

Southern Housing Group comments

Page: [Policy GG6 Increasing efficiency and resilience](#)

Section: [GG6](#)

Southern Housing Group supports the GLA's objective to help London become more efficient & resilient. The Plan will support us to achieve our own ambitions in this area.

Page: [Policy SD1 Opportunity Areas](#)

Section: [SD1](#)

We agree with the Plan's approach to Spatial Planning, however we are concerned that it may be in conflict with other Plan policies. Some of the broader objectives might not be deliverable if they are hindered by micro management. We advocate for a degree of flexibility with some policies within growth corridors, in order to ensure that delivery is not hampered unnecessarily. In particular, we believe that some lower quality green belt & small industrial sites might be released for affordable housing development, where they are well served with local infrastructure and adjacent to transport hubs.

Page: [Policy SD2 Collaboration in the Wider South East](#)

Section: [SD2](#)

We fully support this policy

Page: [Policy D4 Housing quality and standards](#)

Section: [D4](#)

The group Fully supports these policies, however we would encourage the GLA to ensure that design policies are enforced equally across all tenures.

Page: [Policy D6 Optimising housing density](#)

Section: [D6](#)

We support the objective of maximising density, and the delivery of high density housing schemes, where appropriate. Evidence suggests that really high density housing works better when it is provided for the higher value market, and when design is really excellent. We would draw the Authority's attention to existing design guidelines for high density housing, such as 'Superdensity' by Design for London. The higher the density of the housing, the more important the detailed design becomes, both of private and communal spaces; homes need to be spacious, with plenty of natural light and excellent ventilation.

It is also important to carefully consider the amount of affordable housing provision in high density developments. In general, a mixture of forms would be desirable on both aesthetic and practical fronts- Families should not normally be housed on higher floors, as they are most in need of outdoor amenity space. Also, very high buildings tend to be more costly to run, so the relationship with service charges needs to be carefully considered, particularly where affordable housing is included in the scheme.

High density housing is spatially sustainable, however, whilst medium density developments use less energy per person, super dense developments, particularly tall buildings, can use more energy per person to run the building, due to increased demand from heating, cooling, ventilation etc. from higher buildings. Larger buildings are also more vulnerable to overheating problems, so there is a need to carry out detailed daylighting and overheating assessments on these schemes.

Page: [Policy D11 Fire safety](#)

Section: [D11](#)

The Group fully supports this policy

Page: [Policy H2 Small sites](#)

Section: [H2](#)

Southern Housing Group supports policy H2 and any initiative that will help release small sites for development. We have extensive experience of delivering housing on small infill sites, particularly on our own estates. Our learning from these is that design needs to be excellent in order to avoid impacting on the amenity of both the existing and new housing on the site. Particular attention must be given to daylight & sunlight, and to addressing neighbours' concerns from the outset, as objections can cause considerable delay to projects. We welcome any initiative that helps to clarify and accelerate the planning process on small sites, as this inevitably enhances viability and thereby delivery.

Page: [Policy H7 Affordable housing tenure](#)

Section: [H7](#)

As an affordable housing provider, the Group strongly supports any initiative that will lead to the delivery of more affordable housing. As a developer, we know that certainty about policy requirements is crucial to land value calculations, so we encourage the GLA to provide clear policy guidance to Local Authorities, so as to minimise differences in approach.

Page: [Policy H13 Build to Rent](#)

Section: [H13](#)

Whilst there is certainly value to be captured from land used for build to rent, we do not agree to mixing a market rent model with other tenures within a single core, so, unless the site allows for separate cores, we would suggest that any affordable provision might be provided off site or as a commuted sum.

Page: [Policy H17 Purpose-built student accommodation](#)

Section: [H17](#)

Neutral -

Whilst there is some value to be captured from land used for student accommodation, we do not agree that a standard affordable quota should be applied, unless the site allows for separate cores, as it is not generally desirable to mix student accommodation with other uses. We would suggest that, in such circumstances, any affordable provision might be provided off site or as a commuted sum.

Page: [Policy H18 Large-scale purpose-built shared living](#)

Section: [H18](#)

Support -

The group supports the provision of co-living schemes, as long as they are in the right location, with sustainable management plans and clearly identified demand.

Page: [Policy E1 Offices](#)

Section: [E1](#)

We support this policy. Provision of good quality, affordable office space is crucial to the delivery of sustainable communities.

Page: [Policy E4 Land for industry, logistics and services to support London's economic function](#)

Section: [E4](#)

The Group supports the provision of a suitable mix of industrial sites, however we believe that some industrial sites could be released for affordable housing provision in locations with good local infrastructure.

Page: [Policy G2 London's Green Belt](#)

Section: [G2](#)

The Group supports policy G2A, with regards to the improvement of existing green belt, however we do not support G2B. We do not agree that de-designation of the greenbelt should be avoided in all cases, and we strongly believe that this policy is in conflict with the Mayor's intention to maximise housing supply and intensify land use. There is a considerable amount of 'grey belt' in the outer London boroughs, much of which is providing no real amenity, and is well served for transport and local infrastructure. We are not suggesting that this land should be used for high density developments, however we believe that much of this land could be brought into use by a combination of new housing and new amenity provision. If such sites were to be de-designated in a sensitive manner, developers could provide some new housing on a percentage of the site, whilst also implementing policy G2A and improving the remainder of the site, to be retained as green belt.

