

GREATER LONDON AUTHORITY

[REDACTED]
(By email)

Our Ref: MGLA290719-8712

14 August 2019

Dear [REDACTED]

Thank you for your request for information which the GLA received on 26 July 2019. Your request has been dealt with under the Environmental Information Regulations (EIR) 2004

Re draft SHLAA methodology, you asked for;

I would like to see who was consulted, upon what and the responses received

Our response to your request is as follows:

- *Who was consulted?*

All of London's Local Planning Authorities and:

Barton Willmore	Historic England	Oxfordshire CC
Bracknell Forest BC	Home Builders Federation	Planning Advisory Service
Cambridgeshire CC	Hyde group	Reigate & Banstead BC
Central Bedfordshire Council	Just Space	RICS
Chelmsford City Council	Kent CC	RB of Windsor & Maidenhead
Dartford BC	London Councils	South Bucks DC
East Herts DC	London First	South Cambs DC
Environment Agency	London Forum	Southend-on-Sea BC
Essex CC	London Tenants Federation	Southern Housing
Gravesham BC	Luton BC	Surrey CC
Hampshire CC	National Housing Federation	Surrey Heath BC
Hertfordshire CC	Norfolk CC	Thurrock Council

- *Upon what [were they consulted]?*

The attached Draft SHLAA methodology

- *What and the responses received?*

The responses received are in the attached file. Please note that some individual names are exempt from disclosure under Regulation 13 (Personal information) of the EIR. This information constitutes as personal data which is defined by Article 4(1) of the General Data Protection

Regulation (GDPR) to mean any information relating to an identified or identifiable living individual. It is considered that disclosure of this information would contravene the first data protection principle under Article 5(1) of GDPR which states that Personal data must be processed lawfully, fairly and in a transparent manner in relation to the data subject.

If you have any further questions relating to this matter, please contact me, quoting the reference at the top of this letter.

Yours sincerely


Principal Strategic Planner


If you are unhappy with the way the GLA has handled your request, you may complain using the GLA's FOI complaints and internal review procedure, available at:

<https://www.london.gov.uk/about-us/governance-and-spending/sharing-our-information/freedom-information>

Draft SHLAA Methodology

This paper outlines the proposed methodology for the next SHLAA. Boroughs and other stakeholders should provide feedback and comments on the draft methodology by 20th January. Consultation responses should be sent:

By email to - LondonSHLAA@london.gov.uk

By post to - 
Greater London Authority
City Hall
The Queen's Walk, London SE1 2AA

1 Introduction

1.1 In line with national planning policy and guidance, the next London Plan will need to be informed by a Strategic Housing Land Availability Assessment (SHLAA). The purpose of the SHLAA is to identify the amount of housing capacity in London that is suitable, available and achievable during the plan period in order to address housing need. The study will cover a 25 year period from 2016 to 2041 and will inform the housing targets in the London Plan. This will be supported by a separate viability assessment. The draft methodology is structured as follows:

- Section 1 provides an introduction and sets out the context to the SHLAA study
- Section 2 summarises the density estimates proposed for the SHLAA
- Section 3 explains the probability based approach applied to 'potential' large sites and explains how planning policy, environmental and delivery constraints will be applied in the study
- Section 4 sets out the range of potential scenarios that will be tested in the study
- Section 5 sets out the approach to small sites and long term vacant homes

Sources of capacity

1.2 The study will draw on the following sources of capacity:

- **Approvals** – net housing provision from London's pipeline of large sites with planning permission (0.25ha or larger), identified in the London Development Database (LDD). This takes into account any housing completions undertaken on sites where development has already commenced. It will also include non-self contained housing (eg accommodation for students and specialist housing for older people).
- **Allocations** – large sites which are allocated or informally identified for housing/mixed use redevelopment (0.25ha or larger) – these sites have been provided to the GLA by boroughs.
- **Potential sites** – other potential large sites (0.25ha or larger) which are currently in the SHLAA system or have been identified through the call for sites or through GLA/TfL development capacity studies in opportunity areas and associated with transport schemes. In addition, boroughs will be able to add new large sites and edit site polygons drawing on their local knowledge.

- **Small sites** – annual trends in conventional housing completions on small sites under 0.25ha in size (2004/5 – 2014/15), taking into account potential for these trends to be increased through changes to planning policy and scenario testing.

Project timescales for the SHLAA

- 1.3 To inform the draft London Plan the SHLAA needs to be completed by summer 2017, with initial results finalised by ~~the~~ June. In order to meet this deadline it is necessary to:
- carry out site assessment and borough one to one meetings between February and May
 - undertake various scenario tests alongside the site assessment process
 - finalise and write up the SHLAA document by the end of August 2017

Background and context to the study

- 1.4 The next housing need assessment (SHMA) is likely to show a higher overall housing requirement due to faster household population growth and worsening housing affordability. Initial GLA estimates suggest this could result in an annual housing requirement of between 55,000 and 65,000 homes, with affordable housing need likely to comprise more than half of this figure. Indicative results from the SHMA are likely by March to inform the Full Review of the London Plan. The final SHMA and SHLAA studies will be published alongside the Draft London Plan in Autumn 2017.
- 1.5 The NPPF requires that plans meet the full, objectively assessed need for market and affordable housing as far as consistent with the policies set out in the Framework¹. The SHLAA plays an important role in understanding the extent to which London has the land capacity to meet its objectively assessed housing need, taking into account the range of economic, environmental and social policy objectives and an understanding of potential deliverability constraints.
- 1.6 The proposed methodology for the new ~~SHMA-SHLAA~~ broadly follows the same approach as the previous SHLAA which was found sound during the Further Alterations to the London Plan Examination in Public (EiP) and at previous London Plan EiPs. Further refinements are suggested to the SHLAA methodology in this paper. These aim to ensure potential housing capacity is not being under-estimated, while understanding the competing land use priorities and without undermining the overall robustness of the SHLAA. This follows a detailed review of the previous SHLAA methodology in light of national guidance and the site assessment process.
- 1.7 The SHLAA system has been designed to ensure there is sufficient flexibility to enable different policy options to be modelled and tested to inform the Full Review of the London Plan, taking into account various policy scenarios. This includes:
- different scenarios in terms of industrial land release (see below)
 - the impact of key transport infrastructure schemes on housing capacity, land uses and potential densities, including Crossrail 2, the Bakerloo line extension and other potential transport schemes and potential station intensification areas (see pages 22-23)
 - the potential for existing trends in housing completions on small sites to increase by enabling additional housing intensification on available small/infill sites and within the existing housing stock, for example through suburban intensification, through

¹ NPPF paragraph 47

changes to planning policy and other potential planning mechanisms, eg brownfield/small sites registers and permission in principle. The methodology for undertaking this assessment will be shared with boroughs at a later date and discussed in more detail (see pages 23-24).

- the potential for additional housing intensification in town centres and out of town retail locations, taking into account town centre health check findings and other evidence on retail demand (see page 20)

Industrial land research

- 1.8 The NPPF recommends undertaking review of employment land alongside SHLAA housing capacity studies to ensure evidence is fully integrated². Having published an Industrial Supply Study in 2016, the GLA is currently undertaking an Industrial Land Demand Study. This will update the London Plan annual benchmarks and borough classifications for industrial land release for 2015-2041 and will feed into the final assumptions made in the SHLAA and housing targets.
- 1.9 The industrial demand study will consider the potential impacts on London's economy and sustainability of different policy scenarios, such as:
 - an **industrial supply-led scenario**: i.e. what would be an appropriate quantum, mix and location of industrial provision within London/wider south east property market areas to service London's needs
 - an **infrastructure-led scenario**: this would consider the level of industrial land release that might be needed to deliver Crossrail 2 and the Bakerloo Line Extension.
 - a **tipping point scenario**: exploring the maximum quantum of industrial land that could be released without significant adverse impact on the London economy.
 - a **trend-based scenario**: this scenario would assume that recent trend rates of industrial land release continue at around 100ha per annum
- 1.10 In addition, the study will also consider the scope for intensification and co-location of some industrial activities with other uses (including residential) and the potential for the wider south east to accommodate some of London's demand for industrial land. The demand study should be finalised in the New Year and an appropriate scenario or combination of scenarios will be carried forwards as the basis for the new London Plan. This will be informed by the housing capacity findings in the SHLAA.
- 1.11 Consequently, the housing capacity estimates on industrial sites in the SHLAA will need to be closely monitored and potentially revisited during the SHLAA study in order to align the SHLAA with the preferred approach to industrial land release in the new London Plan. This will ensure that housing targets reflect the level of industrial land release that is considered appropriate in each borough and should provide additional certainty for Local Plan preparation.

Confidentiality – potential sites

- 1.12 Site specific information on all 'potential' sites in the SHLAA will remain confidential, as the SHLAA provides an aggregate, probability based estimate of the potential housing capacity on these types of sites. Specifically identifying potential sites might undermine

² NPPF paragraph 161

current uses, pre-empt the statutory planning making/decision making process, and affect land values which could compromise wider planning objectives.

- 1.13 Consequently, it is for each borough to determine whether information on potential sites should be made publicly available at site level, eg in terms of their Local Plans, housing trajectories and brownfield registers. As part of the study the GLA will only publish information about sites with planning approval or which are already publicly identified as suitable for housing, eg Local Plan allocations. These approved and allocated sites will be published on the London Datastore on the Mayor of London website³.

The GLA's call for sites

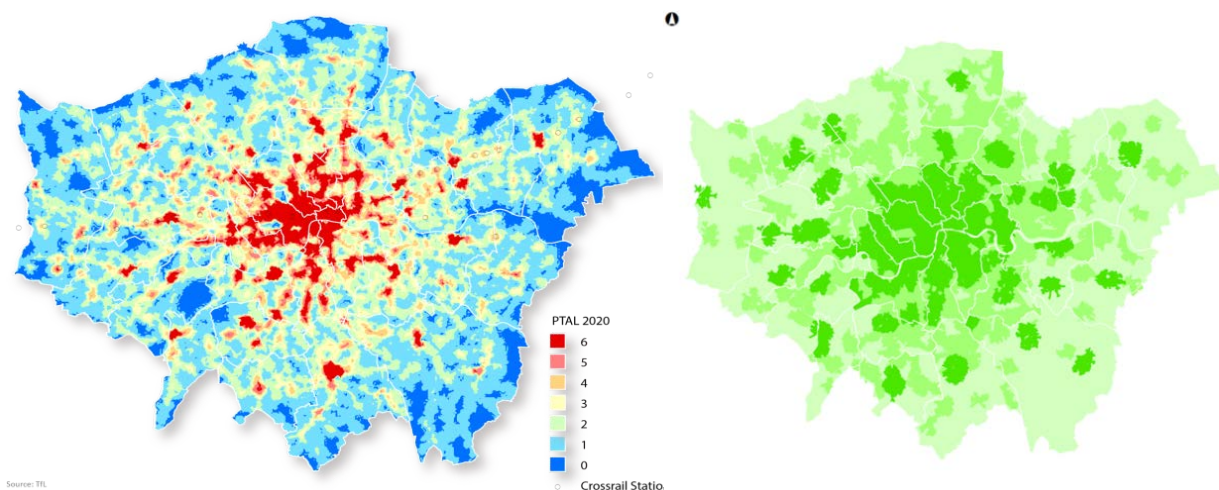
- 1.14 In line with national planning guidance, the GLA has carried out a call for sites, jointly with boroughs. This was advertised on the GLA website, through direct mail outs to stakeholders, coverage in London First's industry newsletter and through boroughs' websites. Approximately 1,300 sites have been submitted through the call for sites. The exercise has also provided an appreciation of land owners and developers aspirations for those sites and their views on deliverability, constraints and phasing which can feed into site assessments.
- 1.15 The call for sites data has now been digitised by GLA officers and will be shared with boroughs in GIS format along with supporting representations and documents which have been provided by stakeholders. A number of boroughs are also undertaking their own call for sites processes and this information should be fed into the SHLAA, with boroughs able to add extra sites to the SHLAA system.

2 Density estimates

- 2.1 Density estimates for sites with planning permission are based on the approved net residential density in LDD.
- 2.2 Density estimates for allocated and potential sites will be derived from the London Plan density matrix, with estimates set to the top of the relevant density range in town centres and higher assumptions applied in opportunity areas to reflect density trends and their strategic importance in terms of housing delivery.
- 2.3 The London Plan density matrix is based on the setting\character of an area and the Public Transport Accessibility Level (PTAL). To reflect this, the system will use GIS data for PTAL and character settings in order to assign density estimates to sites. The following maps will be used in the SHLAA:
- PTAL maps 2011, 2021, 2031 which reflect committed transport schemes – therefore the assumed phasing and delivery timescales for a site will impact the PTAL and density assumed
 - An updated character settings map prepared by ARUP as part of the GLA's density research. This relies on 2011 census data and updated town centre boundaries. A 1km 'networked buffer' from town centre boundaries is applied in the map to reflect actual walking distances. The criteria and thresholds used to define settings on the character map are set out below:

³ <https://data.london.gov.uk/>

Setting	Attributes	
	Housing stock ⁴	Proximity to town centre
Central	>75% flats	1km of International, Metropolitan or Major town centre boundary
Urban	>75% flats and terraced housing	1km of District town centre boundary
Suburban	All other areas	All other areas
An area only needs to fulfil one of these criteria to be classified as 'central', 'urban' or 'suburban'		



2.4 The London Plan density matrix sets out density ranges for different PTAL levels (0 to 1; 2 to 3; and 4 to 6) and character settings (suburban, urban and central) and subdivides broad ranges into those based on habitable rooms per unit. The matrix is shown in Appendix A.

2.5 Default density assumptions proposed for the SHLAA are set out below, which would apply to all large sites depending on their location, character setting and PTAL. As density assumptions are based on PTAL levels, the density estimates will depend on the phasing of a site and will reflect how PTAL levels change over time, as committed transport schemes are delivered – eg Crossrail 1. For example, housing capacity likely to come forward in phase 2 and 3 of the SHLAA (2021-2029) will be based on the PTAL map for 2021; capacity in phase 4 (2029 to 2034) will be based on the PTAL map for 2031. Phasing periods are set out in Table 10 (page17).

