



**About Peabody and Family Mosaic**

Peabody is one of the oldest and largest housing associations in London and the Southeast, established in 1862 by the philanthropist, George Peabody. In 2017 we merged with Family Mosaic and now own and manage around 55,000 properties, providing quality homes and support services to 111,000 people. Our care and support arm is one of the largest providers in the Southeast, helping 8,000 people to live a more independent life.

Our mission is to help people make the most of their lives by providing good quality affordable homes, working with communities, and promoting wellbeing. We distinguish ourselves by putting the most vulnerable first, creating great places where people want to live at scale, and building resilience in people and communities. We plan to build 2,500 homes a year by 2021, directly addressing the housing crisis by maximising the number of low-cost rent and shared ownership homes we build.

As well as bricks and mortar, Peabody provides community programmes for the benefit of its residents and for people living in the surrounding neighbourhoods, including employment and training support; health and wellbeing projects; family support programmes; welfare benefits advice; and activities for younger and older people. This work aims to tackle poverty at its roots, supporting people to transform their lives and communities for the better.

**Summary of our response**

- 1.1 We welcome the opportunity to comment on the Mayor's draft London Plan and fully support the Mayor's ambition to deliver more affordable homes, which is one of our organisation's core objectives. We strongly support the 50% affordable housing target.
- 1.2 Moreover, we support the ambitious development targets outlined in the Plan. Nevertheless, we have concerns about how well these targets can be achieved without the right transport infrastructure. Our plans to regenerate Thamesmead are reliant on this infrastructure to unlock housing sites.
- 1.3 While we are generally supportive of the measures in the Draft Plan, we feel that it is overly prescriptive in several places, in a way that may present challenges for our work. Additionally, we are concerned that in some places it contradicts local plans, such as over tenure expectations. It is important we have clarity over which takes precedence where there are contradictions and assurances that this will not create unnecessary delays.
- 1.4 We believe that there should be more co-ordination between local planning authorities and the GLA; some schemes are referred back and forth between the two, creating unnecessary and wasteful delay.
- 1.5 We also believe there should be a more flexible approach to the release of Strategic Industrial Locations (SIL), Metropolitan Open Land (MOL) and the Green Belt. We have extensive SIL and MOL land that we manage, but we cannot optimise these sites because of the restrictive and inflexible approach in the London Plan. The delivery of much needed housing for London, on designated Housing Zone sites, is being delayed due to the new SIL policy position introduced in the Draft Plan. As we have highlighted in previous consultations, the "Green Belt" is also a misnomer that includes land that is neither green nor publicly accessible, including previously developed sites. We believe that strong environmental protections on green and accessible land should be protected, but that there should be a sensitive reappraisal of land that does not meet these criteria.

- 1.6 We are proud to work in partnership with local authorities across London to maximise affordable housing provision. To make this process even more effective, we suggest that the GLA encourages local authorities to give social housing providers a “last opportunity” to price match when land is released.
- 1.7 Peabody’s regeneration of Thamesmead is one of the most significant opportunities to develop new homes in the entirety of London. We believe there is potential for over 20,000 new homes, thousands of jobs, and enormous qualitative benefits. To make this possible we require adequate transport infrastructure: in particular, an extension of the Docklands Light Railway (DLR) from Gallions Reach to Thamesmead. We welcome reference to this in the Draft Plan, but it must be emphasised that this should be a transport infrastructure priority, to the same extent as Crossrail. As it is, references to the extension are somewhat aspirational. We would like greater clarification of the planning and development process, as well as funding mechanisms, to provide assurance and certainty to both Peabody and our partners/stakeholders.
- 1.8 We are also keen to understand whether Local Authority policy will be reflective of the London Plan once adopted. It will be essential to ensure that they are well aligned.
- 1.9 Below we address the core policies affecting Peabody’s work in more detail.

