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Sadiq Khan (Mayor of London)
New London Plan
GLA City Hall
London Plan Team
Post Point 18
FREEPOST RTJC-XBZZ-GJKZ
London SE1 2AA

2 March 2018

Dear Mr Mayor,

Draft London Plan

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I write on behalf of PRP, an interdisciplinary architecture practice based in London. PRP specialises in the delivery of all forms of housing from inception to completion. The main focus of the practice is architecture but also includes a number of different disciplines such as Landscape Design, Environmental Services, Sustainability, Project Management, Community Engagement and Planning.

PRP has been in existence for over 50 years during which time the practice has been at the forefront of housing delivery across London and the South East. The experience of the practice spans a multitude of housing tenures and typologies including estate regeneration, PRS, affordable housing, older peoples housing, mixed use schemes and private development. Many of the projects undertaken by the practice have received acclaim from across the built environment industry with the practice winning multiple prestigious awards for its work.

PRP are exceptionally well placed to assist the Mayor in commenting on the draft London Plan with respect to housing choices for older people. PRP have over two decades experience of running a team of some 40 architects who work exclusively in the older persons sector. We are the market leaders in the UK with a portfolio of completed projects from the past 20 years that extend beyond 200 and which represent over 10,000 built dwellings or care beds for older people across the country. Our London experience stretches across 20 of the 32 London Boroughs within which we have completed or have consent for 46 buildings representing some 2,100 dwellings or care beds for older people.

Overall, PRP welcomes the initiative taken by the Mayor to update the London Plan and recognises the focus on good growth and solving many of the inequalities that exist in the capital. PRP also welcomes the increased focus on design within the plan and recognises that it sits in a much more prominent position within the overall document, when read as a whole.

The introduction of Mayoral Design Advocates is a positive step for the quality of housing produced in London and PRP is lucky enough to have Manisha Patel, who is an MDA, as a partner within the practice.

There are several areas where PRP would like to make further representation on and these are set out below.

Policy H1 - Increasing Housing Supply

PRP is aware of the huge challenge ahead for the Mayor in meeting the substantially increased housing target of 64,935 homes per year across the capital. Whilst PRP recognises the increased onus on boroughs through the 10 year targets, the policy is ambiguous in what the target will be at the end of the 10 years. A range of boroughs are currently producing emerging plans which will have a longer lifespans than the 10 years

set out in policy H1 and this level of uncertainty is not helpful in the preparation of longer strategies for individual boroughs. Enclosed with this response is analysis which has been undertaken by PRP following the release of the revised housing targets.

There is also a lack of clarity within policy H1 on what happens in the event that individual boroughs do not meet the annualised or 10 year housing targets. Research undertaken by PRP demonstrates that many boroughs have consistently failed to meet their housing targets set by the Mayor. In the event that targets are missed then the Mayor should insist on the shortfall being rolled into successive years and demand that an action plan should be drawn up by the borough to demonstrate to the Mayor how the shortfall will be met.

Policy H2 - Small Sites

PRP welcomes the new focus on SMEs and small sites but is concerned that the potential capacity of these sites to deliver 24,573 dwellings per annum is a significant over estimation of the delivery which could be reasonably expected from this sort of site.

The capacity of London to deliver enough small sites to meet this target is derived from the Strategic Housing Land Availability Assessment. Whilst this is a well put together document it does not assess the number of small sites in an accurate way. The figure of 24,753 dwellings per annum is therefore very much an educated guess by the Mayor at potential delivery rates from small sites. Given it is therefore a windfall allowance, PRP questions the additional windfall allowance of 5,738 that is also contained within the plan.

The ability of development within the curtilage of individual houses as set out in policy H2 is also very unlikely to yield a significant amount of housing. Developing in existing back gardens in residential areas is very difficult with significant implications for the character of the existing area. The reliance on this type of development to contribute as part of small sites should not be relied upon.

The comments as set out for policy H1 in relation to the 10 year housing targets is also applicable to policy H2 which disaggregates the 24,573 dwelling target by borough. However there is no suggestion or guidance to individual boroughs on what the target might be after 10 years nor is there any indication of the mitigation which is in place should boroughs not meet this target.