Standard density assumptions

2.6 Standard density assumptions in the SHLAA are based on the high point in the 3.1 to 3.7 habitable room per unit range in the matrix, taking into account PTAL and character setting (see Table 1). This seeks to ensure that the SHLAA estimates reflect the need to optimise development whilst allowing for a broad range of housing typologies appropriate to the location and a range of unit sizes including family sized homes. It also ensures that the SHLAA does not under-estimate potential housing capacity, taking into account trends in residential densities on large sites.

⁴ Derived from census data

Table 1 - Standard density assumptions

PTAL	0 - 1	2 - 3	4 - 6
Suburban	65	80	115
Urban	80	145	225
Central	100	210	355



Density assumptions in town centres

- 2.7 In town centres, densities are set at the top of the relevant density range (see Table 2). All town centres are considered to be either urban or central, reflecting the notes to density matrix in the London Plan (see Appendix A).

Table 2 - Town centre density assumptions

PTAL	0 - 1	2 - 3	4 - 6
Suburban	-	-	-
Urban	95	170	260
Central	110	240	405



Density assumptions in opportunity areas

- 2.8 Different density assumptions are applied in opportunity areas to reflect their importance in terms of the delivery of new development in London and to ensure that the SHLAA does not under-estimate the potential housing capacity in these locations (see Table 3). These assumptions are set out below and assume that:

- sites with suburban settings could potentially be developed at urban densities
 - sites with urban settings could potentially be developed at central densities
 - sites with central settings could potentially be developed at central+ densities.
- These are set above the relevant maximum range in the density matrix

Table 3 - Opportunity area density assumptions

PTAL	0 - 1	2 - 3	4 - 6
Suburban	80	145	225
Urban	100	210	355
Central	250	350	450



- 2.9 These density estimates allow for a broad range of housing typologies and sizes to be provided and are set below the average density of approvals on large sites in opportunity areas in order to not over-estimate potential densities. These trends are shown in Table 4 below.

Table 4 - Average density trends in opportunity areas - approved large sites (0.25 hectares and more) between 2004-2016

PTAL	0 - 1	2 - 3	4 - 6
Suburban	83	204	337
Urban	150	226	329
Central	406	363	453

- 2.10 Where sites are in town centres as well as opportunity areas the opportunity area density will apply.

Borough amendments to density estimates

- 2.11 Boroughs will be able to adjust the density assumptions on all potential and allocated sites where they consider the density should be different to the system estimate. Changes in density would normally only be where boroughs have undertaken a detailed site appraisal or design-led exercise to establish a more appropriate density estimate for a site, or where boroughs are involved in emerging masterplanning work or pre-application discussions with a landowner or developer on a site, which would suggest the use of an alternative density assumption.
- 2.12 Reductions in density estimates would need to be clearly justified in terms of specific sites constraints (eg an identified heritage asset) which would reduce the density likely to be achieved on site and could not be mitigated or resolved through good design, eg stepping down building heights along the edge of a site. Local infrastructure capacity is considered through the constraint testing process (see delivery constraints), so will not be used as a reason for reducing the density estimate for a site.
- 2.13 In the 2013 SHLAA around a third of sites had their initial densities amended, with 70% reduced and 30% increased. In the next SHLAA, changes in density will be scrutinised

closely by GLA officers, taking into account trends in approvals and completions on broadly comparable sites/locations in London.

- 2.14 Boroughs would also be able to amend the land use mix assumed on a site, which will reduce the net residential site area accordingly. However, boroughs will not be able to change the character settings in the system which will remain fixed to ensure consistency of the underlying data in the system.

OAPF capacity studies

- 2.15 To support a number of Opportunity Area Planning Frameworks (OAPFs) the GLA in partnership with the relevant boroughs has undertaken more detailed design-led development capacity studies. These typically identify the potential for development to come forward at higher densities than the estimates relied on in the SHLAA. GLA officers will share these findings with relevant boroughs to ensure that the density estimates and land use assumptions feed into the SHLAA and to align the study with OAPFs being prepared. Boroughs will be encouraged to amend the default density assumptions in the SHLAA so that they reflect those being used in OAPF development capacity studies.

LSE density model update

- 2.16 The GLA is currently working with the London School of Economics (LSE) and Transport for London (TfL) to further develop a model for assessing potential residential densities across London. This model considers various characteristics⁵ to estimate site density having statistically analysed the significance of each characteristic in influencing density using completed developments between 2008 and 2015. Whilst the model is not currently operational for use in the SHLAA, it may be used to benchmark or scenario test the housing capacity assumptions following the site assessment process.

3 Constraints testing process - ‘potential sites’

- 3.1 The methodology for assessing housing capacity on ‘potential’ sites in the SHLAA is specifically tailored to suit London’s highly pressurised and unpredictable land market where 98% of housing is delivered on brownfield sites and where significant amounts of future capacity comes forward on ‘potential’ sites which are currently in other active land uses. On aggregate, this approach provides a robust method of estimating potential housing output in London that is more sophisticated than traditional ‘windfall’ estimates based on trends in completions. This is because it takes into account potential capacity but also considers the various site specific planning, environmental and delivery constraints and how these may affect the rate of housing completions without assuming every individual site will come forward for development.
- 3.2 The overall amount of achievable and deliverable housing capacity on ‘potential’ large sites will be estimated using a probability based approach. This assigns a probability score (%) to each potential site based on the number and severity of identified planning policy, environmental and delivery constraints. These are set out below in Table 5:

⁵ PTAL, job accessibility, distance to centre, population density, suburban character, central character, opportunity/intensification areas, town centres.

Table 5 – constraint categories

Planning policy constraints	<ul style="list-style-type: none"> • Designated open space • Strategic Industrial Land (SIL) • Locally Significant Industrial Locations (LSILs) • Non designated industrial sites which boroughs wished to retain • Safeguarded Wharves
Environmental Constraints	<ul style="list-style-type: none"> • Flood Risk • Aircraft noise pollution • Health and Safety Executive consultation zones • Pylons
Delivery constraints	<ul style="list-style-type: none"> • Land ownership • Local Infrastructure • Contamination

Probability based approach

3.3 The same “constraints model” approach as in previous SHLAA studies will be used to provide an estimate of housing capacity on potential sites. This constraints model works in the following way:

- sites are assigned a notional density, based on the residential site area and a density estimate
- where a site is expected to be mixed use, boroughs can adjust the land use assumptions for each site, which amends the net residential site area
- the system then assigns a probability estimate of a site coming forwards for development based on the number and severity of policy, environmental and delivery constraints affecting it. These constraints are set out in Table 5 and are identified using GIS data and local knowledge through the site assessment process.
- the lowest percentage probability score across the three constraint categories – planning policy, environmental and delivery constraints – is applied to the notional density in order to provide a ‘constrained housing capacity estimate’ for the site in question. The probability score also impacts the assumed phasing period for a site.
- For example, if a site has a notional capacity of 100 units and an 80% probability of coming forward for development, the constrained housing capacity is assumed to be 80 units.



Illustrative example:



Allocated sites

- 3.4 In previous SHLAAs, allocated sites were also subject to the same constraint testing process as 'potential sites', with probability based constrained housing capacity estimates provided. However, this under-estimates the potential for housing delivery on these sites and does not reflect their formal planning status as sites that are considered suitable for residential and mixed use development. In the 2017 SHLAA it is proposed that housing capacity on allocated sites is based on notional housing capacity estimates in order to better reflect the higher likelihood of housing being delivered and also to ensure that the most realistic level of capacity is assumed. This would apply to all sites allocated for residential or mixed use development in an adopted DPD or informally identified in an SPD.
- 3.5 Constraints affecting allocated sites will be identified in the SHLAA system using GIS information and local knowledge and the probability scores would be recorded in order to inform the phasing assumptions used in the system. Boroughs will be able to adjust the land use mix and phasing assumptions for each site. Where allocations are for alternative uses, eg school sites, boroughs will need to amend the land uses accordingly.

Planning policy constraints

- 3.6 The approach to planning policy constraints is set out below in Table 6, with further detail provided in the supporting text below. Assumptions on industrial land will need to be monitored and potentially revisited in order to reconcile SHLAA with the approach taken in the London Plan in terms of industrial land release, taking into account the findings of the industrial demand study. However, as a starting point for the assessment boroughs should follow the approach outlined below in Table 6.

Table 6 – Planning policy constraints

Ref	Constraint	Source	Categories	Default probability assumption	Borough editable
1	Designated open space	GIS constraint layer	Yes or no	0% probability - unsuitable	Yes
2	Strategic industrial location (SIL)	GIS constraint layer	Yes or no	0% probability – unsuitable †	Yes
3	Safeguarded Wharves	GIS constraint layer	Yes or no	0% probability - unsuitable	Yes
4	Locally Significant Industrial Sites (LSIS) designated in a Local Plan	GIS constraint layer	Restricted	40% probability	Yes
			Limited	50% probability	
			Managed	60% probability	

5	Non-designated industrial/ employment site protected by Local Plan policies	GIS constraint layer	Restricted	45% probability	Yes
			Limited	55% probability	
			Managed	60% probability	
<p>⚡ All sites earmarked for release in the industrial supply study should be assessed as potential sites as a starting point (see paragraph 3.14 and Figure 1). This overall quantum of industrial release may need to be revisited at a later date following the demand study.</p> <p>⚡ Borough classifications for industrial land release – restricted, limited or managed – will be updated once the GLA Industrial Demand Study is finalised.</p>					

Designated Open space

3.7 The Mayor has been clear that he wants to protect the Green Belt and other designated green spaces in London⁶. All designated open space will be classified as ‘unsuitable’ by the system and deemed to have a zero per cent probability for development. This includes the following designations:

- Green Belt
- Metropolitan Open Land
- Sites of Special Nature Conservation Interest and Sites of Special Scientific interest
- Other protected public or private open space identified on a borough proposals map (eg parks and squares)

3.8 Boroughs will also be able to classify other protected public or private open space identified on a borough proposal map as unsuitable (0% probability) where the system has not identified in the GLA’s open space constraint layers. Where boroughs are considering de-designating open space in the system this would need to be discussed with GLA officers as part of the SHLAA process, taking into account the strong strategic presumption against development on these types of sites.

Designated industrial land

3.9 As a starting point for the SHLAA study, the approach to industrial land in the SHLAA broadly follows the approach taken in the previous SHLAA and is summarised below.

3.10 Strategic Industrial Land (SIL) will be automatically classified as unsuitable (0% probability) by the system. However, boroughs will be given the option to change this default assumption on a case by case basis. Where sites are considered as potential sites boroughs would be able make provision for employment uses as part of the assumed land use mix for a site.

3.11 For locally significant industrial sites (LSIS), the SHLAA methodology assigns a notional probability estimate which is based on borough classifications for industrial land release in the London Plan (restricted, limited and managed):

- sites within a ‘restricted’ borough are assigned a lower probability of 40%
- sites with a ‘limited’ borough are assigned a probability of 50%
- sites with a ‘managed’ borough are assigned an increased probability of 60%

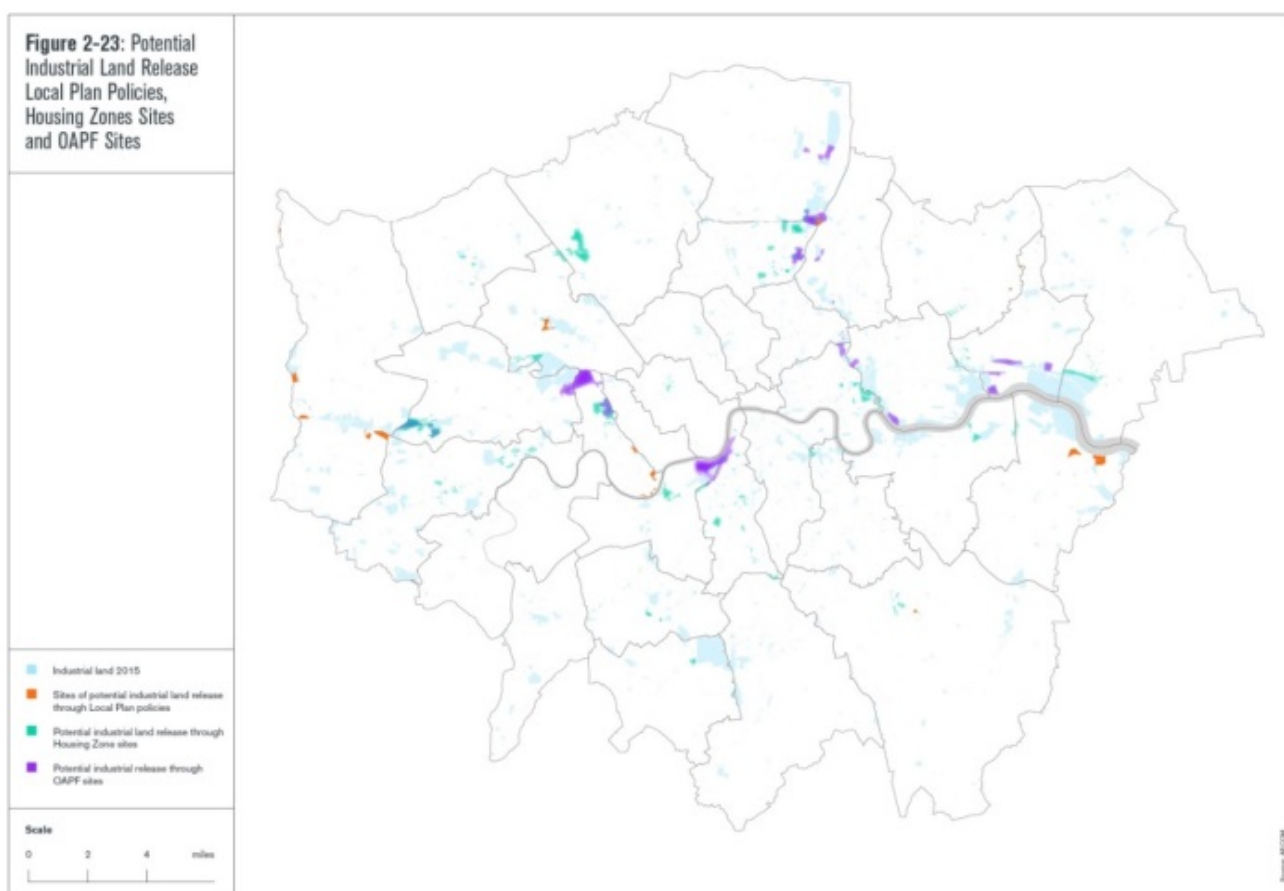
3.12 This approach reflects the fact that the stock of locally designated industrial sites has reduced at a higher rate (23%) compared to SIL (5%). However, boroughs will be able to alter this notional probability assumption, for example where they consider that LSIS