## **Chapter 1: Planning London’s Future (The Good Growth Policies)**

### **Policies GG2 “Making the best use of land” and GG4 “Delivering the homes Londoners need”**

- 2.1 As one of London’s largest developer of affordable housing we support the Draft Plan’s ambition to make optimum use of land and develop high-quality homes that Londoners can afford.
- 2.2 The scale of Thamesmead, where Peabody is the majority landowner, means that it has the potential to make a significant contribution to tackling London’s housing crisis.
- 2.3 We support maximisation of affordable housing provision but the success of the proposed “Fast Track Route” will be dependent on planning departments at borough level being properly resourced to process applications.
- 2.4 We would seek more explicit recognition in the Draft Plan that in areas with existing high levels of affordable / social housing provision, careful consideration should be given to how the tenure mix of new developments can contribute towards creating a more mixed community. For example, Peabody’s development plans present an opportunity to rebalance the currently skewed housing tenure composition across Thamesmead. Through the regeneration we plan to deliver a greater diversity of housing typologies and tenures, with increased proportions of new homes for market sale alongside new low-cost rented homes. This would create greater diversity within communities and more balanced socio-economic profiles than there is currently. This shift will help to place Thamesmead on a more even footing with the rest of London by increasing the overall economic base and creating increased demand for different types of retail, leisure and workspace provision. Existing residents will of course be able to retain their residence in new or refurbished, high-quality homes.
- 2.5 Additionally, we would like to query whether there is not a conflict between the ambition to make optimum use of land, and the Mayor’s public commitment to introduce tenant ballots for regeneration. We consult our residents extensively when undergoing regeneration and work to engage them from an early stage, throughout the process. Without further detail on the Mayor’s intentions it is difficult to comment, but we are concerned that a ballot, as a binary decision made at one point in time, does not capture the nuance of an exceedingly complex set of decisions. Additionally, we worry that the introduction of tenant ballots could put sorely needed new homes at risk, at the expense of future residents. We do not necessarily oppose ballots, but caution should be taken to ensure they do not become a tool to block new affordable homes.

## **Chapter 2: Spatial Development Patterns**

### **Policy SD1 Opportunity Areas**

- 3.1 We support the re-stating of Mayoral commitment to Opportunity Areas, but to capitalise on their potential, we require more than Mayoral support for Opportunity Area Planning Frameworks (OAPFs). There needs to be demonstrable commitment throughout the Mayor's policy programme to enabling and supporting Opportunity Area delivery through a range of measures, including delivering supporting infrastructure, in a pragmatic and realistic manner.
- 3.2 Peabody welcomes the Thamesmead OAPF process and hopes that it will be a key component of a co-ordinated, ambitious response to proactively managing growth and promoting regeneration across Thamesmead. We wholeheartedly support a considered, development led approach that is progressed pragmatically, in terms of land use designations and development forecasts, in the context of Peabody's considerable land ownership across Thamesmead.

### **Thamesmead and Abbey Wood Opportunity Area**

- 3.3 We are delighted that the Draft Plan recognises our comprehensive regeneration of Thamesmead and our long-term commitment to its residents, existing and future. We support the priority attached to the development of Opportunity Areas such as Thamesmead.
- 3.4 Peabody's role as major landowner and developer in Thamesmead means that we are in a unique position to realise Thamesmead's huge potential and enable it to become London's New Town. We look forward to continuing the positive partnership-work already underway with the Greater London Authority, Transport for London, London Borough of Bexley and the Royal Borough of Greenwich to help deliver our shared vision for Thamesmead.
- 3.5 We do, however, think that the Draft Plan underestimates Thamesmead's potential. We believe Thamesmead has potential to deliver at least 20,000 new homes for London, complemented by the creation of thousands of new jobs, and a unique cultural and commercial offer. However, this potential will only be fulfilled with the provision of new public transport infrastructure, in particular an extension of the Docklands Light Railway from Gallions Reach to Thamesmead. The DLR would significantly improve the accessibility of new and existing residents, whilst also enabling the development of Thamesmead Waterfront, a regionally significant growth opportunity offering the potential to deliver a new riverside community for London and a revitalised Town Centre for Thamesmead.

