LONDONASSEMBLY
Planning Committee

Andrew Boff AM
London Assembly Member
Chair of the Planning Committee

City Hall
The Queen's Walk
London SE1 2AA
Switchboard: 020 7983 4000
Minicom: 020 7983 4458
Web: www.london.gov.uk

Sadiq Khan
Mayor of London
(Sent by email)

16 April 2020

Dear Sadiq,

London Plan Q&A

On 23 January 2020, the London Assembly Planning Committee held a formal question and answer session with Greater London Authority representatives on the topic of the forthcoming London Plan. The guests were Jules Pipe, Deputy Mayor for Planning, Regeneration and Skills; Jennifer Peters, Strategic Planning Manager; and Rob McNicol, Policy Team Leader.

In addition to the draft Plan itself, we examined the recommendations made by the Planning Inspectors following the Examination in Public (EiP) of the Plan, and the likely impact these may have on housing supply, industrial land and the protection of the Green Belt. I am now writing to you to inform you of our key findings.

Green Belt

This Committee supports your commitment to robust protection of the Green Belt, but we wish you to go further and enhance its multi-functional uses and benefits to support London's resilience to a changing climate by, for example, preventing flooding, increasing woodland and tree cover, supporting food growing, providing habitats for wildlife, boosting

biodiversity, and granting access to green space for recreation and relaxation for Londoners.[1]

You have rejected the Inspectors' recommendation that you should do a review of the Green Belt. Instead, you have said you will do an appraisal of all the spatial development options that lead to a sustainable outcome as part of the next London Plan. When asked if this strategic appraisal would include the Green Belt, Jules Pipe told us:

> *"When going forward with producing the next Plan, whenever that is, part of the debate will have to be about taking a step back and looking at how we can address need in the context that London sits, basically the wider South East, but that is problematic without a regional approach to planning and we do not have that anymore in this country. The Mayor's remit goes only as far as the border of the GLA".*[2]

In the context of this statement, it is important to reiterate that this Committee has previously made representations that the Plan should set out more formalised arrangements for the co-ordination of both contingent planning and a longer term strategic planning framework in London and the wider South East, to better realise the potential of London and its functional urban region. We have argued for a shared research function and framework for collaborative planning, and suggested setting up a 'technical secretariat' to provide evidence that would underpin collaboration and identify sustainable growth locations in the wider South East.

The panel informed us of the existing work underway to collaborate with the wider South East, including working with individual local authorities and representative bodies. We also discussed some of the barriers perceived to be standing in the way of establishing a technical secretariat, including national Government opposition to regional planning, and issues of trust stemming from perceptions of the impact of London's growth on the wider South East. Jennifer Peters summarised:

> *"Without the Government's backing, the only way we can do it is through very much a partnership approach, which is slow and is likely to have people who are not in agreement. The idea about having a dedicated technical resource is a good idea, but we would still need to be getting those different parties on board. That conversation is yet to be had and it would not necessarily be an easy one, even though, to a lot of us, it seems like a simple solution would be very useful."*[3]

The Committee maintains that, despite potential difficulties in establishing this approach, a technical secretariat is a necessary precondition to effective strategic appraisal due to the importance of involving the wider South East.

---

[1] Mayor of London, Response to Inspectors' Recommendations, December 2019 p.10
[2] Transcript of Planning Committee Meeting, January 2020 p.8
[3] Ibid, p.10

Family homes

The protection and supply of family sized housing has been an important issue for the Committee throughout this Mayoralty. Ahead of and during the EiP, the Assembly argued against the assumptions underlying the size mix calculations in the Strategic Housing Market Assessment (SHMA). The principal issue was the assumption that no households in either the private or affordable rented sector would have a spare room. To be clear, this is not just about "under-occupation", which is defined as having ***two or more*** spare rooms than required, according to the 'bedroom standard', but also that no renting households would live in homes with exactly one 'spare' room – for example, a couple renting a two-bedroom flat, or a family with two young children living in a three-bedroom home. The rate of under-occupation in the rented sectors is low, at around 8%, but nearly a third of renting households have exactly one spare room, and a further 16% are 'overcrowded' (i.e. they have fewer rooms than they require).[4]

This assumption resulted in the scenario, initially presented as the only scenario in the Plan, which provided that 55 per cent of all new homes, and 69 per cent of low-cost rented homes, should be one-bedroom units. The Committee has long been concerned that this does not adequately reflect the need for family-sized homes in London, and is based on assumptions that are extremely unlikely to occur.

Ahead of the EiP, your London Plan team produced a new third scenario, based on current rates of occupation continuing into the future. By removing the above assumptions, the identified need for one-bedroom units reduces to 30%, and increases to 43% for family-sized homes. The Committee believes this is a more realistic size mix to meet London's needs, against the backdrop of growing levels of overcrowding, especially in one- and two-bedroom homes in the private rented sector.

The Committee notes that, following this meeting in January, the Deputy Mayor for Planning, Regeneration and Skills updated the SHMA's executive summary to make it clear that this third scenario – and not those that made assumptions about renters having no spare rooms – be used as a starting point for boroughs and decision makers when considering the appropriate size mix requirements for their area, and hope that you use these figures as a benchmark when considering applications that are referred to you. We have nevertheless been concerned that there is not sufficient incentive for the development of family-sized homes throughout the Plan. The Committee suggested that developers may still choose one of the three scenarios that is most desirable to them, and while the panel asserted that it was for boroughs to determine the appropriate housing mix and impose this on developers, we remain concerned that there has been and will continue to be an overprovision of one- and two-bedroom units that will exacerbate overcrowding, and we will closely monitor the delivery of larger homes as the new Plan is implemented.