⁶ Mayor of London, A City for all Londoners, page 19

sites should be protected based on local evidence (eg an up to date Employment Land Review); or where they consider that LSIS sites should be released for residential or mixed use development. **These default percentage probability assumptions are a starting point for the SHLAA study and may need to be revisited following the GLA's Industrial Land Demand Study.**

- 3.13 A broadly similar approach is taken for other non-designated industrial land protected by borough Local Plan policies, with probability estimates 5% higher in 'restricted' and 'limited' boroughs and the same estimate for 'managed' boroughs (see Table 6).
- 3.14 All designated and non-designated industrial sites that (including SIL and LSIS sites) that are earmarked for release in Local Plans, Opportunity Area Planning Frameworks (OAPFs) and Housing Zones should be classified as 'potential sites' so that boroughs fully assess the other site constraints and likely phasing of development, as well as the potential density and land use mix. These sites were mapped as part of the GLA Industrial Supply Study based on information available in Autumn 2015 and are shown in Figure 1. The SHLAA system will automatically classify these sites as potential sites. Figure 1 will be updated to reflect emerging proposals in the London Riverside OAPF and Old Kent Road AAP. **This overall quantum of industrial release may need to be revisited at a later date depending on the findings of the industrial demand study and the approach of the London Plan.**

Figure 1 – Potential industrial land release in the development pipeline, Local Plans, OAPFs, Housing Zones



Safeguarded wharves

- 3.15 Safeguarded wharves will automatically be assigned a zero probability to reflect their planning status in the current London Plan. Site specific assumptions in the SHLAA will be revisited if necessary to reflect any emerging amendments to London Plan policy. Where there is already an agreed plan for the consolidation and relocation of a safeguarded wharf use (eg through an OAPF or Local Plan) boroughs will be able to amend these default assumptions and consider the wharf in question as a potential site.

Environmental constraints

- 3.16 GIS layers will also be used to identify environmental constraints including flood risk, aircraft noise pollution contours, pylons and Health and Safety Executive (HSE) consultation zones. These constraints are classified as low, medium or high. The impact of each constraint category on the site probability is shown in Table 7 below.
- 3.17 Individual environmental constraint scores combine to provide an overall cumulative environmental constraint estimate. For example, if a site is classified as 'medium' for flood risk, and aircraft noise and 'low' for pylons and HSE consultation zones, then the site's overall environmental constraint probability estimate will be 80%.

Table 7 – Environmental constraints

Ref	Constraint	Source	Categories	Impact on probability	Borough editable
6	Flood risk	GIS constraint layer and borough knowledge from SFRAs	Low - Areas in Zone 3 benefiting from flood defences	Reduces probability by 5%	Yes
			Medium - areas in Zone 3 not benefiting from flood defences	Reduces probability by 10%	
			High - Zone 3b	Site considered unsuitable (0% probability)	
7	Aircraft noise pollution	GIS constraint layer	Low - below 63 Db	No impact on probability	Yes
			Medium - above 63 Db	Reduces probability by 10%	
			High - above 69 Db	Site considered unsuitable (0% probability)	
8	Pylons	GIS constraint layer	Low - none present	No impact on probability	Yes
			Medium - site intersects with pylon	Reduces probability by 10%	
9	Health and Safety Executive consultation zones	GIS constraint layer	Low – No HSE Zone or Outer Zone	No impact on probability	Yes
			Medium – Middle Zone	Reduces probability by 10%	
			High – Inner Zone	Site considered unsuitable (0% probability) †	

† Where Gas holder sites have been submitted through Call for sites by landowners these sites would not be considered unsuitable and should be assessed as potential sites. This effectively 'turns off' HSE constraints on these sites (see para 3.1719-820).

- 3.18 Low and medium flood risk categories are based on the Environment Agency flood risk data for rivers and sea. Areas in high risk - Zone 3b – have been collated from borough level Strategic Flood Risk Assessments (SFRA). Boroughs are encouraged to review this data and amend site constraints where they have undertaken an SFRA and the level of flood risk is shown to differ from that presented in the SHLAA constraint layer. Site boundaries can also be amended where necessary.
- 3.19 HSE consultation zones cover gasholders and hazardous installations. The HSE's planning advice⁷ does not in principle advise against residential development in the outer and middle zones but does advise against residential development in principle within inner zones, so this is reflected in the probability assumptions in Table 7. However, gasholder sites can also be remediated to enable development and National Grid has a programme of remediating and regenerating gas holders to enable development.
- 3.20 Twenty gas holder sites have been submitted through the call for sites by National Grid and St William, which are considered developable in the short to long-term period by the landowners. HSE zone constraints will be 'turned off' where sites have been put forwards by National Grid/St William in the Call for Sites. Boroughs will then need to assess these sites as potential sites and consider the likely phasing and lead-in times that should be applied, taking into account the information provided by landowners through their Call for Sites submission.

Delivery constraints

- 3.21 For all potential sites boroughs will be able to use their local knowledge and Land Registry data to identify potential delivery constraints. These include land ownership, local infrastructure and contamination. Boroughs will be able to classify constraints as either low, medium or high. Low level constraints have no impact on site probability. Medium constraints reduce the probability of a site being developed by 10%. High level constraints reduce the probability by 20%.

Table 8 – Delivery constraints

Ref	Constraint	Source	Categories	Impact on probability
10	Land ownership	2016 Land Registry Data	Low	No impact on probability
			Medium	Reduces probability by 10%
			High	Reduces probability by 20%
11	Local infrastructure	Borough knowledge, Infrastructure Delivery Plans	Low	No impact on probability
			Medium	Reduces probability by 10%

⁷ Health and safety executive, planning methodology, decision matrix - <http://www.hse.gov.uk/landuseplanning/methodology.htm>

12	Contamination	Borough knowledge	Low	No impact on probability
			Medium	Reduces probability by 10%

- 3.22 The system will be automatically set the constraint level for each category as low by default and the expectation is that boroughs will need to amend this where necessary to reflect known site constraints. The option to select high level constraints will only apply to land ownership as this constraint is considered to have a more significant impact on the probability and deliverability of development, whereas local infrastructure and contamination issues can be more easily mitigated through the delivery of development and enabling works on site.
- 3.23 As with policy and environmental constraints, individual delivery constraint scores are combined to provide a cumulative probability score. For example, if a site scores 'high' for land ownership, 'medium' for local infrastructure and 'low' for contamination its overall probability score for delivery constraints will be 70%.
- 3.24 Boroughs will not be able to set the constraint level to 'unsuitable' (0% probability) for any delivery constraints as they are all considered to be capable of being addressed during the course of the SHLAA period (2016 to 2041). As with all other sites, boroughs will be able to amend the phasing assumptions to reflect the lead-in times considered necessary in order to address identified delivery constraints. These assumptions will be scrutinised by the GLA.
- 3.25 In the previous SHLAA 400 sites were classified as unsuitable due to ownership, a quarter of which were located in town centres. This potentially underestimates the potential for mixed use development in these key growth locations. In addition, a further 30 sites were classified as unsuitable due to infrastructure and contamination constraints.
- 3.26 The benefit of following the above approach is that delivery constraints are registered and tracked and, following the SHLAA, boroughs and the GLA can further analyse the particular constraints and consider what interventions or mechanisms might be conducive and effective in order to bring a site forward or accelerate its development (eg Housing Zone designation and interventions, CPO).

Overcoming constraints

- 3.27 National Planning Practice Guidance on undertaking SHLAAs states that where constraints have been identified, local planning authorities should consider what action would be required to address or overcome these constraints and what impact this might have on housing delivery⁸. For example, this could include resolving fragmented land ownership, investing in new infrastructure, remediating contaminated land or reviewing and amending planning policy designations.
- 3.28 To address this requirement, the SHLAA system will prompt boroughs to consider whether it is possible to overcome any identified planning policy, environmental or delivery constraint, drawing on the list of mitigation measures/options outlined below. Where boroughs consider this would be achievable and select this option, the system 'turns off' the selected constraint. Selecting this option will therefore reset the overall

⁸ DCLG, Planning Practice Guidance, Paragraph: 022 Reference ID: 3-022-20140306

probability score for the site in question. Alternatively, boroughs may consider it more suitable to amend a site boundary, so that it does not include a particular constraint where the overlap with this constraint is only on part of the site.

Table 9 – Potential options to overcome constraints

Policy Constraints	Potential mitigation/avoidance measures
Strategic Employment Location (SIL)	<ul style="list-style-type: none"> – De-designate SIL (where justified by other circumstances) – Allow mixed-use development, including employment provision and office or industrial workspace – Re-provide SIL elsewhere through a land swap
Locally significant industrial site (LSIL)	<ul style="list-style-type: none"> – De designate LSIL (where justified by other circumstances) – Allow mixed-use development
Other Protected Industrial Site	<ul style="list-style-type: none"> – De designate protected site (where justified by other circumstances) – Allow mixed-use development
Environmental Constraints	Potential mitigation/avoidance measures
Aircraft Noise Pollution	<ul style="list-style-type: none"> – Design mitigation measures for proposed residential development (eg. assume higher levels of sound insulation on all units)
Flood Risk	<ul style="list-style-type: none"> – Provide set-back on-site / develop only part of the site – Provide effective flood mitigation measures on-site, eg SUDs – Provide less sensitive land uses at ground level (eg commercial, parking) and reduce density – Provide other off-site flood mitigation measures to improve resilience to flooding
Pylons	<ul style="list-style-type: none"> – Pylon under grounding (funded by development) – Pylon under grounding (not able to be funded by development) – Pylon re-routing
Health and Safety Consultation Zones	<ul style="list-style-type: none"> – Develop part of site and reduce site boundary or net residential area – Remediate site
Delivery Constraints	Potential mitigation/avoidance measures
Ownership	<ul style="list-style-type: none"> – Fragmented land ownership assembled / acquired by landowner/developer over time – Compulsory purchase of site – Acquisition of site by developer and the relocation of existing business or land use – Joint venture between existing business and developer to accommodate mixed use development and housing
Local Infrastructure	<ul style="list-style-type: none"> – Provide enhanced public transport infrastructure – Minor changes to local road network – Provide additional utilities services

	– Require contribution to social infrastructure provision
Contamination	– Decontaminate land (funded by development) – Decontaminate land (may require funding) – Develop only part of site

Phasing of sites

- 3.29 The phasing of a site is informed by the status of development (approval, allocated, Potential, etc), its size and type and judgements around the feasibility and viability of the site. This study is divided into five phases by financial year, these are shown below on Table 10. Phase 1 is the preliminary phase; from the date of the study to the year the new London Plan is expected to be adopted (2019), phases 2, 3 and 4 are five year phases, with the final phase a seven year phase to take the assessment to the end of the plan period.

Table 10 – SHLAA phasing periods

	Phase 1	Phase 2	Phase 3	Phase 4	Phase 5
Start	April 2016	April 2019	April 2024	April 2029	April 2034
Finish	March 2019	March 2024	March 2029	March 2034	March 2041
Years	3	5	5	5	7

- 3.30 The system will generate default phasing based on the status of an individual site and its probability for development. Boroughs will be asked to check the phasing of every site (including approvals) to ensure that realistic but ambitious phasing is assumed. Boroughs will be able to refine default phasing assumptions where necessary to reflect anticipated lead-in times and build out rates, drawing on local knowledge. As a starting point, the following system defaults are suggested:

- sites with planning permission on which development has started are allocated to phase 1 (2016 to 2019)
- all other sites with planning permission but where development has not started are allocated to phase 2 (2019 to 2024)
- Potential/allocated sites that have a 100% probability are allocated to phase 2 (2019 to 2024)
- Potential/allocated sites with probability of less than 100% but greater or equal to 60% are allocated to phase 3 (2024 to 2029)
- Potential/allocated sites with probability less than 60% are split between phase 3 and 4 (2024 to 2034)
- Capacity on 'low probability' sites is split between phases 3, 4 and 5 (2024 to 2041)

- 3.31 In addition to this and to ensure capacity from individual large sites is spread realistically across phasing periods, the system will set defaults for the maximum amount of housing capacity that can be assigned to each phasing period from an individual large site. These 'caps' are set at an optimistic level for very large sites and are expected to provide an indicative guide and starting point. Boroughs will be able to amend phasing assumptions based on local knowledge.

Phase 1	Phase 2	Phase 3	Phase 4	Phase 5
2,000	3,000	3,000	3,000	4,000

Housing targets

- 3.32 Housing targets in the London Plan have historically been set as minimum 10 year targets, with annual monitoring targets provided. Boroughs are expected to roll forward their annual monitoring targets beyond this period (London Plan Policy 3.3D). However, the SHLAA study will explore the scope for the London Plan to provide longer 15 year minimum targets which would better align with the typical horizons for Local Plan.
- 3.33 It will also explore whether it would be more appropriate for annual monitoring targets to be based on five year phasing periods (see below), with average annual figures provided for each phase, rather than a 10 year average. This more trajectory based approach might better reflect the phasing and delivery of sites and ensure that the Government's proposed 'delivery test'⁹ is applied in a fair and reasonable manner in terms of annual housing delivery targets.