PRP has experience of small sites across the capital and is well aware of the difficulties in developing on highly constrained sites. Two such sites which PRP were involved with were as part of a number of infill sites across the Parkside Estates in the London Borough Tower Hamlets.

Hitchin Square

- 6 houses
- Estate infill
- Land owned by HA
- Former garage site

Armagh Road

- 8 flats and community room
- Estate infill
- Land owned by HA
- Former construction training centre

Costs	Hitchin Sq.	Armagh Rd
Contract sum	£1,441,382	£1,650,568
Total scheme costs*	£1,714,535	£1,947,308
Cost / m ²	£2,600	£1,872
Cost / dwelling	£285,730	£243,413
Add 3.5yr inflation	£342,870	£292,095

*EXCLUDED LAND COSTS



Both sites were significantly constrained in planning and urban design terms. PRP Successfully brought forward development on both with a registered provider. What is notable on both of the sites were the high construction costs as set out in the table above. These prices do not include the land value as the sites were in the ownership of the client, a housing association. The contract was awarded 3.5 years ago, hence the inflation uplift allowed within the figures.

In order for the Mayor to be successful in his pledge to deliver significant numbers from small sites there needs to be much more recognition of the inherent difficulties in bringing forward development on such constrained pieces of land.

It is noted that policy H2 requires boroughs to prepare an 'area wide design code' in relation to small sites and that a presumption in favour of development of small sites would be applied where a proposal is in accordance with this design code.

The London Plan is unclear on the form of these design codes and how they will be prepared. Given the diverse character and nature of most London Boroughs it is unlikely that a single design code would be sufficient to cover the entire borough. The varying nature of the design codes and the task of getting at least 35 separate codes in place by 2019 represents a significant challenge for the Mayor. PRP requests that further information is given on the preparation of design codes and their role in determination of applications in the supporting text which accompanies policy H2.

Policy H5- Delivering affordable housing

The drive from the Mayor to increase the provision of affordable housing across the capital is welcomed by PRP. Access to cheaper forms of housing is vital if London is to retain its status as a global city.

The threshold approach as set out in policy H6, as already established in the Affordable Housing SPD, is welcomed in providing clarity to developers who would like to avoid a protracted viability route for any application. However, it is noted that in part B of policy H6 it states that the 35% threshold will be reviewed in 2021 and if necessary reviewed through supplementary planning guidance (SPG). This statement causes uncertainty around the future of the threshold approach which is not helpful to providers of housing currently developing longer term investment strategies for the capital. Furthermore, a change in SPG would not have the effect of successfully altering the thrust of policy H6 which would remain in place and a conflict would therefore be created in planning policy terms.

It is requested that further clarity is provided by the Mayor on the future of the threshold approach as set out in policies H5 and H6.

Policy H7 - Affordable Housing Tenures

Policy H7 sets out that affordable housing tenure will be split for developments at 30% social/affordable rent, 30% shared ownership, and the remaining 40% to be decided by the individual borough. This approach provides a significant change in affordable housing tenures from borough to borough which creates ambiguity for registered providers and developers who operate across the capital.

As with the affordable housing threshold approach, it is also stated within policy H7 that the tenure split will be reviewed in 2021 and addressed through a further SPG. This also creates uncertainty for developers wanting clarity on investment in housing in the capital. The ambition of the Mayor to address any change through an updated SPG will also create potential conflict between future guidance and policy within the adopted London Plan.

Policy H9 - Vacant Building Credit

The Mayor is unequivocal in his stance that Vacant Building Credit (VBC) is unlikely to bring forward much development in London and is not deemed as appropriate.

In reality, VBC was introduced through a Written Ministerial Statement in 2014 and is applicable throughout the country regardless of geographical location. It is therefore not within the remit of the Mayor to decide not to apply this in London due to concerns over the provision of affordable housing.

Policy H13 - Build to Rent

The inclusion of a specific policy in relation to build to rent is welcomed by PRP as this sector represents a significant increase in housing delivery across the capital in the past 5 years. Whilst a criteria based policy is appropriate to deem whether a scheme falls into a build to rent typology, further guidance and focus is required on the exit strategy of build to rent schemes. On the basis that most build to rent schemes are brought forward with a covenant to secure the units for rental for an initial period, the focus for many PRS developers is on the ability to sell the units as general needs housing after the covenant period has ended.