### **Thames Estuary**

- 3.6 We are heartened that the Draft Plan notes that 'The Mayor has prioritised schemes to unlock / connect growth areas.' Improving cross-river connectivity will help to unlock growth as the Thames, particularly in the east, presents a significant barrier to easy movement.
- 3.7 Thamesmead has scale, location and significant potential in its own right and as a catalyst for change throughout the south-east London region and the Thames Estuary Growth Corridor. Peabody, working in partnership with TfL, the GLA, boroughs and others, is confident that Thamesmead can fulfil its considerable potential in fuelling growth throughout the region. Our work will support the creation and growth of high value industry and employment opportunities whilst also trialling new technologies and harnessing innovation to create sustainable and resilient communities.
- 3.8 Thamesmead is establishing its own identity as a vibrant new town for London with culture at its heart with the important opportunity to contribute to London as a world leading city for culture. Ensuring that arts, culture and heritage are woven through our plans will help us to design exemplary new homes and meaningfully engage with new and existing communities. It will also bring creative skills and opportunities for those living and working in Thamesmead and contribute to creative clustering through the Thames Estuary area.

## **Chapter 3: Design**

### **Policy D6 Optimising housing density**

- 4.1 We welcome the Mayor's ambition to increase density and make optimum use of land as this will be key to addressing housing need in London. We do not oppose the removal of the density matrices. However, we do query whether the Draft Plan's policies are strong enough to encourage building at higher densities. In fact, in many places the Draft Plan seems to contradict itself by placing an emphasis on buildings that match "local context", or additional restrictions on regeneration opportunities, while requiring high density. We echo London First's concerns that the Draft Plan does not include sufficient safeguards to prevent conservatively low densities.
- 4.2 We would like assurances that the design-led approach will not be overly complex or focused on minor details, resulting in delays during the pre-application process – especially given that "the higher the density of a development, the greater the level of scrutiny that is required of its design".

### **Policy D11 Fire safety**

- 4.3 We support these proposals to ensure that fire safety is prioritised in new developments.

## **Chapter 4: Housing**

### **Policy H1 Increasing housing supply**

- 5.1 It is positive to see ambitious building targets in the Plan.
- 5.2 We would welcome greater clarity around Paragraph E "Where new sustainable transport infrastructure is planned, boroughs should re-evaluate the appropriateness of land use designations...". For example, does this mean that in areas where significant new public transport links are planned and where connectivity will increase markedly, boroughs are endowed with the ability to reassess designations such as SIL and MOL? If this is the case, what is the process through which this should occur (Local Development Plan Review, an OAPF process, or other)?

### **Policy H4 Meanwhile use**

- 5.3 Meanwhile Use can be an excellent way to make use of land in a way that benefits the community while land awaits development. We are proud to collaborate with Mercato Metropolitano, the popular Italian food market on a Peabody-owned site near Borough. We support the guidance for boroughs to identify opportunities for such uses.
- 5.4 However, it must be ensured that these meanwhile uses do not later prevent development. Peabody has one site where we are developing a school; the garden was offered as a community garden for Meanwhile Use. Some local campaigners are now attempting to stop the development, which consists of 50% affordable housing. This is unacceptable given local need for these homes and the charitable nature of the temporary agreement.
- 5.5 We also suggest that Meanwhile Use can serve as an excellent opportunity for boroughs and other landowners to establish a network of temporary stopping places, or transit sites, for Gypsies and Travellers. This would serve the dual purpose of addressing the shortage of appropriate sites for a vulnerable group in housing need, and reducing the impact of unauthorised encampments on the local communities.

### **Policy H6 Threshold approach to applications**

- 5.6 As detailed in our response to the Affordable Housing Supplementary Planning Guidance, we support the use of a threshold approach. Increasing the supply of affordable housing is one of our strategic goals and proposals to reduce the level of information required from developers who commit to a higher proportion of affordable homes is welcome, particularly an exemption from the need to submit viability information for schemes which deliver above 35%. We believe developers will soon start to actively consider this new approach in their assessment of bids for land and applications for planning.
- 5.7 We also welcome the inclusion of Build to Rent to the Fast Track Route, presuming they meet the affordability requirements.
- 5.8 While we do not necessarily oppose the proposal to permit greater flexibility in viability assessments Opportunity Areas, we are considered that this could have a negative impact as uncertainty can lead to higher land prices.