Phase 2	Phase 3	Phase 4
2019 - 2024	2024 - 2029	2029 - 2034
Annual average target	Annual average target	Annual average target

Excluded sites

- 3.34 Only those potential sites considered to have a zero chance of coming forward for housing development during the plan period. To be excluded, sites will need to fall into the following categories:
- New build housing completed (since 2003) where additional housing development is improbable during the plan period.
 - Recently completed new build development (since 2010) in the following uses: retail; office; industrial; storage and distribution; hotel; care home; hospital; education; or assembly and leisure. This will be informed by London Development Database information.
 - Office sites in defined commercial core areas within the City of London and north of Isle of Dogs.
 - High value business parks (eg Chiswick, Bedfont Lakes).
 - Sites which include a listed building or scheduled monument where development or intensification is unlikely - before selecting this option, boroughs will need to first consider the potential for sympathetic enabling development around the site; the potential intensification 'behind the façade'; or change of use to residential, where applicable.
 - Primary and secondary schools

⁹ See – NPPF consultation 2015 (page 14) - https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/488276/151207_Consultation_document.pdf and The Spending Review and Autumn Statement 2015 (HM Treasury) https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/479749/52229_Blue_Book_PU1865_Web_Accessible.pdf (page 41)

- Site in strategic operational use for transport, waste or utilities infrastructure which are expected to continue to be in that use over the plan period so redevelopment is considered improbable. This exclusion is for sites that contain strategic infrastructure such as airports, railways, sewerage treatment works, waste sites and associated depots that are in operational use and have no potential of becoming redundant or being relocated over the plan period. A substantial number of operational infrastructure sites have been submitted by public sector land owners and utility providers through the Call for Sites. This includes Transport for London, Network Rail, Thames Water, NHS Property Services and other Government departments. These sites should not be excluded by boroughs based on the fact that they are currently in operational infrastructure use and should be considered as ‘potential’ sites.
 - Strategic cultural/tourist venues and civic buildings which have a zero chance of coming forward for redevelopment or change of use during the Plan period to 2041 – further guidance on this criteria will be set out in the SHLAA guidance notes
- 3.35 Where boroughs have a programme in place for delivering housing on school sites these sites should be included in the SHLAA.

Low probability sites

- 3.36 Low probability status was added to the 2013 SHLAA to address the number of potential sites being excluded from previous SHLAA studies, but which should have been given a housing potential as evidence shows that they do come forward for housing in some circumstances.
- 3.37 Where boroughs chose to classify a site as ‘low probability’ it is considered to have an 8% probability of delivering housing. This probability estimate was established following a review of the number of planning permissions granted on sites excluded in the 2004 SHLAA. A more recent review of sites excluded in the 2009 SHLAA has shown that this estimate continues to provide an appropriate assumption based on planning approvals (2009-2015), even where school sites are removed.
- 3.38 For boroughs to re-classify a potential site as ‘low probability’, this site in question must meet the criteria below:
- A high value retail/leisure/ office¹⁰ development completed before 2010 where there is a low probability of additional housing development before 2041
 - Further education site or hospital with no planned redevelopment before 2041
 - The site is an area of private/mixed tenure housing in multiple ownership with no known plans for redevelopment
 - Social housing estate with no planned intensification programme up to 2041
 - New build housing completed before 2003 where there is a low probability of additional housing development
 - Other reasons where necessary –these will be scrutinised by the GLA.
- 3.39 Capacity from low probability sites is allocated to the later phases of the SHLAA - phases 3, 4 and 5. For the new SHLAA this would mean this capacity is spread between the period 2024 to 2041.

¹⁰ Note that different low probability assumptions are used for offices – see ‘offices’ para 3.43-44

- 3.40 Through the Call for Sites a number of large out of town retail sites were put forward by landowners, eg supermarkets. Where a site in one of these uses is suitable for housing and has been put forward as part of the call for sites it should be considered as a potential site and not a low probability site, given that the landowner has expressed an interest in accommodating additional housing/mixed use development on the site in question.
- 3.41 Other retail, leisure and office sites should also not be automatically assigned with 'low probability' status unless it is clear that the nature of the existing business/land use means that there is a low probability of housing being delivered during the period of the London Plan. Where boroughs consider that housing could be accommodated on sites during the plan period (2019-2041) they should assess sites as 'potential sites' and adjust the phasing accordingly.

Town centres

- 3.42 Town Centre Health Check data, particularly that showing the level of vacant or surplus retail/commercial floorspace and other indicators, eg heritage should be used by boroughs to provide an indication of where additional residential and mixed use development might be accommodated. Through the site assessment process, the GLA will work with relevant boroughs to ensure that the potential sites have been identified and the long-term capacity for development has been proactively considered.

Offices

- 3.43 This section summarises the approach to offices in the SHLAA. Offices will be automatically considered as potential sites in the SHLAA system but boroughs will be allowed to exclude the following types of office sites:
- offices in tightly defined commercial core areas of the City and Canary Wharf – this precise area will be agreed with the relevant boroughs prior to the SHLAA being undertaken
 - recently completed offices (since 2010)
 - offices in high value business parks (eg Chiswick, Bedfont Lakes)
- 3.44 For offices in other locations boroughs will be given the option to assign 'low probability' status to these sites. The probability assumption used will vary depending on a site's location:
- within the CAZ, core areas of the City Fringe OAPF, within an adopted Article 4 Direction area a lower probability assumption of 5% will apply – this reflects the stronger planning protections for offices which apply in these locations.
 - outside these locations a higher 10% probability is assumed – this reflects permitted development rights (which have been made permanent) and higher numbers residential units approved on office sites since these rights were introduced.
- 3.45 Boroughs should consider office sites as potential sites if they consider that they are likely to come forward as housing during the Plan period. Sites should only be assigned low probability status where a borough considers that the probability of housing being delivered prior to 2041 is low. Existing approvals for office to residential development will be used as approved sites where these are 0.25 hectares and more in size.

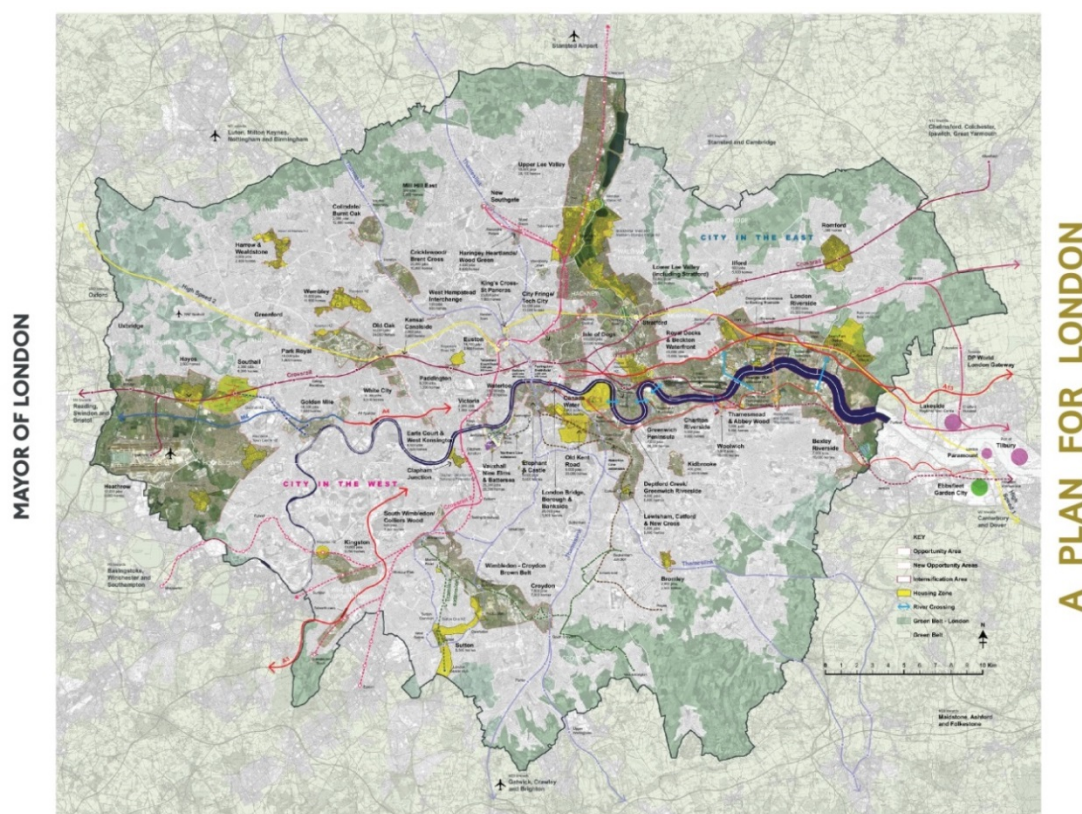
Estate regeneration schemes

- 3.46 Boroughs are able to include large sites included in an estate regeneration programme. As these sites include existing residential dwellings, the SHLAA system allows boroughs to amend net additional housing figures included in the system and by phasing period in order to take into account demolitions and build out rates over time.

Emerging opportunity areas

- 3.47 In addition to the 38 opportunity areas formally identified in the London Plan, a number of emerging opportunity areas being considered and are identified in 'a City for all Londoners'¹¹ These include:

- Greenford
- Hayes - already within Heathrow OA
- the Golden Mile/Great West Corridor
- Kingston (three broad areas including Kingston town centre/Norbiton/New Malden, Tolworth and Chessington)
- Romford
- Wood Green / Haringey Heartlands
- Clapham Junction
- New Southgate
- Wimbledon – Croydon Brown Belt



- 3.48 For the next SHLAA it is recommended that these locations should all be considered as emerging opportunity areas. The boundaries for these emerging opportunity areas are subject to change and will be uploaded onto the borough webmap prior to the site assessments commencing to allow boroughs to review and suggest amendments to the

¹¹ Mayor of London, A City for all Londoners, page 25, Map 3

boundaries where appropriate. As with many existing opportunity areas, a number of these areas are expected to deliver significant employment growth, alongside housing, and this should be recognised in the site specific land use assumptions in the SHLAA.

4 Scenario testing

- 4.1 Given the likelihood that the next SHMA will identify a higher level of housing need than the previous 2013 SHMA study, scenario testing is likely to play an important role in providing the evidence for and testing various policy options for meeting the housing need identified. Unlike during the Further Alterations to the London Plan, the new London Plan is a Full Review and provides the opportunity to test a wider range of potential policy scenarios and options in terms of meeting housing need and balancing this requirement against other important planning policy objectives, such as maintaining the provision of employment land.
- 4.2 In addition, the delivery of key items of transport infrastructure, for example in relation to Crossrail 2 and the Bakerloo Line Extension, will clearly have a significant impact on the delivery, density and phasing of development, as well as land use more generally. The associated housing and employment growth in these key transport corridors is likely to feature as a key policy area for the next London Plan.
- 4.3 Scenario testing will therefore be undertaken with Transport for London and relevant boroughs in order to assess the impact of these schemes in helping to meet housing need through unlocking additional supply. This will also be important in supporting the business case of individual schemes. Such schemes include:
- Crossrail 2
 - The Bakerloo Line extension
 - the extension of Crossrail 1 from Abbey Wood
 - the proposed Metroisation of south London suburban rail network (improved suburban rail services)
 - DLR extension to Thamesmead
 - further extension of the proposed Bakerloo Line extension to Hayes
 - Sutton Tramlink Extensions
- 4.4 The final number of schemes examined will depend on resources and the likelihood of schemes being delivered during the London Plan timescales. The methodology and approach to be taken on these transport corridors will need to be explored in more detail with relevant boroughs during the SHLAA project. This may involve reconsidering potential sites which have been considered unsuitable in the core SHLAA study, but which could come forward if new infrastructure was delivered and land use designations reconsidered, eg industrial land. It will also consider whether sites could come forward at higher densities. The SHLAA system has been designed to ensure there is sufficient flexibility to enable different scenarios to be modelled and tested and for the system rules to be amended.
- 4.5 Other scenario tests which may also need to be tested in the SHLAA study include:
- The potential for increased development and higher residential densities within 'station intensification areas' and within 1km of town centres
 - the various industrial land release scenarios described in paragraph 1.7
 - the potential for suburban intensification

- housing zones and new opportunity areas to be identified in the London Plan

Reasons to delete large sites

- The site is less than 0.25 hectares
- The site was loaded in error, for example a road or waterbody (note that the study aims to assess all potential housing sites. This category should only be used for sites genuinely loaded in error). In addition, boroughs should amend site boundaries where necessary to remove roads or waterbodies or other features that cannot be built on.

5 Sources of capacity outside the large site system

Small sites

- 5.1 As in the 2013 SHLAA, a trend based approach will be used for small sites under 0.25ha. Data from the London Development Database on housing completions from 2004 to 2015 will be analysed and an annual average assumption produced for each borough. This time series will essentially cover a number of market cycles, which should mean the trend based assumptions provide a realistic average for over the plan period and fully take into account local constraints such eg heritage and the availability and viability of sites.
- 5.2 Trend based assumptions on small sites will be based on net conventional housing completions on sites under 0.25ha in size. This will include new build development, change of use and conversions. Trends will therefore take into account change of use from office to residential.
- 5.3 The NPPF states that historic windfall delivery rates should not include development on residential gardens¹². To address this requirement, the previous SHLAA methodology removed 90% of housing completions on garden land. This amounted to approximately 5% of housing delivery on small sites during the timescale examined (2004 – 2011).
- 5.4 For the next SHLAA study, both options will be tested (with and without housing completions on garden land). This will allow alternative policy approaches to be effectively tested and considered, taking into account the particular local circumstances and housing pressures experienced in London.
- 5.5 As stated above, additional scenario testing on small sites will also be undertaken to explore the potential for trends in housing completions in terms of delivery and density to be increased as a result of planning policy changes in the London Plan and Government reforms, for example, the scope for suburban intensification and whether the use of brownfield/small sites registers and permission in principle might increase housing delivery. The methodology and approach to scenario testing small sites 'windfall' assumptions will be developed in more detail at a later date and will be shared with boroughs for comment.
- 5.6 All small site data will be supplied to boroughs in order for them to check the data for accuracy and anomalies. This data will be provided to boroughs prior to Christmas.

¹² NPPF, paragraph 48

Non-self contained housing developments

- 5.7 Housing approvals in the SHLAA system will include net housing provision from non-self contained residential schemes with planning permission where sites are 0.25ha and more in size. This includes student accommodation, specialist housing for older people and also other non-self contained shared living schemes, normally in sui generis use. Some SHLAA sites may be particularly suitable for student housing given their location and setting, and this can be considered by boroughs when assessing potential housing capacity/density.

