

JD/RS/P6406
1st March 2018

Sadiq Kahn (Mayor of London)
New London Plan
GLA City Hall
London Plan Team
London
SE1 2AA

Dear Sir,

**Representations on Draft London Plan on behalf of Roca Investments
Section 335 of the Greater London Authority Act 1999**

We write on behalf of our client, Roca Investments, to make representations on the draft London Plan. We welcome this review of strategic planning policy and see this as an invaluable opportunity to ensure that the London Plan facilitates the delivery of the Mayor's target of 66,000 new homes per annum. However we are concerned that some of the drafting may inhibit the very growth in housing which the plan seeks to gain specifically in key regeneration and opportunity areas identified for significant housing growth.

ROCA's key business is the provision of mixed use schemes which incorporate both commercial (SME) workspace and residential. ROCA have sites in Islington, LLDC, Southwark, Lambeth and Hackney as well as a successful business centre in Waltham Abbey and projects in the east of England. As a consequence ROCA are well able and qualified to comment on the practical delivery of mixed use developments and how to ensure SME flexible and affordable business space can be delivered, managed and create opportunities for businesses to prosper alongside residential homes. ROCA are working with local authorities outside London to make better use of redundant or underused industrial sites, bringing employment, residential and in some cases revenue for the Council from these sites.

Policy H1 - Increasing Housing Supply:

The policy supports the intensification of development on accessible sites close to town centres or transport hubs, encouraging new homes to be delivered at higher density at transport hubs and encouragement towards the use of Brownfield registers and presumption in principle.

ROCA strongly supports the Mayor's approach to encouraging more homes to be built across London. The target of 66,000 homes per annum is ambitious

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Policy H2 - Small Sites.

The Mayor's intention is to provide around 40% of London's homes on small sites (schemes of less than 25 units or below 0.25ha) principally located in the outer London boroughs.

We consider the threshold of 25 units will result in developers submitting lower density schemes to benefit from the presumption in favour whilst reducing their exposure to providing affordable housing within their schemes. Furthermore we can foresee LPA's supporting lower density schemes as these may be less contentious locally. This will result in fewer homes being delivered, impacting on the Mayor's target of 66,000 homes per annum.

It would be better if the threshold of 25 units is removed from Policy H2 and the size criterion of 0.25ha is retained as the threshold to define what constitutes a small site. This will allow delivery of higher density schemes which will maximise the use of brownfield land and for which there will be a presumption in favour of development.

Draft Policy E5 Strategic Industrial Locations (SIL)

Whilst we note the importance of SIL in supporting strategic logistics operations serving the capital we consider a more site specific localised approach should be applied when determining applications such as residential-led mixed use schemes located within SIL

ROCA have sites that are of low-grade former industrial sites which has little prospect of being redeveloped for a solely employment use or industrial use –these in some cases have Class B1a lawful uses. The character of these sites epitomises the shift in employment space comprising post-war low-scale and low-grade industrial buildings which have shifted away from traditional industry towards the arts, small scale B1 uses.

We consider that adopting a strategic plan-led approach to SIL release does not take into account the specific characteristics in relation to the ever evolving character of industrial/ commercial areas, shifts in the market, the constant strive to create mixed-use sustainable locations and the characteristics of the existing buildings and structures on the site. As such, whilst we appreciate a need to retain industrial floorspace, we consider this restrictive approach to SIL designation is counterproductive to the strategic aspirations of the London Plan and the local aspirations of the Boroughs, particularly where sites are clearly redundant or can deliver more appropriate employment, intensive and housing opportunities as part of co-location mixed use schemes.

Draft Policy E4 - Protection of Industrial Land

The draft London Plan goes further than the current plan in protecting against loss of industrial land, with a principle of 'no net loss' of industrial floorspace capacity. In the case of Southwark; the borough has, alongside its adjacent neighbours been identified to 'retain capacity'. However, the delivery of the Bakerloo Line Extension and its associated benefits is predicated on the redevelopment of the area for new homes in accordance with the aspirations of the Boroughs AAP.

Poor quality industrial sites such as some located within the Bermondsey / Old Kent Road / Surrey Canal Area SIL offer the greatest opportunity to deliver mixed use development schemes in sustainable locations on brownfield land; accordingly this will allow London to grow without impacting on the Metropolitan Green Belt. We are concerned that the protection of industrial land in locations

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such as Southwark through a blanket no net loss of industrial floorspace is inflexible and will hinder the delivery of mixed developments.