It is therefore important to ensure that the proposed PRS blocks are designed in a manner such that any future change in tenure to general needs housing is not detrimental to either existing or proposed residents or indeed the character and vitality of the surrounding area, including the potential impact on the local housing market.

Policy H15 Specialist older persons housing

The Mayor should be aware of the House of Commons, Communities and Local Government Committee Report on "Housing for Older People" dated 9th February 2018. PRP welcomes the findings in this report and consider them to be in direct conflict with the policies as set out in the draft London Plan.

In the forward of the draft London Plan at page XV the Mayor sets out his aspiration to create a "city that supports the health and wellbeing of all Londoners." This is set out further at paragraph 0.0.5 of the introduction which explains that in preparing the new London Plan the Mayor has had regard to "Reducing health inequality and promoting Londoners Health." PRP is a forceful advocate of health and wellbeing in housing but as set out below the current policies in relation to housing for older people fall dramatically short of achieving the aspirations of the Mayor in this regard.

Housing with care for older people of all tenures will have a huge impact on the health and wellbeing of all Londoners, reducing NHS pressure and empowering older people to be more independent and healthier. Financial wealth does not mean that an older person does not put strain on social and healthcare budgets.

PRP supports the Mayor in the drive for 'Good Growth' in the capital and welcomes the focus on the delivery of affordable housing across all London Boroughs.

There is a key focus under policy GG4 on delivering the homes the Londoners need. This is a clear priority for mayor but does not specifically mention the delivery of housing for older people for which there is a clear and apparent need as identified within the evidence base which supports the emerging London Plan.

The own anecdotal evidence from PRP demonstrates a dramatic increase in developers of private sector housing with care trying enter the London Market but are unable to do so effectively because of the current policy position which is continued in the emerging London Plan.

Establishing the need for Specialist Older Persons Housing in London

The 2017 Strategic Housing Market Assessment (SHMA) (November 2017) establishes that the fastest rates of population growth are expected to be among older age groups (due both to the ageing of 'baby boomers' and rising life expectancies), which in turn will

accelerate growth in the number of households due to the propensity of older people to form smaller households.

The SHMA goes on to note that the number of people aged 65 or more is projected to increase by 73% between 2016 and 2041, and the number of those aged 75 or more by 94%.

Recent figures released by the ONS states that the highest increase in life expectancy in the last 10 years across all boroughs in the UK was actually in Camden.

The increase in life expectancy figures across the capital also means that older people are living less well for longer. There will be a clear exponential increase in the older 'less well' population of London which is not a steady state. This growth has been significantly overlooked by the Mayor in a way which is concerning to PRP and must be urgently addressed.

The 'Older Londoners and the London Plan: Looking To 2050 - A Report for the Greater London Authority 2016' establishes a total potential demand across all tenures for just over 4,000 of 'C3' specialist homes for older people (both extra-care and sheltered housing) and 870 new 'C2' care home beds (including units designed to support the needs of people with dementia every year between 2017 and 2029).

The GLA Older Persons Housing Needs Assessment 2017, prepared by Three Dragons, actually shows a reduction in the total stock of specialist housing by 600 units from 2015-2017 which is mainly due to the decommissioning of older blocks across London. Furthermore, whilst there are numerically enough Care Home beds to meet need, there are significant issues with the quality of accommodation provided.

This established need is pressing and urgent but is currently focused on later specific policies within the emerging plan. The need for housing for older people should be firmly established within the central thrust of policies relating to 'Good Growth' in London.

The supporting text of policy H15 as set out in paragraph 4.15.2 states that some older Londoners may wish to downsize, move closer to family or friends or be closer to services and facilities, but they may not want to move into specialist older persons housing.

PRP believe this statement to be true but it overlooks older Londoners who need to downsize and have no choice over when or where they go in to specialist accommodation. The lack of supply across all London boroughs means that older Londoners are frequently forced to move away from, rather than closer to, their friends and family. Loneliness has been identified as a key risk in the mental health and wellbeing of older people and should be addressed as a priority within the emerging London Plan.