Page: [Policy G5 Urban greening](#)

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The London Plan focus on urban greening is reflected by the recent introduction of biodiversity and estate care in Southern Housing Group's new Environmental Sustainability strategy to encourage the development and use of green spaces, promote indigenous species, support biodiversity at our new sites as well as how we adapt to climate change in regards to cooling and flooding, especially important in the urban heat island of London.

The Urban Green Factor methodology provides a clear, practical framework for how this will be analysed and prepared for Mayor developments and is welcomed by Southern Housing Group.

Page: [Policy SI1 Improving air quality](#)

Section: [SI1](#)

Air Quality is a major issue for people that live in London – therefore from a liveability and design perspective Southern Housing Group is supportive of this initiative as it seeks to achieve and minimise the impacts of Air Quality on people that live in London.

Page: [Policy SI2 Minimising greenhouse gas emissions](#)

Section: [SI2](#)

Southern Housing Group welcome the gradual improvements and journey towards zero carbon as this will allow time for the industry to develop products and techniques, combined with the learning from comprehensive monitoring to meet this ambition over time in the most cost effective manner, avoiding any massive step changes in expected standards of zero carbon delivery.

Flexibility within carbon offset funds for Housing Associations should be encouraged and incorporated as this will allow retrofit improvements in the older, existing and less energy efficient stock within the same or neighbouring boroughs. Providing additionality and accountability, this will save administration and management costs being incurred and this reducing the overall pot of money in the carbon offset fund for retrofit activities.

Southern Housing Group supports the introduction of a requirement to monitor and report on energy performance and has recently introduced a Post Occupancy Evaluation (POE) target to its Environmental Sustainability Strategy in response to the performance gap between design versus as built standard as well as the desire to create a learning feedback loop to our new build energy standards.

However, monitoring and reporting for 5 years will create a significant and ongoing resource implication for new developments – costs that will need to be factored in to the viability of a new build scheme. For this reason a balance needs to be struck in terms of learning and identifying good practice versus resource implications, therefore we would advocate a shorter monitoring period of 2-3 years and only at a certain percentage of properties, especially those of similar construction within the same building fabric.

Page: [Policy SI3 Energy Infrastructure](#)

Section: [SI3](#)

Over the last 10 years, Southern Housing Group has developed over 1000 residential properties with communal heating and has significant in-use experience of residential property on communal and district heating systems. In reality, communal heating systems without a low carbon heat source (i.e. gas boilers) increase carbon emissions due to losses and inherent inefficiencies in the system compared to individual heating systems. Therefore the GLA needs to be aware that the continued development of these schemes with no low carbon heat sources (in reality we 2 out of 10 schemes with low carbon heat sources) actually increases carbon emissions, as well as local emissions.

In addition to the environmental non gain, communal heating systems are not as cost beneficial to residents as individual systems due to the high losses and inefficiencies experienced and also have questionable reliability where a large number of properties can be left without heat and hot water due a number of external risks.

Therefore, to help improve standards in the design, specification & delivery of communal heating SHG welcomes the requirement and support for CIBSE CP1 Heat Networks: Code of Practice for the UK.

The Heat Trust standard has been developed for large heat suppliers and is a welcome development for customer protection in this currently non-regulated industry. However the requirements in the Heat Trust are currently too onerous and present too much risk for Housing Associations and Local Authorities to sign up to – however these organisation offer consumer protection in other ways and are looking to develop a version that is applicable to this type of organisation. Therefore consideration and caution needs to be given to the application of the Heat Trust requirements based on the size of scheme and operator.

Page: [Policy SI4 Managing heat risk](#)

Section: [SI4](#)

Southern Housing Group welcomes these proposals as we have experienced recent developments that have suffered from overheating, with sustained internal temperatures of over 30 degrees that have required expensive and awkward remedial works. It is worth noting that most of the experienced overheating has been on schemes with communal heating, where high heat loads, over-specification of communal systems combined with high levels of insulation have led to build up of internal temperatures. Therefore this policy needs to be considered in conjunction with SI3 requirements for communal heating systems and examine ways to improve the efficiency and delivery of communal heat to avoid overheating risk in such developments.

Page: [Policy SI5 Water infrastructure](#)

Section: [SI5](#)

From a policy perspective Southern Housing Group is supportive of this policy objective as it represents an achievable, pragmatic approach to achieving water conservation and is in line with our current approach. The improvements in BREEAM ratings aligns with the targets and approach in our Sustainable Workplaces Strategy and Carbon reduction aims.

Page: [Policy SI7 Reducing waste and supporting the circular economy](#)

Section: [SI7](#)

Southern Housing Group is supportive of the increase in recycling targets for construction, demolition and excavation waste and has already committed to this in its new Environmental Sustainability strategy and will be a requirement on all new build projects.

Page: [Policy T5 Cycling](#)

Section: [T5](#)

Southern Housing Group is supportive of this increase in cycle storage provision in areas of high demand both in terms of supporting low carbon methods of transport (Environmental Sustainability Policy) and from a practical point of view as often bikes are stored in communal areas or carried up to flats/balconies – presenting a health and safety risk as well as increase wear & tear in communal areas.