemes to optimise housing density, which may reduce a sites capacity to incorporate a suitable number of urban greening measures to achieve a score of 0.4.</p> |

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| | | This policy should refer to a more tailored approach to calculating the appropriate urban greening score for a development is required, taking into account a range of site specific factors. |
| 9. Social Infrastructure | <i>No comments</i> | |
| 10. Transport | | |
| | <u><i>Policy T1 – Strategic approach to transport</i></u> | <p>Orbit support the general principle of reduced car use, however for Outer London boroughs such as Bexley there should be a recognition that the supporting transport infrastructure does not always exist to enable car-free journeys or car free development. Sites with a low PTAL in Outer London should have greater flexibility with regards to car parking numbers as residents/workers still rely on their car in the absence of suitable transport connections.</p> <p>The requirement for additional car parking spaces is a key difference between developments in Inner London, where transport infrastructure is sufficient to enable most journeys to be made without the car; and Outer London, where some residents/workers are not within walking distance of rail or underground stations and use their vehicles as an essential means of travel.</p> <p>Orbit wishes to stress the importance that access to a car can have for predominantly low-income families that they house. Over the last 18 months, Orbit has been working in partnership with Child Poverty Action Group to find out what life is like for the children and young people living in their homes and what practical action housing providers can take to alleviate child poverty. As part of this, they ran focus group sessions in April 2017 with more than 50 parents and children living in their homes. This included a session with residents living in Bexley. The findings of this focus group revealed that lack of access to, and the cost of transport, including public transport, is very limiting for families. It was highlighted that poor public transport links provide huge challenges for the regular routines of parents, such as the school run and food shopping, which can in turn restrict work opportunities. If parents have access to a car this can help alleviate these issues. Orbit would be delighted to discuss the outputs of these focus groups in more detail with the Mayor and his officers.</p> <p>It needs to be acknowledged in the supporting text to draft Policy T1 that that there needs to be a gradual transformation towards the car free approach in poorly connected London boroughs, coupled with significant investment in transport infrastructure.</p> |

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| | <p><u>Policy T3 – Transport capacity, connectivity and safeguarding</u></p> | <p>Orbit supports the Mayor’s intentions to improve transport capacity across London. Orbit particularly welcomes the Bexley specific transport improvement schemes listed in table 10.1. However, Orbit has significant concern about the long lead in time for transport improvements such as the DLR extension to Thamesmead and the Elizabeth Line extension. There is also concern regarding the relationship between increased housing targets and the lack of commitment/timescales as to the delivery of these much needed improvements.</p> <p>As has been made clear throughout these representations, Orbit recognise the need to deliver more housing within Bexley, however this needs to be supported by transport improvements which are confirmed and will be delivered in the short to medium term.</p> <p>Orbit also wants to make clear the potential opportunity Belvedere station presents should station and capacity improvements be undertaken. This could unlock significant development potential in the area and should be identified as such under table 10.1.</p> |
| | <p><u>Policy T4 – Assessing and mitigating transport impacts</u></p> | <p>Orbit considers that for developments in Bexley, a borough which has historically seen a continuous lack of investment in public transport infrastructure, it seems counter-intuitive to significantly increase housing delivery targets, but then potentially withhold planning permission subject to the provision of transport infrastructure. Rather than jeopardise development, a firm commitment is required from the Mayor and TfL to fund a sustained programme of public transport improvements to support growth in the borough.</p> |
| | <p><u>Policy T6 – Car parking and T6.1 – Residential car parking</u></p> | <p>As per comments under other transport policies, car-free or car-lite developments at sites which are not well-connected cannot offer no car parking provision as there is insufficient public transport options. On this basis, Orbit strongly supports the statement under supporting paragraph 10.6.3 that when calculating parking provision, consideration should be given to local circumstances and the quality of public transport provision, as well as conditions for walking and cycling.</p> <p>In relation to the requirement for Electric Vehicle Charging Points, the provision of at least 20% active points will present property management concerns within Orbit’s housing portfolio. These spaces incur higher service charges which may lead to issues of affordability for affordable housing tenants. Orbit seeks more flexibility with the application of this policy and the recognition that more passive spaces may be appropriate in the first instance, subject to evidence being presented to local planning authorities at the planning application stage. Local planning authorities could then make the decision based on local circumstances.</p> <p>Orbit strongly supports the provision of one designated disabled parking bay per dwelling being available for the first 3% of dwellings.</p> |

| CHAPTER | POLICY | ORBIT REPRESENTATIONS |
|-----------------------------|--|---|
| 11. Funding the London Plan | | |
| | <p><u>Policy DF1 – Delivery of the Plan and Planning Obligations and supporting paragraphs 11.1.17-11.1.25</u></p> | <p>Orbit is pleased to see the recognition within Chapter 11 that there is a need for significant public-sector investment to deliver the ambitions of the Plan. As has been stated throughout these representations, increased investment in transport infrastructure will be vital to achieve the growth potential of areas in Bexley such as Belvedere, Erith and Slade Green.</p> <p>Policy DF1 sets out a new approach to viability testing of developments and it is a positive approach to restrict viability testing to sites that have clear barriers to delivery. It is welcomed that the policy recognises that this includes areas “where value generated is exceptionally low”. This is particularly important as, by definition, these are areas which could meet a need for affordable outright sale homes, but where it is crucial that low values do not drive down quality or dilute place-making ambitions. To attract Londoners to live in the lower value areas the offer must be for high quality homes, green spaces and social infrastructure supported by improved public transport. Therefore either additional subsidy or reduction in other contributions are necessary to promote significant housing in these most affordable areas.</p> <p>It is disappointing that there is no recognition within this chapter to the special case of funding for Estate Regeneration. To improve the homes and health of existing social tenants through estate regeneration in low value areas is extremely challenging financially and this should be recognised specifically here.</p> <p>Orbit supports the statement in draft supporting paragraph 11.1.18 to expand the range of delivery models and the tenures and types of homes delivered. Housing Associations such as Orbit are well placed to help achieve this ambition. Orbit is committed to providing a full range of tenures and housing options for all and that these should be in mixed and balanced communities with no distinction in the homes on offer just dependent on how a family is paying for their home.</p> |
| Glossary | | |
| | <p><u>Family Housing</u></p> | <p>As stated under the comment for Policy H12, Orbit request the inclusion of two bedroom units within the definition for family housing.</p> |
| | <p><u>Habitable Rooms</u></p> | <p>Orbit requests the inclusion of a standardised definition of habitable room as boroughs across London currently use different definitions.</p> |