The draft wording of Policy E4 suggests that the opportunity for the release of such sites for other uses may not be appropriate, despite these sites potentially having no further use as an industrial function. Part C of Policy E4 states that the retention and provision of industrial capacity across all types of industrial land should be planned, monitored and managed in accordance with the London wide management of floorspace capacity which is based on individual Local Planning Authorities (LPAs). This does not take into consideration site-by-site factors such as the ever evolving character of the area, shifts in the market, the constant strive to create mixed-use sustainable locations and the characteristics of the existing buildings and structures on the site.

Only 3 out of the 35 LPAs within London have been identified as suitable for 'Limited Release' of industrial land. Accordingly, this indicates that the release of industrial land for intensification, co-location or substitution in accordance with Policy E7 will be difficult to achieve outside of these boroughs. We therefore consider clarity should be provided in respect to the practical application of intensification and co-location policies on a strategic London-wide level.

Policy E7 – Intensification and Co-Location

Roca supports the Mayor's recognition of the ability of industrial uses to be 'co-located' or mixed with residential through intensification. Policy E7 states that intensification of SIL and LSIS should only be considered on sites that have been specifically identified through a plan-led process or as part of a co-ordinated masterplanning process. This conflicts with the wording of policy E4 which indicates that the release of industrial land to other uses should be confined to those LPAs as outlined in draft policy E4 and intensification and co-location can only take place in those boroughs identified for 'limited release'.

We consider the wording of the employment policies within the draft London Plan are potentially restrictive and detrimental to the delivery of much needed and increased housing targets for London, where sites are wholly capable of delivering both as part of co-location and mixed use. Whilst we welcome the promotion of intensification and co-location we consider the ambiguity around the designation of such areas restrictive which do not fully take into consideration matters which are site-specific.

Policy D4 - Housing Quality and Standards

Policy D4 relates to housing quality and standards. There is far greater prescription in the draft London Plan than previous London Plans with more of the design standards previously contained in supplementary guidance in the Mayor's Housing SPG (both 2012 and 2016) now installed into the London Plan.

Policy D4 is considered to be too detailed and specific for a Spatial Strategy and the wording too prescriptive. The policy should be simplified by removal of all of the standards and replacement with a cross reference to the relevant section and detailed guidance of the adopted Housing SPG 2016 (Section 2) or any future replacement document. Reference should also be made to the National Technical Standards.

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CIL Discretionary Social Housing Relief

ROCA is committed to delivering mixed use schemes and open to opportunities to delivering alternative housing models. Mixed use schemes are required to deliver substantial affordable housing and attract significant CIL contributions.

Often schemes unable to deliver the policy target of 35% are penalised, without full consideration of the potential for sites that also generate CIL and employment opportunities to be truly recognised. We know London has a housing crisis – but the delivery of housing cannot be at the cost of employment, social and community infrastructure which are all important to creating a balanced and sustainable community.

Discretionary Social Housing Relief

The Mayor is asked to consider the use of Discretionary Social Housing Relief (DSHR) to encourage more innovative affordable housing models to come forward and help deliver more housing. . At present due to the wording of the CIL Regulations only social and affordable rented housing, intermediate rented housing and shared ownership housing benefit from mandatory SHR. There are very few examples where a Borough has enacted DSHR.. This adds significant cost to developers wanting to deliver other forms of genuinely affordable homes for young people, single households and older household requirements. Smaller households are often better suited to be delivered as part of mixed use sites (particular smaller sites).

We would welcome the Mayor leading by example and enact DSHR on Mayoral CIL. This would encourage and incentivise boroughs to do the same. This would potentially deliver more housing and jobs and contribute to infrastructure via CIL.

Conclusion

We trust that Roca's comments within this representation, including the suggested amendments to the Plan, will be taken into consideration as part of the formulation of the new London Plan. We would welcome the opportunity to discuss in further detail if required.

Should you have any queries, please do not hesitate to contact me on the details undersigned.

Yours sincerely



For and on behalf of
Rolfe Judd Planning Limited

Cc Roca Investment