Use classes for specialist older persons housing

In paragraph 4.15.3 of the supporting text for policy H15, definitions are applied to the different typologies of specialist housing. Sheltered Accommodation is defined as C3 and this is supported by PRP. However extra care accommodation (also referred to as assisted living, close care, or continuing care housing) is also defined as C3 and this is where there is a high level of ambiguity and potential of unintended consequences of this definition.

The supporting text quite rightly identifies that extra care accommodation is self-contained residential accommodation and associated facilities, designed and managed to meet the needs and aspirations of older people, and which provides 24-hour access to emergency support. A range of facilities are normally available such as a residents' lounge, laundry room, a restaurant or meal provision facilities, classes, and a base for health care workers. Domiciliary care will be available to varying levels, either as part of the accommodation package or as additional services which can be purchased if

required. However the 'range of facilities' as identified above is patently not C3 accommodation and this requires careful consideration.

The GLA topic paper: specialist older persons housing (November 2017) supports the thrust of policy H15 and cites a number of sources of how use classes should be viewed in the context of specialist housing. The Royal Town Planning Institute Good Practice note 8 Extra Care Housing development planning, control and management states it is 'problematic' as the regulations stand, to issue definitive local guidance on planning treatment of extra care housing. However the draft London Plan does just that and takes a binary approach to use classes of Specialist Housing where it is clear that this is detrimental to its positive provision of different housing typologies.

The GLA Topic Paper wrongly distils down the complex issue of C2 v C3 in specialist housing typologies to two narrow areas of the 'front door test' and the level of care that residents are obligated to receive.

This narrow approach to the use class of specialist housing is wildly at odds with the much more pragmatic advice as set out in the Mayor's Housing SPG (2016) which sets out at paragraph 3.7.18 that inter alia:

Consultants suggest that the most robust way of distinguishing between the two is the 'front door' test – if the unit of accommodation has its own front door then it is usually C3, if not it is C2. However, development management experience suggest in many cases this may require some refinement to take appropriate account of the components of care and support and level of communal facilities such as those associated with some Extra Care schemes where units may have their own front door but functionally are effectively C2. Providing the proposal is justified by identified need and addresses wider policy considerations, the planning system should not be used to restrict development of either – this is an evolving market and provision should not be constrained by what, in need terms, might appear to be an arbitrary and perhaps dated planning distinction.

The Housing SPG goes on to state at paragraph 3.7.19 that:

However, neither should development proposals be categorised incorrectly (perhaps to avoid S 106 contributions which are normally expected of C3 development). This is an area in which boroughs should carefully consider local needs and viability concerns in taking decisions about the use of planning obligations.

The position as set out in the housing SPG represents a far more pragmatic stance on use classes than presently being promoted in the draft London Plan. This approach puts onus on the decision maker to use judgement on a variety of information provided by any applicant and is not the binary, 'one-size-fits-all' approach currently being advocated by the Mayor.

There is no doubt that some specialist housing providers seek to justify C2 use in order avoid provision of affordable housing on schemes which are demonstrably C3 and this would clearly detract from the Mayor's mandate for the provision of more affordable housing across the capital. Likewise there are number of C3 schemes which are most likely C2 but are often all affordable and in any event the use class was not determinative in the viability of such a scheme.

However, as established within the evidence base, there is an acute and pressing need for specialist housing of all forms across London and there is concern that this approach could lead to a polarised supply of housing with either Care Homes or Sheltered Housing being provided but nothing in between. This approach would lead to a significant under representation of need within the market for private, independent units with care.

It is noted that both policy H13 (Build to Rent), policy H17 (Purpose Built Student Accommodation) and policy H18 (Large Scale purpose built shared living) are all criteria based policies which set out the requirements placed on schemes in order to be considered as the specific housing typologies as set out under those policies. There is no

reason why a similar approach could not be taken to the determination of specialist housing typologies and what might be considered as constituting C2 or C3 other than a binary front door test.

PRP, along with its network of clients, request that the mayor reconsiders the wording of the supporting text within policy H15 to ensure that a more pragmatic and less binary approach is taken to the definition of use classes for specialist housing schemes.