Vacant homes

- 5.7 The 2013 SHLAA included an estimate for the number of long-term vacant homes expected to return to use between 2015 to 2025. This was based on the expectation that the number of long-term vacant homes will reduce to 0.75% of the total housing stock over this period.
- 5.8 Since 2004 the overall number of long-term vacant homes in London has reduced by half and now accounts for only 0.6% of the total housing stock, with variations at a borough level. Data on long-term vacancy suggests that this is now a local issue for a number of boroughs and not necessarily a strategic issue for the SHLAA to consider in detail, with only 8 boroughs below the previous benchmark (0.75%) used in the previous SHLAA and all but three boroughs below the current London Plan target of 1%.
- 5.9 To inform the methodology for the new SHLAA study, GLA officers have run two tests – one assumes that the number of long-term vacant homes would return to 0.5% of the current housing stock; and another based on the 0.75% figure used in the previous SHLAA. These findings are presented in Appendix B. Following the same methodology as the 2013 SHLAA would result in targets only being applied to 8 boroughs. Using an alternative benchmark of 0.5% would result in targets being applied in 15 boroughs. There are also a number of other issues to consider:
- whilst long-term vacant homes returning to use have made an important contribution to overall housing completions over the past 10 years, data returns show lumpy and unpredictable patterns which have resulted in negative returns for three of the last 10 years, which can have significant monitoring impacts locally
 - the extent that this can be counted as new supply is questionable
 - the data used to monitor vacant homes relies on Council tax records, so trends may illustrate how homes are being classified for Council tax purposes, rather than whether or not homes are actually occupied and the same home could be re-classified a number of times.
- 5.10 Whilst the number of empty homes will continue to be a key Mayoral priority and addressed by policies in the London Plan and Housing Strategy, as well as targeted local interventions, it is recommended that this issue is not considered in the next SHLAA or in terms of monitoring forthcoming targets in the next London Plan.
- 5.11 As part of consultation on the SHLAA the GLA officers are keen to hear from boroughs on how the Mayor's strong commitment to reducing and bringing back into use the number of long-term vacant homes should be addressed through the London Plan and other non-planning initiatives.

Appendix A – London Plan density matrix

Setting	Public Transport Accessibility Level (PTAL)		
	0 to 1	2 to 3	4 to 6
Suburban	150–200 hr/ha	150–250 hr/ha	200–350 hr/ha
3.8–4.6 hr/unit	35–55 u/ha	35–65 u/ha	45–90 u/ha
3.1–3.7 hr/unit	40–65 u/ha	40–80 u/ha	55–115 u/ha
2.7–3.0 hr/unit	50–75 u/ha	50–95 u/ha	70–130 u/ha
Urban	150–250 hr/ha	200–450 hr/ha	200–700 hr/ha
3.8–4.6 hr/unit	35–65 u/ha	45–120 u/ha	45–185 u/ha
3.1–3.7 hr/unit	40–80 u/ha	55–145 u/ha	55–225 u/ha
2.7–3.0 hr/unit	50–95 u/ha	70–170 u/ha	70–260 u/ha
Central	150–300 hr/ha	300–650 hr/ha	650–1100 hr/ha
3.8–4.6 hr/unit	35–80 u/ha	65–170 u/ha	140–290 u/ha
3.1–3.7 hr/unit	40–100 u/ha	80–210 u/ha	175–355 u/ha
2.7–3.0 hr/unit	50–110 u/hr	100–240 u/ha	215–405 u/ha

Notes to Table 3.2

Appropriate density ranges are related to setting in terms of location, existing building form and massing, and the index of public transport accessibility (PTAL). The setting can be defined as:

Central – areas with very dense development, a mix of different uses, large building footprints and typically buildings of four to six storeys, located within 800 metres walking distance of an International, Metropolitan or Major town centre.

Urban – areas with predominantly dense development such as, for example, terraced houses, mansion blocks, a mix of different uses, medium building footprints and typically buildings of two to four storeys, located within 800 metres walking distance of a District centre or, along main arterial routes

Suburban – areas with predominantly lower density development such as, for example, detached and semi-detached houses, predominantly residential, small building footprints and typically buildings of two to three storeys.

Appendix B – vacant potential approaches

	Current total housing stock	Long-term vacant homes 2015	Long term vacants as a % of total stock	Option A - reduce vacants to 0.75% of current housing stock - potential annual target	Option B - reduce vacants to 0.5% of current housing stock - potential annual target
City of London	6,230	44	0.71%	0	1
B&D	73,180	202	0.28%	0	0
Barnet	145,270	1,249	0.86%	11	35
Bexley	97,000	395	0.41%	0	0
Brent	115,600	405	0.35%	0	0
Bromley	136,860	696	0.51%	0	1
Camden	101,650	1,138	1.12%	25	42
Croydon	152,520	1,022	0.67%	0	17
Ealing	130,530	667	0.51%	0	1
Enfield	123,800	817	0.66%	0	13
Greenwich	106,880	504	0.47%	0	0
Hackney	106,750	1,037	0.97%	16	34
H&F	85,270	267	0.31%	0	0
Haringey	106,640	852	0.80%	3	21
Harrow	88,410	97	0.11%	0	0
Havering	100,260	499	0.50%	0	0
Hillingdon	107,460	463	0.43%	0	0
Hounslow	98,790	403	0.41%	0	0
Islington	100,760	953	0.95%	13	30
K&C	86,540	1,289	1.49%	43	57
Kingston	66,410	180	0.27%	0	0
Lambeth	136,260	1,142	0.84%	8	31
Lewisham	122,820	725	0.59%	0	7
Merton	82,710	510	0.62%	0	6
Newham	108,810	1,318	1.21%	33	52
Redbridge	102,650	267	0.26%	0	0
Richmond	83,780	370	0.44%	0	0
Southwark	128,360	930	0.72%	0	19
Sutton	81,240	551	0.68%	0	10
Tower Hamlets	110,790	666	0.60%	0	7
Waltham Forest	100,310	419	0.42%	0	0
Wandsworth	138,840	263	0.19%	0	0
Westminster	121,120	575	0.47%	0	0
TOTAL	3,454,490	20,915	0.61%	152	384

London Borough of Bexley comments on the 2017 SHLAA Methodology

Thank you for consulting us on the draft 2017 Strategic Housing and Land Availability Assessment methodology. The London Borough of Bexley has the following comments.

Overall the Council is concerned at the proposed methodology. It appears as if a somewhat indiscriminate approach is being taken to increasing densities across the piece which could be perceived as being at odds with the existing character of areas or existing and confirmed infrastructure, particularly in a period of reduced financial resources for investment. This would seem contrary to the principles of good planning.

Bexley is committed to working closely with the GLA to maximise the sustainable growth potential of the borough and identifying reasonable housing targets through the SHLAA. However the process outlined requires much greater flexibility to allow local authorities to reflect local circumstances.

Our detailed observations with regard to the density setting process are set out below, and a further note is attached below providing a comparison of Bexleyheath and Erith to other locations in London proposed to be attributed the same character settings and densities within the current draft SHLAA methodology.

- **Designation of Bexleyheath Town Centre as a 'Central' density setting**

It is wholly inappropriate to class Bexleyheath as a central area. It is a distinctly suburban area in terms of character and infrastructure provision.

The town centre boundary is tightly drawn around the retail and commercial core along the historic Roman road (the A207) around which the town originally developed. The area within this boundary fits the description of a central area as defined by the Notes to Table 3.2 in the London Plan 2016, because it includes a mix of different uses, large building footprints and typically buildings of four to six storeys. However, immediately outside this boundary, the character of the area changes dramatically and is much more in keeping with the definition of a suburban area. The distinction between the town centre and the residential areas is stark.



The town centre boundary is tightly drawn around the retail and commercial core of the town

The residential hinterland is comprised nearly exclusively of low-density residential development of detached and semi-detached houses with small building footprints and typically buildings of two to three storeys. Within Christchurch ward, which centres on the designated town centre, over half of residential properties are detached or semi-detached; only around 20 per cent are flats or maisonettes. Barnehurst ward, which also includes part

of the designated town centre, is nearly two-thirds detached or semi-detached and around 15 per cent flatted. The suburban typology is even more pronounced in wards within 1km of the town centre boundaries: St Mary's ward has twice as many detached properties as flats. There are no locations within the town centre itself or within its hinterland with a housing stock comprising anywhere near 75 per cent flats, which is identified by the draft SHLAA methodology as an attribute of the central setting.

There is a distinctly suburban feel to the areas immediately outside the town centre boundaries. They are characterised in the main by long roads of houses of uniform style typifying 1930s suburbia. Elements of the public realm such as grass verges and street trees combine with front gardens or parking to convey an open, spacious character. The majority of streets are exclusively residential, with retail mostly confined to small-scale neighbourhood parades. Even those places which do not conform to this typology still have a suburban feel. For example, the areas of Victorian and Edwardian development include terraced and semi-detached properties often set back from the street. In other areas, post-war suburban in-fill has resulted in some garden-style apartment blocks which tend to be set within open spaces and are no more than three storeys.



The character immediately outside the town centre boundary steps down to low-rise residential, including these semi-detached houses across from the shopping centre and these terraced cottages in sight of the cinema



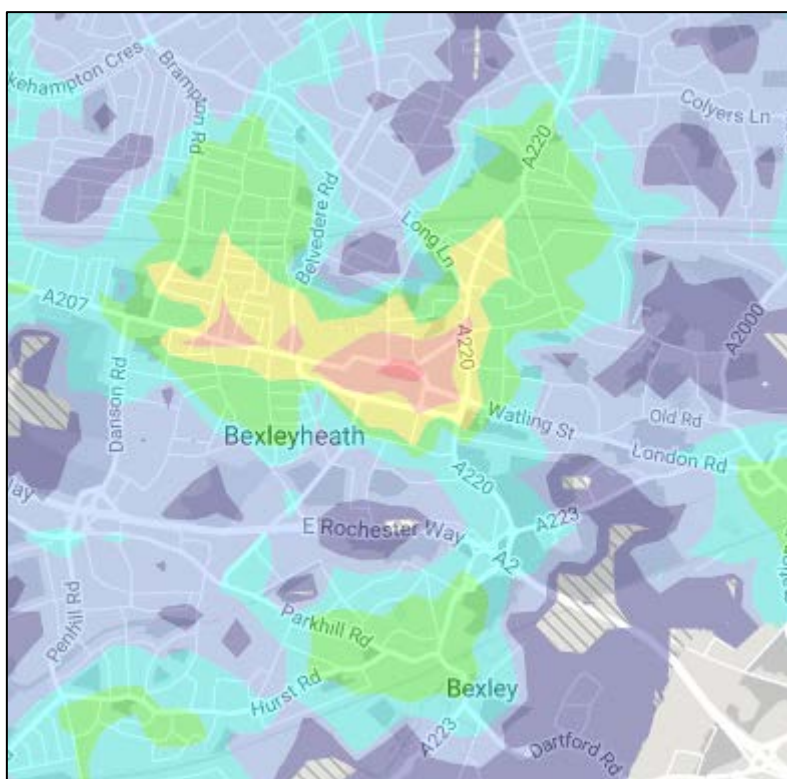
Long and wide streets are lined with houses set back from the pavement to provide front gardens and off-street parking



The housing is predominantly comprised of one- or two-storey detached and semi-detached dwellings with small building footprints

This suburban character is matched by a low provision of transport infrastructure.

Bexleyheath has a high PTAL rating within the town centre but this quickly falls away as one moves from the bus hub at Market Place. Much of the area within 1km of the town centre boundaries has very poor or poor levels of transport accessibility. This is evident even within the immediate vicinity of the town centre. For example, Methuen Road is across the street from the designated town centre boundary but only has a very poor PTAL of 1b. A section of Latham Road, which is less than 200m from the designated town centre boundary, has a PTAL of 0, meaning it is not considered to be accessible by public transport. Even within the designated town centre itself, there are areas with PTALs of 3, indicating only a moderate level of transport accessibility.



The PTAL map shows that transport accessibility quickly falls away from the bus hub

The sharp disparity in accessibility between the town centre and its hinterland is because the high PTAL at Market Place is based wholly on buses. Connectivity is concentrated on a few bus stops which bring together most of the borough's bus network. There are no trams or tubes in Bexleyheath, and the rail stations are located around 20 minutes walk from the town

centre. Areas within 1km distance from the designated town centre boundary are up to 1.5km from the nearest rail station. There are no comparable major outer London town centres with such a high PTAL but with no rail component whatsoever.

Bexleyheath lacks the existing or planned transport capacity to support the levels of housing density that classification as a central area would entail. To presume it will achieve the levels of density proposed without adequate provision of necessary infrastructure is contrary to the basic principle of the integration of land use and transport planning and not in keeping with the principles of Good Growth outlined in the *City for all Londoners* document.

- **Bexley Riverside London Plan Opportunity Area**

The Bexley Riverside Opportunity Area forms the central part of the draft Bexley Growth Strategy which is being worked on with officers from GLA and TfL. The potential development numbers coming out from this strategy are dependent on future major transport schemes coming forward, including the extension of Crossrail eastward of Abbey Wood and a bus or tram based rapid transit route, and could feed into the scenario testing section of the SHLAA.

Automatically upgrading the character setting in Opportunity Areas to the next character level as part of the main SHLAA system would be automatically setting a higher housing figure than is sustainable given current infrastructure commitments. Again we should have the ability to change the density character setting on a site by site basis within the main system, and then use the scenario testing section to look at increased character settings on the basis that major transport infrastructure is in place. This would be in keeping with the propositional planning approach employed within relevant opportunity area planning frameworks.

Also for larger sites delivered over multiple phases, it will be important that we have the flexibility to alter densities through time so as to recognise the potential to increase the intensity of development as relevant infrastructure is secured.

- **General Comments**

Committed Transport schemes: Where it mentioned in the methodology that committed transport schemes are being used to guide the change of PTAL ratings over time, can it be confirmed what these committed transport schemes are?

Strategic Industrial Land (SIL): We await the results of the industrial land research, and the implications this could have on the SHLAA process.

Constraints: Under the 2013 SHLAA process, the Environmental Constraints had a specific constraint around Air Quality, is there any particularly reason why this has not been included as part of the 2017 SHLAA process, particularly as air quality is a particular focus of the current mayor?