### **Policy H7 Affordable housing tenure**

- 5.9 We welcome the Mayor's work to ensure rents are linked to local incomes and the clarity this provides. In our experience, some boroughs are attempting to drive rents below this position through the planning process. As an organisation which has historically worked to keep rents as low as possible while still maintaining a significant development programme, we do understand the importance of low rents. However, recent research conducted by Capital Economics has suggested that tenants London and the Southeast can sustain higher rents and in doing so, support the development of more sorely needed social homes. The national 1% rent reduction policy has reduced our ability to develop low-cost rented homes, at the expense of low-income families trapped in the expensive private rented sector, as well as the long-term Housing Benefit bill. It is thus important that rent policy in London is consistent and does not prioritise short-term reductions in rents over the long-term output of low-cost rented units.
- 5.10 Regarding point 4.7.9 "For dwellings to be considered affordable, annual housing costs... should be no greater than 40 per cent of net household income", while this is a good aspiration, there is a clash with high value areas. Shared ownership can become unviable. We suggest a tier system for different value areas, and a phased introduction. We have sites currently owned that are assessed on different criteria and this affects the viability of those schemes.

### **Policy H10 Redevelopment of existing housing and estate regeneration**

- 5.11 We are participating in a joint response with the g15 which will address the Mayor's policy on regeneration in more detail.
- 5.12 As an organisation whose primary development goal is to maximise provision of low-cost affordable rented homes, we recognise the Mayor's concern that regeneration should not result in lower levels of affordable housing.
- 5.13 We are going ahead with two successful regeneration schemes at Parkside (Lewisham) and St John's Hill (Wandsworth). Both of these will improve the quality of the homes as well as significantly increasing the number of units. In the future we are concerned that schemes like this would be too difficult and lengthy to progress. The housing market is getting increasingly difficult to operate in, especially for market sale which funds our affordable rented homes. Additional delays could prevent these schemes from happening.
- 5.14 However, we have concerns that the Draft Plan is overly prescriptive in its requirements and does not allow sufficient flexibility to address the needs of current and future residents. Once again we would like to draw attention to the conflict between policies that explicitly prioritise increased density and optimum use of land, and policies that make doing so increasingly challenging or even unviable. It should be clearer which takes precedence out of intensification or these policies.

## **Policy H12 Housing size mix**

5.15 We welcome the flexibility to bring forward a range of different sized units.

## **Policy H16 Gypsy and Traveller accommodation**

5.16 We welcome the recognition that Gypsy and Traveller accommodation is included in the Plan and especially welcome the proposed 'cultural' definition when assessing local need. We would encourage boroughs to consider a range of new accommodation for Gypsies and Travellers including Group Housing which may be compatible with other new housing developments.

## **Chapter 6: Economy**

### **Policy E5: Strategic Industrial Locations (SIL)**

- 6.1 Most of the land across Thamesmead that is designated as SIL is within Peabody's ownership. This means we are well positioned to either proactively manage the strategic release of industrial land for new, high quality mixed use development or, if required, offset net loss of SIL floorspace through re-provision across our wider portfolio.
- 6.2 Much of Thamesmead's current industrial floorspace provision is relatively low quality, reflecting Thamesmead's current role as a base for low value industrial, storage and distribution uses and waste/utilities. This is associated with the dominance of 'bad neighbour' uses, which do not create an encouraging perception from a residential or commercial perspective.
- 6.3 Areas with significant amounts of land designated as SIL are frequently those which the Draft Plan designates as Opportunity Areas or Strategic Areas for Regeneration (Policy SD10). Policy SD10 states that "Development Plans, Opportunity Area Planning Frameworks and development proposals should contribute to regeneration by tackling spatial inequalities and the environmental, economic and social barriers that affect the lives of people in the area, especially in Strategic and Local Areas for Regeneration."
- 6.4 However, the Draft Plan's current policy towards SIL does little to support holistic, whole placed approaches to regeneration. In Thamesmead the delivery of designated Housing Zone sites capable of providing significant numbers of new homes – many affordable – is being delayed due to challenges with inflexible approaches to the application of SIL policy stemming from the Draft Plan's policy. There will need to be nuance and pragmatism in the application of SIL policy if areas such as Thamesmead are to attract innovative, higher value industrial uses to facilitate job creation and progression to more valuable jobs. Innovative design solutions addressing the co-location of residential and industrial uses are emerging yet any application to test their success is prohibited by current policy.
- 6.5 A more nuanced, context-specific conversation is needed around SIL designations, their purpose and usage. We would suggest that the Thamesmead OAPF process presents an exemplary opportunity to assess the release of SIL across Thamesmead, given that it entails developing a strategic, evidence based framework for development across Thamesmead and includes all major stakeholders.