[4] *The 2017 London Strategic Housing Market Assessment (2nd update)*, p. 4

Given that the SHMA was carried out in 2017, the Committee would ideally like to see new work be carried out in the next year, based on more up-to-date demographic evidence from the Office for National Statistics (ONS) and the GLA's own in-house teams. Any new SHMA, or equivalent assessment, should not make the same assumptions about occupation rates that the 2017 version did in its initial two scenarios, and should consider prioritising urgent need, while allowing for housing aspiration, such as a household having a spare room, rather than strictly applying the bedroom standard to all. The Committee would also like to explore further with you and your team the idea of carrying out a specific London Housing Survey, rather than relying on a small sample of the English Housing Survey, so that City Hall can have a more robust understanding of London's households and their needs. This should lead to supplementary planning guidance developed that is based on recommending a new scenario that allows all renting households to have a spare room, as a robust, evidence-based method of deciding the appropriate size mix for developments.

Small sites

The Committee has raised concerns about small sites, including that the policy on protection of green spaces only relates to open space and does not include private gardens, and that non-designated green spaces, such as local play spaces, are at risk of development. Jules Pipe asserted that such development would "*depend on all the other policies in the Plan which would make the scenario of it just being plonked down on part of a back garden rather unusual and very hard to achieve*".[5] We are not convinced that this approach is sufficiently robust to protect family homes and back gardens from inappropriate development, and maintain that it would be better to focus the small sites policy on genuinely redundant small sites.

Tall buildings

The Committee is concerned that the new Plan does not provide adequate guidance to ensure new tall buildings are appropriate to their location and surroundings. The panel stated that supplementary planning guidance (SPG) was being developed to this effect. In particular, Jennifer Peters mentioned that they are looking to do an SPG on design and an SPG on characterisation, which will help boroughs understand the appropriateness of tall buildings in a particular locale, and what is considered 'tall' within their context. We note that the pre-consultation draft of your *Good Quality Homes for All Londoners* guidance has now been published.[6] The Committee plans to investigate the different social, environmental and economic impacts of various building typologies, and we hope to respond to this consultation to ensure that the full cost of tall buildings is translated into planning guidance.

The Committee has long been concerned that the Plan, and previous plans, do not distinguish between tall buildings of different uses (residential, commercial or mixed use). The policies come from a time when the majority of tall buildings planned were commercial

[5] Ibid, p.18
[6] Good Quality Homes for all Londoners SPG Pre-consultation draft

office buildings, but current evidence finds that 90% of the 541 tall buildings planned in London are for residential use.[7] The Committee previously argued for a distinction between commercial tall buildings and residential tall buildings. We were pleased to hear that the design or characterisation SPG will take into account these different uses when deciding whether tall buildings are appropriate in a location.

Industrial land

The Committee is interested in protecting light industrial spaces, where possible and locally appropriate, to support London's economy and SMEs. This is particularly important in relation to the impact of Government's policies on permitted development rights, which are the subject of an upcoming letter from the Committee to the Secretary of State at the Ministry for Housing, Communities and Local Government. During our Committee meeting, some of the challenges relating to preserving this space were highlighted. For example, when true light industrial use (for example, this would include food processing, prop design, and other makers) is lost during redevelopment on the promise of developers re-providing it in a new form, this new form is often office space and retail, which we do not consider true light industrial use.

We were encouraged by the panel's assertion that the Plan has policies to encourage the bringing forward of true light industrial provision underneath and as part of developments, and a specific policy on non-designated industrial sites which requires developers to demonstrate redundancy if they are not re-providing the industrial use. However, part of demonstrating redundancy requires evidence of marketing with appropriate lease terms for at least 12 months. The Committee maintains that this test is flawed, as developers seeking to change the use class have no incentive to appropriately market the industrial space. We suggest the application and outcomes of this test should be rigorously monitored.

The Committee questioned the panel on whether small areas, such as a high street, could be designated industrial land. We were interested to hear that this was possible, and suggest it should be modelled into guidance for boroughs seeking to increase their industrial capacity.

We also suggested to the panel that a new demand study looking at emerging industries would be beneficial in determining future land releases. We were encouraged that a new industrial land supply study will consider this issue closely.

In conclusion, the Committee hopes you will take cognisance of these findings when developing guidance and other policy positions during the life of the new London Plan.

We note that the Secretary of State has now responded to your 'Intend to Publish' version of the Plan, and has made many directions to the Plan, including some that relate to the issues raised above. The Committee will be examining these, and their impact on the final published Plan, as part of our continuing scrutiny of the Plan's application in practice over the coming years.

[7] NLA, *London Tall Buildings Survey 2019*

The Committee would welcome a response by 18 May 2020. Please address your response to Sarah-Jane Gay, Senior Policy Adviser, at Sarah-Jane.Gay@london.gov.uk.

Yours sincerely,

Andrew Boff AM
Chair of the Planning Committee