Furthermore Under the local constraints, the 2013 SHLAA included an environmental constraint – is this now included within the local infrastructure / contamination constraints?

Small Sites: It is noted that a piece of work is under way regarding the testing of an alternative scenario relating to the future intensification of small sites. Are there any timescales on when this piece of work can be shared with boroughs and will we have an opportunity to comment on its findings?

Furthermore, Bexley would support the previous method used when dealing with development on residential gardens, in that 90% of housing completions on garden land were removed.

Call for sites: On the list of sites sent to Bexley as part of the call for sites is one site actually in Greenwich, 'Land at and to the rear of 132 and 134 Avery Hill Road, New Eltham, Greenwich, SE9 2EY' ID 2073. We assume that the Royal Borough of Greenwich know this site has come forward.

SHLAA Methodology Density Comparisons

The following note compares Bexleyheath and Erith to other locations in London that are proposed to be attributed the same presumed character settings and densities within the draft SHLAA methodology.

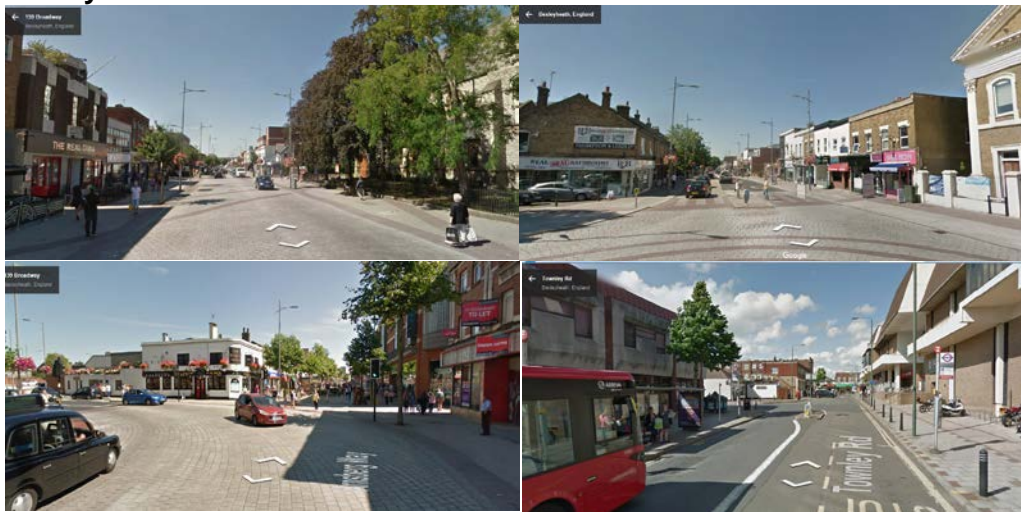
Bexleyheath

Bexleyheath is proposed to have a central character applied to it, extending 1km from the town centre boundary. The map below shows the approximate extent of this area in red. Presumed densities within this area will range from 110 u.p.h to 405 u.p.h.

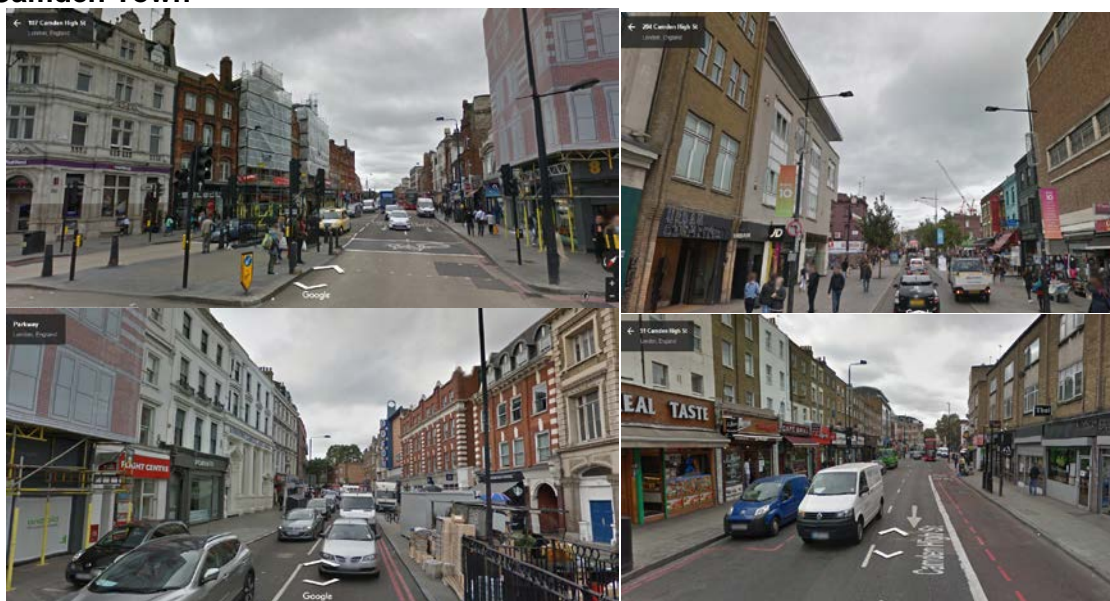


This range is identical to other central locations outside opportunity areas that include large parts of central and inner London. Many of these areas have a very different character to Bexleyheath as illustrated below:

Bexleyheath



Camden Town



Holloway Road



There is also a significant difference in terms of the public transport provision within these areas, despite having similar PTAL levels, as illustrated in the table below:

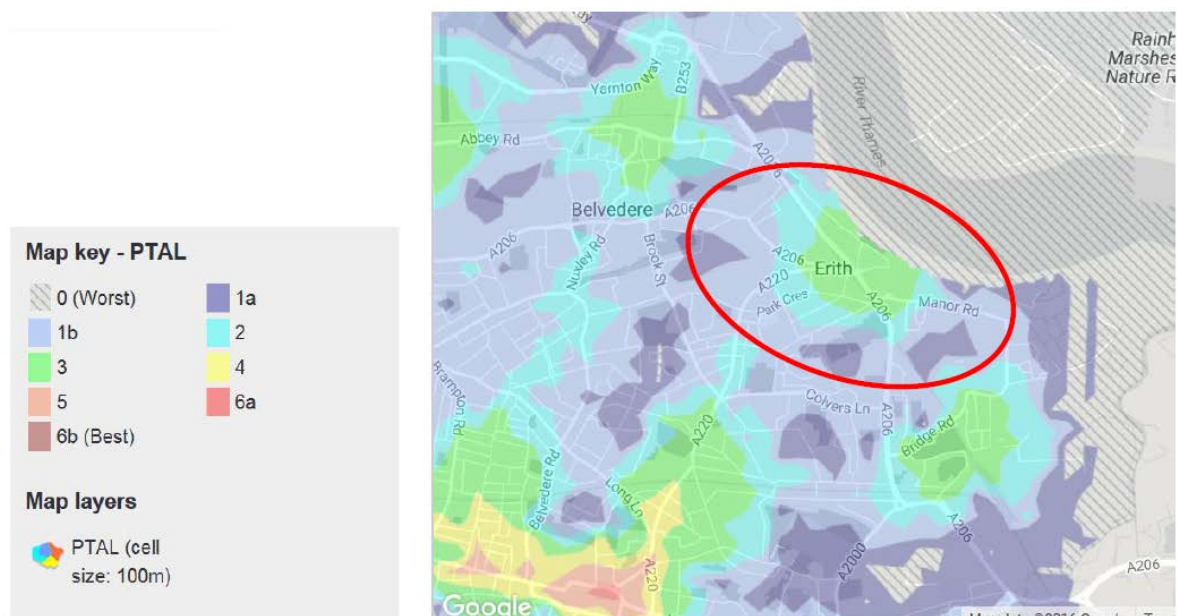
Place/Mode	Bexleyheath	Camden Town	Holloway Road
Bus	16 Routes	12 Routes	12 Routes
Underground	None	Northern Line (Camden Town) North/South 24tph am peak hour/peak direction 20tph south bound off peak	Piccadilly Line (Holloway Road) North/South 24tph am peak hour/peak direction 21tph south bound off peak
Rail	Southeastern (Bexleyheath) East/West 7tph am peak hour/peak direction	Overground (Camden Rd) East/West 8tph am peak hour westbound 6tph eastbound off	Northern City Line Drayton Park North/South 12tph am peak hour/peak direction

	3tph London Bound off peak	peak	6tph south bound off peak
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This high level of connectivity means that both Camden and Holloway have significantly better access to a range of social, community, leisure, recreational and cultural facilities not only in their immediate area but also within central London. For example, journey times to Leicester Square are 8 minutes and 11 minutes from Camden Town and Holloway Road respectively whilst from Bexleyheath the journey would take over an hour.

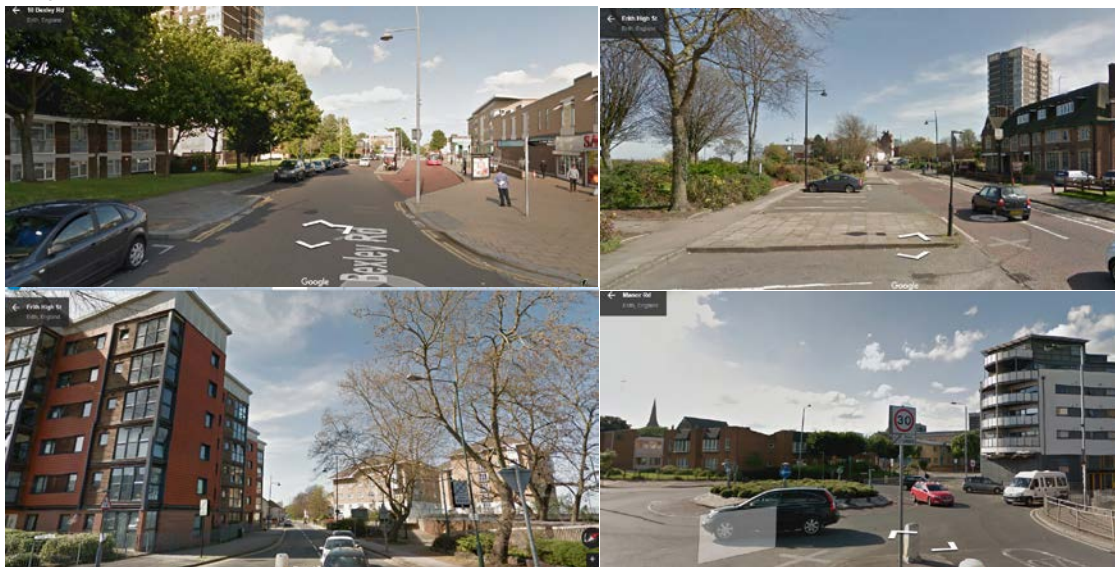
Erith

Through the proposed methodology for Opportunity Areas, Erith town centre will have a central character applied to it, extending 1km from the town centre boundary. The map below shows the approximate extent of this area. Presumed densities within this area will range from 250 u.p.h to 350 u.p.h.



This range is identical to other opportunity areas with a PTAL level of 3 or below including parts of Canary Wharf and the Greenwich Peninsula. These areas have a very different character to Erith as illustrated below:

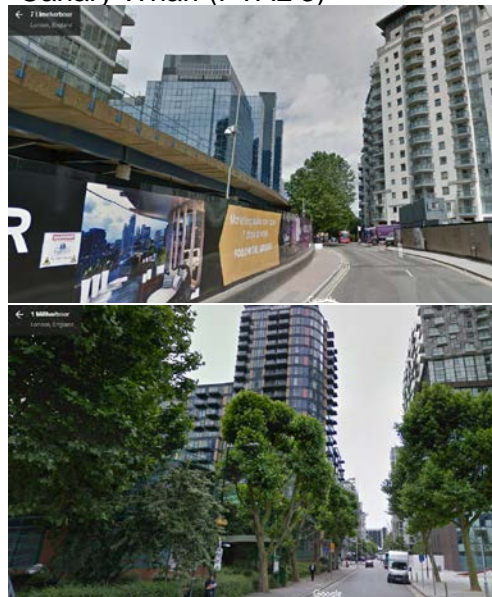
Erith



Greenwich Peninsula (PTAL3)



Canary Wharf (PTAL 3)



There is also a significant difference in terms of the public transport provision between these locations, as lower PTAL areas in both Greenwich Peninsula and Canary Wharf lie very close to high quality public transport services (see table below):

Place/Mode	Erith	Greenwich Peninsula	Canary Wharf
Bus	5 Routes	8 Routes	5 Routes
Underground	None	Jubilee Line (North Greenwich) East/West 30tph am peak hour peak direction 24tph west bound off peak	Jubilee Line (Canary Wharf) East/West 30 tph am peak hour/peak direction 24tph west bound off peak
Rail	Southeastern (Erith) East/West 6tph am peak hour/peak direction 3tph London bound off peak	None	DLR North/South 15tph am peak hour/peak direction 12tph north bound off peak

This high level of connectivity means that both Greenwich Peninsula and Canary Wharf have significantly better access to a range of social, community, leisure, recreational and cultural facilities not only in their immediate area but also within central London. For example, journey times to London Bridge are 8 minutes and 6 minutes from Greenwich Peninsula and Canary Wharf respectively whilst from Erith the journey would take 33 minutes.

Conclusions

The proposed SHLAA methodology, in taking a broad brush approach to the application of character settings and associated densities is in significant danger of undermining local character and overestimating the ability of locations to sustain higher densities, contrary to the principles of good growth. The methodology should allow for much greater freedom to

vary the character settings and associated densities based on local knowledge of place, connectivity and service provision.

[REDACTED]

From: Max Baker [REDACTED]@bracknell-forest.gov.uk>
Sent: 06 December 2016 09:33
To: London SHLAA
Cc: [REDACTED]
Subject: Consultation on London SHLAA Methodology - Response from Bracknell Forest Council

*** This message has been classified as UNRESTRICTED ***

Thank you for the opportunity to comment on the proposed SHLAA methodology

Bracknell Forest has no comment to make on the sources of sites or the approach to densities.

