

Mayor of London
New London Plan
GLA City Hall
London Plan Team
Post Point 18
FREEPOST RTJC-XBZZ-GJKZ
London SE1 2AA
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Email: LondonPlan@london.gov.uk

Dear Mayor

Re: Draft London Plan

Urbanissta is a planning consultancy located in Kings Cross, we represent several housebuilders and developers within London and the Home counties. We would like to make comments on the Replacement London Plan.

Identified Need

The replacement London Plan sets a housing requirement for 65,000 dwellings per annum up to 2029 which is supported as it is higher than the current London Plan figure of 40,000 and shows that the need to address housing shortages is being taken seriously. This figure however is still lower than the full objectively assessed need of 72,000 dwellings per annum (capped) and 100,000 (uncapped) that is identified within the Governments standard method of OAN as identified within the Right Homes in the Right Places document.

The Plan should identify that the full OAN is 100,000 dpa to identify the significant housing need within the City as the figure of 65,000 dpa masks the true extent of housing requirement within the City, as well as aligning with the approach to housing within England.

Paragraphs 0.0.21 and 0.0.22 suggest that upon adoption of the draft London Plan, the draft housing targets listed in table 4.1 will automatically update the existing housing targets of the London LPAs. They will not need, by implication, to produce supporting Part 1 Local Plans. The testing of the ability of the London LPAs to accommodate the London Plan targets should be subject to a more detailed assessment of locally assessed OAN and land supply.

The Plan sees the housing requirement increased by approximately 22,000 dwellings since the FALP document of 2016, with the highest increases in suburban authorities such as Barking & Dagenham, Brent, Croydon, Enfield Ealing, and Hounslow along with Newham, and that all these units will be met within the London boundaries.

Several the Boroughs identified above have Green Belt constraints and it is considered unreasonable for a Local Authority to have a significantly greater housing requirement without being allowed to consider all options for delivery of these units, including options for releasing suitable Green Belt sites. High density development cannot be considered suitable for all sites and as such alternative options for meeting the increased housing requirement should be assessed by each Authority. These are matters that can be assessed through Local Plans.

Delivery

Whilst the OAN for the whole of London should be 100,000, there remains queries regarding whether the 65,000 dwellings can be delivered as set out in the HBF's detailed representations.

The SHLAA identifies 65,000 dwellings to be delivered within the first 10-year period of the plan on a set of assumptions regarding increasing capacity on existing Opportunity Areas and a significant amount of delivery from small sites.

The London SHLAA is made up of sites identified from:

- London Development Database
- Call for Sites
- SHLAA 2013 updates
- GLA Capacity studies
- Land Use Data

- Added by the LPA

The SHLAA does not identify specific sites, and applies a theoretical approach to the rates of delivery on small sites. A SHLAA prepared by a local Borough would not include small sites of less than 5 units as these would be categorised as windfalls. The SHLAA uses windfalls and small sites and as such there may be double counting of the rates at which small sites can support delivery.

There is a reliance on small sites coming forward which is a step change in London Plan policy. The approach to small sites capacity is undertaken through a standard methodology rather than considering site specific capacity in which an Authority would do within their own SHLAA. The SHLAA identifies that much of land within the wider London area is owned by the Local Authority. The Plan which is prepared on the basis that all sites coming forward at the numbers identified, should address how the Local Authority owned sites will be released for development.

Relationship with the London Boroughs

The Replacement London Plan goes beyond a strategic planning document to seek to take control of some of the functions of the London Authorities, potentially removing the requirement for an Authority to prepare their own Part 1 Plans. This goes beyond the remit of the function of the London Plan. Local Boroughs have a Duty to Co-operate and where the Mayor does not need to meet the Duty to Co-operate, if the powers are being taken by the GLA then the Mayor must perform the function of the Duty to Co-operate.

There is concern regarding the way the London SHLAA exempts Local Authorities from undertaking their own SHLAA and SHMAs. The application of the approach of the SHLAA cannot be considered the same between Richmond and Waltham Forest for example and as such the London SHLAA should be used to inform more detailed site specific Borough SHLAAs.

Relationship with the wider south east

The plan identifies itself that London is not an island, and it is shown that some 800,000 people a day commute into London for work. As set out above if the Mayor seeks to take powers from the London Boroughs, then the Mayor would need to perform the Duty to Co-operate on their behalf and work with authorities to address any shortfall. Whilst the Mayor commits to meeting the needs within the London Boroughs, a more flexible approach to addressing housing delivery should be considered including densification of transport hubs within the south east as sustainable options.

Development Management Policies

Comments on the development management policies are highlighted below.