### **Policy E11: Skills and opportunities for all**

6.6 We support the Mayor's ambition to increase skills. Peabody is working with partners in the London Borough of Bexley and London South East Colleges to deliver the Place and Making Institute, a world-leading learning, research, innovation and enterprise campus dedicated to place-making and design skills. We look forward to exploring this further with colleagues in the Greater London Authority.

## **Chapter 8: Green Infrastructure and Natural Environment**

### **Policy G3 Metropolitan Open Land**

- 7.1 With five lakes, 7km of waterways and over 150 hectares of open space, Thamesmead's abundance of green and blue space is one of its strongest assets.
- 7.2 However, due to poor design and a history of underinvestment, some of the green and blue spaces in the area are under-utilised, playing little significant role in facilitating leisure or recreation and failing to serve the needs of Thamesmead communities as well they might. The Draft Plan's approach to green spaces of all kinds needs to be both comprehensive and holistic, considering how green infrastructure can contribute to multiple aims, such as health and wellbeing, climate change mitigation, education and play.
- 7.3 A significant proportion of Thamesmead is currently designated as Metropolitan Open Land (MOL), yet much of this land is currently inaccessible to the public, possessing little qualitative value and serving little value despite the designation. The blanket application of an approach whereby any loss of Metropolitan Open Land must be off-set by equal re-provision elsewhere, with no consideration as to the qualitative value of provision, will impinge upon Thamesmead's potential to create new jobs and contribute towards solving London's housing crisis. In Thamesmead in particular, but across London as a whole, the Draft Plan's policy on MOL seems to sit awkwardly alongside the stated aim of maximising housing delivery.
- 7.4 As part of the review of Thamesmead's green and blue spaces, to ensure that the future landscape of Thamesmead becomes the high quality, safe, well managed, integrated, well used and multi-functional place it should be, there will need to be discussion around, as well as challenges to, the MOL designation. To truly reach its potential, there will need to be a careful balance between development and green space across Thamesmead, and it is quite possible that the carefully considered release of MOL for development will play a part in this. There may also be scenarios that suggest the redistribution or re-designation of MOL within Thamesmead to improve connectivity, access or use, for example. The OAPF process is critical in this process and should support the opportunity that Thamesmead presents.

## **Chapter 9: Sustainable Infrastructure**

### **Policy SI3 Energy Infrastructure**

- 8.1 Peabody seeks to develop quality homes with high environmental standards. We are currently undertaking research into communal heating systems, their efficiency, and how they impact our tenants in practice. There is a need to review the effectiveness and sustainability outcomes of large scale heating schemes. In particular, there is need for greater and more robust evidence to understand whether the increased provision of non-fossil fuel electricity is truly offset by a reduction in running and hence use of fossil fuel. It is important to ascertain whether residents simply pay more for an ideal rather than a fact. Given the often substantial cost and the lack of evidence of the benefits, we do not believe that there should be a requirement in Heat Network Priority Areas to use communal heating systems. There should be scope for flexibility in individual appraisals.

## **Chapter 10: Transport**

### **Policy T1 Strategic approach to transport**

- 9.1 Thamesmead has suffered from inconsistent investment and management and still suffers from poor connectivity and accessibility, exacerbated by a historic lack of transport infrastructure investment in

comparison to other areas of London. This poor provision of transport infrastructure has constrained the development potential and the vitality of existing communities and employment areas.