The Council's main concern is over the approach to designated open space and in particular Green Belt, though the same may well apply to one or more of the other designations listed in this category. The reason for giving such land a 0% probability for development appears to be a political statement from the Mayor. This is not a robust approach.

It is not evidence based and no reference is made to evidence of the quality of all the Green Belt or the extent to which it meets the Green Belt purposes in the NPPF. It also fails to reflect the NPPG guidance on SHLAA preparation which states that where constraints exist the assessment should consider what action would be needed to remove them. Such action, it says, could include the need to review development plan policy which is currently constraining development (and would include Green Belt).


It is clearly not a robust methodology to set out that a constraint policy will be maintained at the outset of the process regardless of any up to date evidence to support it. Other planning authorities containing areas of Metropolitan Green Belt are carrying out proper reviews of their Green Belts and in some cases looking to allocate sites within such areas. Unless London can meet all its needs without the use of Green Belt (which does not appear to be the case) it is very important that it also adopts a more robust methodology before seeking to offload its unmet needs on authorities that are taking an NPPF compliant approach.

The approach to industrial land is noted but does not appear to take any account of the effect of the implied relocation of a potentially significant quantum of generally lower grade employment opportunities and the consequent further concentration of higher level employment in the capital on regional inequalities. This is particularly relevant in the light of the recent concerns expressed by the Bank of England chief economist [REDACTED] Haldane about the increasing levels of regional inequality in the UK. There is also no reference to the potential impact on the economic resilience of London that could result from a significant loss of industrial land, though at a regional level this would be compensated for if companies are successfully relocated.

Notwithstanding this general concern, it will be important to ensure that any provision through the re-allocation of industrial land is realistic and reflects the actual availability of specific sites. It should not have the effect of driving employers out of business where they are unable to relocate. There are concerns that the relocation of such employers may be difficult. In this Borough the recent trend has been for the loss of employment sites to residential both through prior approvals and the re-allocation of employment sites through the Local Plan. Our latest Strategic Housing and Employment Land Availability Assessment contains very few proposals for employment land (following repeated calls for sites) and so there is significant doubt about the ability of these employers to relocate to this area. It is appreciated that the picture will vary across the wider region.

We look forward to commenting further on the London Plan as it is developed.

Regards,

Max Baker
Head of Planning
Bracknell Forest Council


Max Baker
Head of Planning
Planning, Transport and Countryside
Environment, Culture & Communities
Bracknell Forest Council

Draft SHLAA Methodology Consultation December 2016 – January 2017

LB Bromley draft comments 30 January 2017

The comments below have been made by the London Borough of Bromley on the draft SHLAA methodology for the next London SHLAA.

Proposed Changes to the SHLAA – comparison of existing and new methodology

1. It would assist all concerned to identify the changes made and the reasons for the changes as part of the new document.

Small sites trend 2004/5 – 2014/15.

2. In previous SHLAA methodologies a time period of eight years has been used to calculate a small site target for boroughs. This has been justified as representing a full cycle and is referred to in the GLA's Housing SPG, paragraphs 1.1.28 – 1.1.31. Extending the time period differs from justifications for an 8 year time period given in previous SHLAA methodologies and GLA advice. It should be noted that completions on small sites for Bromley have declined in more recent years and taking an eight year time period from 2008/09 – 2015/16 would result in a lower overall figure than extending the timeframe to 2004/05. The impact of different assumptions is shown in Table 1 below. This shows how volatile the situation is and that is a practical problem for the 5YHLS.

	2016 London Plan, 2013 SHLAA (8 year assumption 2004/05 – 2011/12)	LBB Draft Local Plan November 2016 (8 year assumption 08/09 – 15/16 prior to small uplift)	12 year assumption 04/05 – 15/16
Annual small site figure (minus garden land up to 2013/14)	352	120	296

Table 1 Comparison of small site figures for LBB – based on small site completions

3. It would be useful for the methodology to expand on its justification for including completed units from office to residential [permitted development] in relation to whether the level of completions to date would be expected to continue.

Garden Land

4. Para 5.3 of the draft methodology notes that in calculating the small sites trend, the previous SHLAA methodology removed 90% of housing completions on garden land. However, Para 5.4 states that for the next SHLAA study, both options will be tested (with and without housing completions on garden land). Given that the small site allowance could take into account completions since 2004, the garden land reduction should still be applied as the trend includes permissions granted prior to the change in definition of brownfield land in PPS3 in 2010. The methodology for the previous SHLAA highlighted that "The NPPF is clear that garden land should not be included in any windfall assumptions". Para 48 of the NPPF states that "historic windfall delivery rates and expected future trends, and should not include residential gardens." Further consultation with

boroughs may be necessary depending on the outcome decided upon by the GLA. This is referred to in part in paragraph 5.5 and is welcomed.

5. A significant part of Bromley's current annual monitoring target is made up of the small sites element. In relation to the annual compilation of a five year housing supply paper the London Plan advises in paragraph 3.19A that the 'windfall' element must form part of the 5-year supply. This advice is reiterated in paragraph 1.1.28 of the GLA's Housing SPG. The Borough's Five Year Housing Supply Paper June 2015 incorporated the small site element (352 units per annum) in its calculations in line with the latter advice. It was considered that in light of the London Plan having only recently been adopted at the time [and the SHLAA methodology having been endorsed] it would be appropriate to incorporate the small site element.
6. This was tested extensively at a public inquiry in May 2016 but the Inspector did not agree with the Council's position. For information, a copy of the relevant Inspector's decision letter is attached and the small site windfall element is dealt with in paragraphs 22-25. In summary, the Inspector considered that more recent data on small site completions should have been taken into account, over an eight year period, in calculating the windfall figure (i.e. 2012/13 – 2014/15) as opposed to relying on the average figure derived from the GLA SHLAA 2013 (352 for the Borough). In doing so the windfall figure would reduce significantly in light of small site completions falling in recent years resulting in the Council not having a five year housing land supply.
7. In light of the above it is imperative that boroughs do not have a small site target that is unsustainable, especially as the advice is that the windfall element should form part of the five year housing land supply. It is accepted that recent data should be used when calculating a windfall figure for a five year housing land supply position but if completions on small sites have reduced in previous years this should be reflected in a lower annual target for that particular year. Alternatively, boroughs are pressurised to achieve annual targets through completions on large sites that could include designated land. Further advice should therefore be given in relation to the latter circumstances to assist with monitoring and five year housing land supply compilation.

Brownfield/small sites registers

8. LB Bromley would like the opportunity to comment on this at a later date once the methodology for undertaking this assessment has been shared with boroughs

Industrial Land research

9. LB Bromley would like the opportunity to comment on housing capacity estimates on industrial sites should the approach to industrial land release be changed. Concerns are currently raised over the probability assumptions for Locally Significant Industrial Sites and non designated industrial sites (40% and 45% respectively) as these seem too high for a restricted borough.

Confidentiality of potential sites

10. LB Bromley agrees that the site specific information on all potential sites in the SHLAA should remain confidential.

Density estimates

11. LB Bromley does not agree with the approach taken towards the density estimates for allocated and potential sites. It is considered that the boroughs should be given more flexibility to allow them to take account of the local context and character of the surrounding area. It is accepted that the density figure can be a starting point when considering the density to apply to a potential development site in the SHLAA, and the need to optimise the development of a site is acknowledged. However, the lowest standard density range in a suburban area with a PTAL of 1-2 is set at 65dph which is much higher than the average density of development approved in the borough as a whole in the last 6 years

	2009/10	10/11	11/12	12/13	13/14	14/15
Bromley	49	52	35	40	30	39

and also higher than the average density of completions in the borough as a whole in the last 6 years.

	2009/10	10/11	11/12	12/13	13/14	14/15
Bromley	30	49	46	48	31	44

(Source - London Plan Annual Monitoring report 12)

12. The character settings feed into the potential development density, however it is noted that boroughs will not be able to change the character settings in the system. LB Bromley does not agree with all character settings given to the borough. It is therefore considered that more flexibility should be given to outer London boroughs such as Bromley to amend the density. The figures in the London Plan AMR demonstrate that the density of development in Bromley which has been permitted and also completed in the last 6 years is the lowest of all London boroughs which reflects its existing character, context and low PTAL areas.
13. The higher density assumptions for opportunity areas are noted. Bromley Town Centre is designated as an opportunity area and much work has been carried out on the sites within the town centre - some of these sites form site allocations within the proposed submission local plan. LB Bromley therefore welcomes the opportunity to use the existing work that has been carried out in assessing these sites already by the borough to inform the density of these sites.

Designated open space

14. LB Bromley agree that all designated open space should be classified as unsuitable in the system and deemed to have a zero percent probability for development. It is also acknowledged that boroughs will be able to classify other protected public or private open space identified on the borough proposal map as unsuitable and we shall need to do this for the Local Green Spaces which are proposed in our draft Local Plan.

Beyond London

15. Is there any linkage with SHLAA exercises beyond the boundaries of London?

Transition from London SHLAA to Development Plan policies/allocations and 5YHLS at London and borough levels

16. As the SHLAA methodology approach is largely 'probability' based and particularly where there is a high proportion of supply relying on small sites, the methodology should cover the steps from the current SHLAA 'output tables' to the housing land supply statements in more detail.

Monitoring

17. (Links to Former Dylon Appeal also – please see above). This is part of the SHLAA according to the PPG. There should be more emphasis on 'what if' scenarios post publication of the SHLAA. For example if small site completions are less than projected, should we alter the annual average policy target to reflect the change in completions?

Lapse rates

18. It would be useful for the methodology to set out how lapse rates will be taken into account in the Assessment and future monitoring of completions, especially on large sites. In some cases developers may argue for an 'over provision' of sites to account for any sites slowing down or lapsing. It is observed that in the circumstances of London and the GLA SHLAA there is a 'probability' approach to availability that reflects and accepts the difficulty of identifying all sites at any one moment in time. We should therefore accept that in some circumstances, unexpected large sites will come forward and offset lapsed sites – this should be 'in built' in the SHLAA.
19. Of importance, Table 3.20 of the 2013 SHLAA has been used in recent appeals / public inquiries by appellants to justify high lapse rate suggestions (i.e. 40% plus for sites with planning permission not commenced) with the aim of justifying Green Belt / MOL release and high densities. For example the lapse rates suggested by appellants have reflected the differences between planning permissions granted and completions. It is considered that it was not the intention of the 2013 SHLAA for the table to be used in this context. Any feedback from the GLA in relation to this would be welcomed.

If such tables are included in future SHLAAs further elaboration in this respect would be welcomed in the final document.

Components of availability

20. When the final SHLAA is published, it would be helpful if it contained a single list for each borough of all of the components of the capacity figure. For example; large sites, small sites, and other elements of supply.

C2 uses

21. Further advice should be included in relation the contribution that existing and proposed C2 sites can make. If an existing C2 use is redeveloped for C3 housing there could potentially be a net loss of units and advice on the relevant timescale of vacancy would be useful. For example, if a C2 use has been vacant for 6+ months a loss might not be applied if the number of bedrooms exceeds the

proposed number of self-contained units. Additionally, are we able to take any C2 provision of residential accommodation into account?

Appeal Decision

Inquiry held on 24 – 27 May & 2 June 2016

Site visit made on 27 May 2016

by Katie Peerless Dip Arch RIBA

an Inspector appointed by the Secretary of State for Communities and Local Government

Decision date: 02 August 2016

Appeal Ref: APP/G5180/W/16/3144248

Land to the rear of former Dylan International Premises, Station Approach, Lower Sydenham, London SE26 5HD

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a failure to give notice within the prescribed period of a decision on an application for planning permission.
 - The appeal is made by Mr Iain Hutchinson against the Council of the London Borough of Bromley.
 - The application Ref: DC/15/04759/FUL1 is dated 30 October 2015.
 - The development proposed is demolition of existing buildings and redevelopment of the site by the erection of a part eight, part nine storey development comprising 253 residential units (128 one bedroom, 115 two bedroom and 10 three bedroom) together with the construction of an estate road and ancillary car and cycle parking and the landscaping of the east part of the site to form open space accessible to the public.
-

Decision

1. The appeal is dismissed.

Main Issues

2. Since the appeal was lodged, the Council has indicated that, had jurisdiction not passed to the Secretary of State, it would have refused the appeal on a number of grounds. Taking these into account, I consider that the main issues in this case are as follows:

The effect of the proposed development on

- (i) the area of Metropolitan Open Land (MOL) in which it would be located, in particular whether it constitutes inappropriate development and, if so, whether there are any material considerations that outweigh the harm caused by inappropriate development in the MOL, and any other harm, sufficient to justify the proposal on the grounds of very special circumstances.
 - (ii) the character and appearance of the surroundings, with particular reference to the quality of its design, especially in relation to its scale, form, density and the measures taken to mitigate the risk of flooding;
- and
- (iii) the amenities of the future occupiers of the dwellings with particular reference to natural ventilation and solar gain and noise.
-

3. Although the Council was initially concerned that the proposed development would not meet its requirements in terms of numbers of apartments with wheelchair accessibility, further information submitted at the Inquiry resolved this question and the Council withdrew its objection on this ground.

Site and surroundings

4. The appeal site is part of former industrial premises and was previously a sports ground for the employees. It is roughly triangular in shape and is bounded to the west by a railway line and to the north east/south west by the river Pool. It contains the remains of a number of disused buildings associated with the sports ground use and areas of hardstanding. A part of the site is presently being used as a temporary compound associated with the development of the remainder of the former works on the land to the north and there is also an enclosed compound in a commercial use to the south but the remainder is mostly now rough grass with a track running close to the river from north to south.
5. The site lies within the New Beckenham area of Metropolitan Open Land, most of which comprises other sports grounds and playing fields. All of these areas are also part of the Green Chain. Beyond the railway, to the west, lies an industrial estate with residential development in Copers Cope Road and Worsley Bridge Road to the east. Lower Sydenham Station is close by, to the north.