Affordable Housing for specialist older persons housing

The provision of affordable housing brings with it complexities on viability, not to mention the practicalities of successfully managing different tenures within a single block. The viability of bringing forward affordable housing can put pressure on the provision of meaningful communal space in schemes as this element does not contribute anything financially to the profitability of a scheme. In other cases the provision of communal schemes can add to service charges for residents in the scheme and it is not practical for these to be charged to the affordable housing tenures, leading to even more pressure on private units within any scheme. The requirement for affordable housing will lead to a significant reduction in communal facilities on site to an extent where such provision is meaningless and adds nothing to the amenity of residents. The resulting accommodation is often no more than retirement living flats with a small lounge. PRP is aware from its own experience in the sector that the number of affordable units with care has significantly diminished over the past 10 years. This is an aspect which PRP are able to demonstrate with more detailed data which can be presented to the GLA as the draft London Plan progresses through the examination process.

PRP supports the need for affordable housing and would recommend that for 'extra care' i.e. 'housing with care and additional communal facilities and services' that a graded approach to affordable housing contribution could be taken whereby the well-established intent to provide accommodation for a variety of dependency levels could be considered. All operators/providers of so called 'extra care' aim to have one third of residents as highly dependent, one third as having some dependency and one third having independence. Unless the management company of the building buys back the properties upon vacant possession, it is not always possible to control the make-up of the population going forward and this may not be appropriate. In the end it is very likely that a larger majority of residents would all have dependencies as they age in place but to protect the Local Authority from avoidance of Affordable Housing it could be argued that the contributions be based on the one third of residents that are independent and therefore making a housing choice based on a 'lifestyle' rather than a care need / dependency.

Targets for specialist older persons housing by tenure

The focus on dementia within the supporting text is welcomed by PRP and this is recognised within the evidence base which demonstrates that the total number of older people with dementia in London is forecast to rise from 73,825 in 2017 to 96,939 in 2029, an increase of 31 per cent.

However, despite this recognition, policy H15, and indeed the London Plan in general is largely silent on what is a ticking time bomb within London and society in general. It is clear that there is uncertainty from the GLA on the best method of provision of dementia care or accommodation. This is an extremely specialised form of housing which requires substantial forethought in design and management. However this is not justification for a lack of robust and clear policy direction from the Mayor. Much more must be done to highlight the substantial need for dementia care typologies across London and ensure that boroughs take decisive action within their own plan making and decision taking to avoid the escalation of an already critical social care crisis.

Table 4.4 sets out the Annual borough benchmarks for specialist older persons housing (C3) 2017-2029. It is noted that this table puts all tenures into a single target and this approach is markedly different to Table A5.1 of the current London Plan which shows

'indicative annualised strategic benchmarks to inform local targets and performance indicators for specialist housing for older people 2015 – 2025'. This splits the target into the different tenure types of private rent, intermediate sale and affordable rent which provides a useful target for each tenure per borough. This is helpful in both decision taking and plan making terms for the boroughs and the rationale for putting all into a single target in the emerging plan has not been justified by the Mayor.

PRP request that the emerging London Plan returns to the targets set out for different tenures by borough as established in the current Local Plan.

PRP is supportive of the Mayor's desire to update the London Plan and meet the significant need for housing in the capital. However the approach taken to the provision of specialist housing falls well short of what is required to meet this pressing need. In its current form, the policies concerning specialised housing are worded in a binary way that is not replicated in the more pragmatic, criteria based examples for other typologies of housing. Without significant amendments to the current policy and supporting text concerning housing for older persons, there is a key risk of a dramatic fall in provision of this type of housing to meet what is a critical need across all forms of tenure in the capital.

Policy D1 London's form and characteristics

In the supporting text accompanying policy D1, paragraph 3.1.10 states that circular economy principles should be taken into account at the start of the design process. However the emerging plan should recognise that most Off Site Manufacture (OSM) building systems are inherently inflexible to future adaptation unless specific provision is "designed in" within specific typologies.

Policy D2 Delivering good design

The supporting text of policy D2 correctly recognises the importance of maintaining design quality throughout the development process from planning to completion. It is also right for the Mayor to recognise the consequence of changes to a project following the grant of planning consent.

It is suggested in paragraph 3.2.9 that an assessment of the design of large elements of a development, such as landscaping or building façades, should be undertaken as part of assessing the whole development and not deferred for consideration after planning permission has been granted.