- 9.2 The use of transport infrastructure to drive growth across London is well established, as recognised within the Draft Plan, and the arrival of the Elizabeth Line to Abbey Wood in 2018 will be transformative for South Thamesmead and Abbey Wood. The increase in public transport accessibility will ensure that the positive development and regeneration of these key areas already underway will continue apace.
- 9.3 Nonetheless, transport infrastructure is still lacking across much of north and central Thamesmead. Of paramount importance for the existing communities in these areas will be improving connectivity to Abbey Wood station in order to maximise the positive impact of the Elizabeth Line's arrival. Therefore, alongside improvements to existing bus routes and the provision of new ones, we would particularly welcome the introduction of new rapid transport corridors to improve accessibility and provide better linkages to both established and future public transport nodes. In addition to facilitating new growth, this would be transformative for existing communities.
- 9.4 The DLR extension from Gallions Reach to Thamesmead will support the comprehensive development of sites in north and central Thamesmead, enhancing deliverability and improving residents' access to employment opportunities in key growth locations. In particular, the DLR extension to Thamesmead will facilitate the delivery of the Thamesmead Waterfront development opportunity. With the potential for 11,500 new homes, 1m square feet of commercial space and a new town centre for Thamesmead centred around a new DLR station, this is a regionally significant development opportunity.
- 9.5 Clearly, ongoing investment in London's transport infrastructure will support housing and employment growth in London, particularly in key opportunity areas such as Thamesmead. Whilst we welcome reference to the DLR extension in the draft London Plan, clarification of the planning and development process, as well as funding mechanisms, would provide assurance and certainty to both Peabody and our partners/stakeholders.

### **Policy T3 Transport capacity, connectivity and safeguarding**

- 9.6 We support the longer-term extension of the Elizabeth line into Bexley and north Kent, as this would increase Thamesmead's connectivity to the east and the rest of the Thames Estuary strategic corridor, in addition to improving rail connectivity across the wider south east more widely.
- 9.7 Thamesmead has a high proportion of car usage, in part due to its relatively poor public transport connections but also due to the nature of the public realm and street structure, the strategic highway network and railway lines which create severance.
- 9.8 We support the aim of reducing the number of journeys made by car. We want Thamesmead to be one of London's most sustainable urban living environments; a key component of achieving this will be encouraging a greater proportion of trips to be made by walking and cycling. Accordingly, we are investing heavily in public realm improvements and improvements to the road network across Thamesmead to prioritise buses, cyclists and pedestrians, contributing towards the 'Healthy Streets' agenda.
- 9.9 The scale and blank-slate nature of the Thamesmead Waterfront development opportunity means that as the master-planning process progresses we will be well positioned to embed the draft Plan's commitments and principles to good growth throughout; facilities and services would be integrated into a truly accessible and high quality public realm, encouraging walking and cycling, with a DLR station at the heart of the new development.
- 9.10 Indeed, the extension of the DLR to Thamesmead Waterfront would embody the very definition of 'good growth'; facilitating the provision of more employment opportunities, enabling the delivery of a significant amount of affordable homes and improving the quality of life in a place where people enjoy living and working in good health.
- 9.11 As work to assess potential DLR routing options is ongoing, we would expect any land use plans developed for Thamesmead to retain sufficient flexibility to respond most effectively to the outcomes of this work.



9.12 We fully support the promotion of higher density development at sites benefitting from good public transport links. In this vein, to enable the development potential unlocked by the DLR extension to be fully exploited, and in accordance with the Draft Plan's emphasis on making the best use of land, we would expect to see high residential densities promoted in the areas best served by a new DLR extension.

**Policy T9 Funding transport infrastructure through planning**

9.13 In the midst of London's housing crisis, we believe that all planning obligations should include affordable housing provision.

9.14 Where financial contributions such as Mayoral Community Infrastructure Levy are charged, we strongly believe that these should be used towards essential strategic infrastructure. In the same way as MCIL was used towards the Elizabeth Line, we believe policy should specifically refer to the DLR Extension, recognising that this is a top priority at the same level as the Crossrail.

**For more information please contact:**

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