Development policies	Comments
Policy D2 Delivering Good Design	<p>Design scrutiny – Policy D2 requires design reviews to be undertaken at least once in addition to pre-application advice if they are:</p> <ul style="list-style-type: none"> - Above the density indicated in Policy D6 - Propose a building defined as tall building or that is more than 30m in height where there is no local tall building definition. <p>Comment: The preparation of Design Codes may slow down development (target 65,000dpa). A system will need to be implemented to speed up the plan making process if all 35 Boroughs are expected to adopt design codes especially for small site delivery which benefit from the ‘permission in principle’ and the ‘presumption in favour’. Each LPA will have a different definition of ‘tall building’. A standardised approach should be applied.</p>
Policy D3 Inclusive Design	<p>Inclusive design promoted – DAS should include inclusive design statement.</p> <p>Comment: No clarification given as to what the threshold is for inclusive design</p>
Policy D6 Optimising Housing Density	<p>The density calculation is based upon the following:</p> <ol style="list-style-type: none"> 1) the site context 2) its connectivity and accessibility by walking and cycling,

	<p>and existing and planned public transport (including PTAL)</p> <p>3) the capacity of surrounding infrastructure.</p> <p>Comment: the density calculation if applied will mean fewer homes will be built than would otherwise be achievable. Potential occupiers of the unbuilt homes will have to live further out which then applies travel pressures and contributes to congestion.</p>
Policy D8 Tall Buildings	<p>Policy D8 states that LPA interprets the definition of tall buildings depending on the area.</p> <p>Comment: A standardised approach to tall buildings would be preferable.</p>
<u>Housing</u>	
Policy H1 Increasing Housing Supply	<p>Policy H1 sets a ten-year target for net housing completions which each local authority should plan for.</p> <p>Comment: There should be a provision within this policy which requires the review of 65,000 target if it cannot be met.</p>
Policy H2 Small Sites	<ul style="list-style-type: none"> • Policy H2 applies weight to smaller sites and its role in delivering housing across London. Boroughs are encouraged to apply presumption in favour of the following types of small housing between 1-25 homes: <ul style="list-style-type: none"> - Infill development of vacant or underused sites - Proposals to increase density of existing residential homes within PTAL 3-6 within 800m of a station through conversions, extensions and redevelopment or existing residential properties. <p>Comment: Urbanissta are supportive of the measures introduced by the new London Plan to increase the number of small sites developed for housing.</p>
Policy H3 Monitoring Housing Targets	<p>H3 highlights that the housing targets will be monitored to take into account homes lost through change of use and demolition.</p> <p>Comment: The policy needs to be refined to set out how often the reviews will take place and whether the information gathered from the reviewed will be published.</p>
Policy H5 Delivering Affordable Housing	<p>Policy H5 sets a strategic target of 50% affordable homes to be delivered across London.</p> <p>Comment: Many sites will struggle to meet the 50% affordable housing target for Council owned land. The viability assessment for any site that is unable to meet will delay the approval of housing schemes and therebyacerbate the affordability crisis.</p>
Policy H6 Threshold Approach to Applications	<p>Policy H6 highlights that the threshold approach applies to ten or more units. Where developments cannot provide 35% affordable housing, a viability assessment is required.</p> <p>Comment: The threshold approach will require careful monitoring. The policy sets a threshold of 35% AH and requires the mayors preferred tenure split to be met. This approach has taken away LPA power and should be amended to allow LPA to have some discretion over the policy approach for affordable housing and the viability of the scheme without applying a one size fits all approach.</p>

<p>Policy H7 Affordable Housing Tenure</p>	<p>The Mayor sets out the following preferred split of affordable products:</p> <ul style="list-style-type: none"> - A minimum of 30% low cost rented homes (social rent/London affordable rent) - A minimum of 30% intermediate products which meet the definition of affordable housing including LLR and LAR <p>40% to be determined by the relevant borough</p> <p>Comment: This Policy takes away LPA power and we consider that it should be under the discretion of London LPAs to determine through their Local Plans. This is not a strategic matter.</p>
<p>Policy H8 Monitoring of Affordable Housing</p>	<p>Policy H8 requires boroughs to have a clear monitoring process to ensure that affordable housing can be delivered on or off site in line with the S106 agreement.</p> <p>Comment: This Policy should include a trigger for the review of policy H5 and H6 if the target of 65,000 dpa is not achievable.</p>
<p>Policy H10 Redevelopment of Existing Housing and Estate Regeneration</p>	<p>Policy H10 sets out that loss of existing housing is acceptable provided that they are replaced by better quality and high density housing.</p> <p>Comment: This Policy requires a threshold approach even for estate regeneration schemes which are replaced on an equivalent basis (where rented floorspace is lost). This again will slow down development.</p>
<p>Policy H11 Ensuring the Best Use of Stock</p>	<p>Policy H11 enables councils to promote efficient use of existing stock by equipping them with mechanisms to ensure stock is occupied.</p> <p>Comment: This policy will need refining. It is not clear on how long property should be left vacant before it is considered as 'buy to leave'. The policy also needs to be clear on the steps that will be taken to ensure best use of stock.</p>