The Plan should recognise that it the landscape element of developments which often bears the brunt of budgetary cutbacks during the on-site stage of a building project (either with or without the client's agreement) and any strengthening of oversight in this matter of quality would be welcomed.

Policy D4 Housing quality and standards

The Plan should recognise the different design challenges and brief requirements presented by large Build to Rent schemes. Flexibility regarding balcony size/provision may therefore be appropriate providing that suitable high quality communal amenities are available to renters.

Policy D8 Tall buildings

The supporting text at paragraph 3.8.9 sets out that safety considerations must be central to the design and operation of tall buildings.

The Plan should recognise the increased danger to residents of wind/environmental conditions at height and balconies should be suitable enclosed or provided with winter-gardens or equivalent.

Policy E7 - Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function

Policy E7 envisages that there may be opportunities to deliver a mix of industrial and residential on the same site either 'side-by-side or through vertical stacking'.

Figure 6.3 shows a simplified illustration of approaches to SIL/LSIS consolidation but in reality this is unrealistic and an extremely unlikely scenario. By their very nature industrial sites are inherently complex and constrained and a one size fits all approach is not helpful. The vertical stacking of B8 would not be acceptable in operational terms to most industrial occupiers or investors. The transition phase as illustrated in figure 6.3 with the new B8 being brought forward prior to residential is extremely unlikely to work in viability terms and most developers would require the new residential to be brought forward first, or at the very least alongside the new B8 uses to make a scheme acceptable.

The concept of co-locating industrial uses alongside residential is complex and requires a high degree of pragmatism and flexibility of design criteria. This must be reflected in the supporting text associated with policy E7.

Policy G2 - London's Green Belt

The Mayor is clear that the green belt will be protected from inappropriate development and this is in accordance with the provisions of the NPPF. However part B of this policy goes on to state that the 'extension of the Green Belt will be supported, where appropriate. It's [sic] de-designation will not.'

This is concerning from a strategic point of view for London. In reality the high target being placed on many out of London Boroughs will mean that they may need to consider the suitability of de-designating low quality green belt land in sustainable areas that could be used for the delivery of housing as part of their local plan process.

Furthermore, this policy position from the Mayor is slightly disingenuous. The basis for Crossrail 2 in chapter 2 of the draft London Plan is predicated on the delivery of 200,000 homes mainly around the northern and southern ends of the proposed line in a variety of opportunity areas. These opportunity areas are mostly areas of green belt which will require de-designation in order to come forward.

It is requested that the wording around the green belt policy within the London Plan should remain precautionary but also pragmatic towards boroughs looking to assess green belt sites which might be appropriate for housing.

Policy T5 - Cycling

The focus on increasing cycling across the capital is supported but the subtle increase in cycle parking for 1 bedroom units from 1 space per unit to 1.5 spaces per unit requires further justification. On a major residential development this marks a significant step change from the existing minimum standard of 1 space per unit. There is often a conflict between adequate provision of cycle parking and achieving strong urban design aspirations such as activating ground floor uses and contributing to placemaking. This will increase the space required for cycle parking in many schemes which reduces the space available for other uses at ground floor level.

Further justification is required for this increase in cycle parking requirement in addition to guidance on how this is to be achieved whilst maintaining other urban design aspirations.

Policy D11 - Fire Safety

PRP welcomes the inclusion of policies around fire safety following the tragedy at Grenfell Tower in 2017. However, a key challenge for the industry since Grenfell has been making adaptations to existing buildings where there are concerns over the safety of cladding already in place. PRP has had a key role in this, working for a number of organisations such as registered providers to submit applications to make changes to cladding. The way in which advice has been provided by individual boroughs and the approach to determination has varied significantly. Given the urgency and importance of these applications, PRP invites the Mayor to work closely with the boroughs to ensure a continuity to approach of recladding applications.

As set out above PRP have unique experience in housing of all typologies and tenures and are committed to creating high quality communities in London. We are keen to work with the Mayor throughout the process of the drafting of the London Plan and look forward to taking an active part in the next steps and examination.

Yours sincerely,

Andy Black
Director of Planning

Enc