The appeal proposals

6. The proposed development consists of 253 apartments in a single, articulated block on a north/south axis adjacent to the railway line. An access road with on-street parking would run parallel to the railway line and further parking space would be located in a basement beneath the building. This would allow the first level of residential accommodation to be raised and so prevent flooding should the river level rise. Water would be allowed to flow in and out of the car park via a series of grilles set into a landscaped area to the east of the block.
7. The remainder of the site would also be landscaped into an area of recreational parkland accessible to the public, containing an outdoor gym and a children's playground, with parking spaces to the north.
8. The scheme has been designed by the architect of the adjacent residential development on the site of the former works and would have a similar palette of materials, including yellow London stock brickwork, ribbed translucent glazed panels to the circulation cores and recessed balconies. The block would have 10 storeys, including the basement, and be set out in a 'zig-zag' shape along a central spine, with 7 facets on each long elevation, set at an angle of 120°. The apartments are a mixture of studio, two and three bedroom units, each with at least one balcony or private terrace.

Reasons

9. There is no dispute between the parties that the site lies within MOL or that policy 7.17 of the London Plan (LP) gives the same protection to such areas as is given to Green Belt in national policy as set out in the National Planning Policy Framework (the Framework). It is therefore also agreed that the

proposed development would be inappropriate development which would be inherently harmful and consequently only acceptable if shown to be justified through the existence of very special circumstances.

10. One of the main differences between the parties centres on the weight to be accorded to the MOL policies and the other Development Plan (DP) policies relating to housing land supply (HLS), with the Council considering that it can demonstrate a 5 year supply of housing land to meet its objectively assessed need (OAN). The appellants, however, submit that the claimed supply, at 5.1 years, is an over estimation and that there is a shortfall in the 5 year supply. This would mean that the policies relating to the supply of housing would be considered out of date and paragraphs 49 and 14 of the Framework would consequently be engaged.

Housing Land Supply

11. I consider that the starting point for this case is therefore whether the Council can demonstrate a 5 year HLS. The parties have produced a Statement of Common Ground (SoCGH) on the topic which sets out the areas of agreement, and disagreement, between them. It is agreed that the base date for calculating the supply is 1 April 2015 and that the annual housing target for the Borough as set in the Further Alterations to the London Plan (FALP) is 641 dwellings per annum (dpa) to which a 5% buffer should be applied to ensure variety and availability of choice. This gives a figure of 673 dpa for the period 2015 – 2020; a total of 3365 units.
12. The Council, in the SoCGH, considers that it can demonstrate a supply of 3443 units or, if it is considered that a 5% lapse rate (as discussed below) is applied to known sites with planning permission, 3403 units. This equates to 5.1 or 5.05 years' supply respectively. Taking all the reductions suggested by the appellants' results, in the worst case scenario, to a supply of 2480 units or 3.68 years HLS.
13. The matters in dispute between the parties are limited to the following points: firstly the position on 3 sites where the numbers of units that will be delivered are not agreed, secondly, the number of windfall sites that should be included per annum and thirdly, whether lapse rates should be applied to the categories of 'known sites with planning permission not commenced' and 'other sites', which are included in the 5 year supply figures.
14. Of the 3 sites in dispute, the first, Sundridge Park Manor, is considered by the Council to be capable of delivering at least 14 dwellings. The site has planning permission for this but the developers have stated that this level is unviable and will not be built out. The appellants suggest that, for this reason, the site should be removed from the list. The developers also applied to build 22 dwellings on the site but the revised scheme was refused permission at a planning committee meeting on the evening of the day the Inquiry closed, despite an officer's recommendation for approval.
15. It seems to me that, in these circumstances, the future of the site is very uncertain and it would be imprudent to assume that any units might come forward within the 5 year time frame. This means that 14 units should be deducted from the Council's total.

16. A site at Tweedy Road is being released by the Council for development with design guidance indicating that 24 units are likely to be acceptable. The appellants consider that it is a sensitive site that is not suitable for the scale of development originally envisaged, i.e. 40 units, and should be removed in its entirety. The site is now being actively marketed by the Council and, given the design studies carried out, I see no reason why the number of units included in the SoCGH calculations should not be deliverable within the 5 year time scale.
17. The final site is the former Town Hall and car park that was granted planning permission for 53 units in November 2015, after the base date of 1 April 2016. The appellants submit that the appropriate estimate is the 20 units envisaged at the base date, whereas the Council considers that the latest position should be the one on which the figures are based.
18. Whilst there is more up-to-date information now available, it seems to me that if additional units granted planning permission after the base date are to be taken into account, so should any units that have been completed after the base date and consequently removed from the future supply availability, in order to present the most accurate overall picture. This exercise had not been completed for the Inquiry and I therefore conclude that for the purposes of this appeal, the position as agreed in the SoCGH should be adhered to.
19. In conclusion therefore, on this topic, I consider that 47 units¹ should be taken out of the total of allocated sites and other known sites that the Council consider to be deliverable in the table attached to the SoCGH.
20. Turning to the number of windfall sites that should be included, the Council rely on the figures which were informed by the Strategic Housing Land Availability Assessment (SHLAA) carried out in 2013 and based on the years 2004 - 2012. However, the appellants point out that this was a measure of capacity and does not necessarily reflect the actual rate of delivery of sites.
21. At the Examination in Public (EiP) into the FALP the Inspector found that it was likely that it would not deliver sufficient homes to meet London's OAN but non-adoption would result in the retention of the existing housing targets, which were even lower than those in the FALP. In those circumstances, he concluded that the FALP should be adopted but subject to an immediate review, with the clear intention of increasing the supply across all forms of delivery.
22. The Council considers that any review of the likely level of windfall sites should wait until the next SHLAA is carried out, but, given the situation set out in the EiP Report into the FALP, I disagree. There is now more recent data available which demonstrates that the availability of such sites has reduced in the 3 years since the SHLAA was published and given the FALP Inspector's conclusions on the need to increase delivery, even though capacity might be sufficient, I consider that the windfall allowance suggested by the Council is unrealistic and should be reduced.
23. At present, the Council has included a total of 1100 units (220 dpa) in its small sites allowance for windfalls for the relevant 5 year period which equates to about 1/3 of its housing requirement. The total from all small sites is set at 352 dpa in the Council's calculations, but this figure has not been achieved in the Borough since 2007/8, with the overall trend for such completions moving steadily downwards.

¹ 14 from the Sundridge Park Manor site and 33 from the former Town Hall site

24. The level of reliance on 'unknown' sites has been criticised in the past by Inspectors and the appellants suggest that the 5 year trend figure of 1330 units from small sites over 5 years, resulting in 742 windfall dwellings over the period would be a better estimate. This figure is based on actual completions and it has been previously agreed by the Borough, in its evidence to the FALP EiP, that about 1800 small sites over the period 2015 - 2025 would be a more realistic figure.
25. Given the downward trend, and even taking a conservative figure midway between the 1100 now supported by the Council and its previous prediction of 900 (over 5 years) suggested as achievable at the EiP, would mean that the Council would narrowly miss the 5 year HLS target.
26. Even if this were not the case, the Council has made no allowance for any lapse rates on sites where planning permission has already been granted but not yet commenced. It has agreed, through the Inquiry process, that a 5% rate could possibly be applied to such sites, if found necessary, and this on the Council's own calculations would bring the HLS down to 5.05 years, as noted above.
27. The appellants submit that a lapse rate of between 30 – 50% should be applied to these sites and also to 'other known sites' where planning permission has not yet been granted. This view is based on the findings of previous Inspectors who were concerned that a 100% delivery rate was unrealistic and a variety of other evidence, including the 2013 SHLAA and comparison of delivery rates against Annual Monitoring Reports (AMR).
28. The figures show that there has been an overall failure to achieve the projected completions and while there are some years where targets have been met, the overall trend is a shortfall of up to 50%. It therefore seems to me that a lapse rate should be applied, to give a more accurate picture of what is likely to be achieved in terms of actual completions and that figure should be higher than the Council's assumed 5% and applied to both categories.
29. Even if a lapse rate of only 6%, rather than the 30 – 50% suggested by the appellants, were to be applied to the sites with planning permission that have not commenced and to other known sites as adjusted as set out above, the 5 year HLS would not be met. This would be the case even if the Council's figure on windfalls were to be accepted. I have however, for the reasons set out above, concluded that this would be an unreliable estimate.
30. I therefore conclude that, on the figures used to inform the agreed position on the SoCGH, the Council cannot demonstrate a 5 year supply of deliverable housing sites and, for the purposes of this appeal, the policies that are relevant to the supply of housing are not up-to-date.

Metropolitan Open Land

31. The designation of MOL is linked to that of Green Belt in national policy and both parties agree that the policies in respect of it are relevant to the supply of housing. My findings on the HLS situation therefore mean that they are now out-of-date and that, while they are still part of the DP for the Borough, the weight that can be accorded to them is consequently reduced.

32. The appellants also submit that, in this situation, the MOL designation is a local one, related only to the LP, and does not therefore fall within footnote 9 of the Framework which relates back to paragraph 14. This paragraph notes that where relevant DP policies are out-of-date permission should be granted unless any adverse impacts would '*significantly and demonstrably outweigh the benefits*' when assessed against '*the policies in this Framework as a whole*' and '*specific policies in this Framework*' indicate that development should be restricted.
33. Footnote 9 cites Green Belt as one of these specific policies. The appellants maintain that every word in the Framework is important, carefully considered and should be read as written and that therefore, because MOL is not mentioned in the Framework, there are no policies relating to it therein and paragraph 14 is not engaged in respect of the designation.
34. The Council disagrees, submitting that the Framework refers to national policy only, with MOL being a local designation that relies on the LP for its association with Green Belt policy and this is why it is not mentioned in the examples given in footnote 9. It submits that this does not mean that MOL policy is not covered by, or is inconsistent with the Framework; rather the Green Belt policies of the NPPF nevertheless apply by analogy to MOL by virtue of the references to it in the adopted DP which includes the LP.
35. However, I consider these arguments to be somewhat academic in this case. Whether or not MOL is a 'specific policy' in terms of footnote 9, it remains part of the adopted DP, through the up-to-date LP, and triggers the need to identify very special circumstances if planning permission is to be granted. In any event, the appellants do not dispute that 'very special circumstances' will need to be found here. To this end, they submit that the Framework clearly infers that significantly less weight should be accorded to policies that are found to be out-of-date and have made their submissions on this basis and that very special circumstances apply that are sufficient to justify the scheme.
36. To this end, the appellants also question the extent to which the appeal site is contributing to the purposes of its MOL designation. To be designated as MOL, LP policy 7.17 requires it to meet one of the following criteria. It should contribute to the physical structure of London by being clearly distinguishable from the built up area, it should include open air facilities for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London, or it should it contain features or landscapes of either national or metropolitan value.
37. The last 2 criteria are not met as there is no public access to the land and no features that meet the description. It is the case that the land is not clearly visually linked with the playing fields to the east of the Pool river from any of the viewpoints visited during the site inspection and, at the time of that visit when the vegetation was at its thickest, the extent of the wider MOL was not readily apparent from the site itself. Nevertheless, I accept that this may be somewhat different when the leaves are off the trees, as seen in photographs of the site. In any event, the site nonetheless makes a contribution to the larger open area through the fact of its designation and, as with land in Green Belt, the extent of visibility of the site does not necessarily reduce the importance of the contribution that it makes. It is 'openness' that is the critical factor, with visual impact being judged under different criteria.

38. However, I would disagree with the finding of the Greater London Authority (GLA) in its advice on the proposal that the site is '*clearly distinguishable from the built up area to the north*' or that it '*connects with a wider network of open space*'. There is no link across the river and the site is surrounded by dense development on all other sides. It is only really in the aerial photographs that the site can be clearly linked to the open land around it. For these reasons, I find that the contribution that the site is making to the MOL designation criteria is not as significant as the adjacent sports fields beyond the river and the harm caused by the proposed development to the MOL will be considered in the light of this finding.
39. There is already some development in the form of single storey buildings and hardstanding used for commercial storage on part of the land. The footprint of the new block and its related development would cover about 44- 48% of the site, compared to the area of 'brownfield' land which is about 37% of the total at present. Although the GLA appeared to believe that some of the development on the site was unauthorised, there was no suggestion made at the Inquiry that this was the case or any challenge to the planning status of the previously developed land.
40. The appellants were at pains to point out that loss of openness is to be distinguished from visual impact and that, in their view, openness is lost once land ceases to be free from development and the height or bulk of the development is not relevant to an assessment of the extent of this loss. The impact of the scale of the development should therefore be judged through a separate visual assessment and they maintain that land that is previously developed already has lost its open status for the purposes of MOL policy and any additional development on such land should not be 'double counted' when the extent of any harm is being assessed .
41. I agree that the concepts of openness and visual impact are distinguishable and that the difference between the existing and proposed percentages of developed footprint on the site, at 11% at most, is relatively small when set against the wider expanse of MOL of which the appeal site is part. Nevertheless, there is no dispute that the proposed development would result in a loss of openness and this loss would be clearly discernable from wherever the new block could be viewed.
42. However, the weight to be given to this harm is reduced because, at local level, it is a relevant policy for the supply of housing and I have found there to be no 5 year HLS. Nevertheless, there is still a considerable amount of undeveloped land that would be lost from the MOL and if considered on the same terms as Green Belt policy, the Framework makes clear that substantial weight should be accorded to any harm to the MOL. In this case therefore, I consider that, while the harm caused by inappropriate development and loss of openness may be tempered by the relevant policies being out of date, it is still a considerable factor weighing against the proposal.

Design

43. The architect for the proposal is well known and respected and has explained his design rationale for the proposal in detail at the Inquiry and in his proof of evidence. The scheme has also been considered by independent architectural experts on behalf of both main parties.

44. They come to differing conclusions with the Council criticising the design of the development on several grounds, including its scale, bulk and detailing, its relationship to the public realm and surrounding development and the amenities that it would provide for the occupants.
45. The Council believe that the building would have a poor relationship with the public open space to the east through being set at a higher level on this elevation to allow for the flood defences. It also considers that it would be overly large in its context and that it would appear featureless, lacking the interest created by the varied roofline of the other part of the former Dylon land, referred to hereafter as 'Dylon 1' scheme.
46. Criticism is also made of the internal layout, based on the submissions that there would be minimal natural light available to the internal corridors, that there would be too many single aspect dwellings and that reliance on artificial ventilation to ensure that noise levels in the west facing units indicates poor design.
47. The appellants' expert disagrees, submitting that the building would provide a graduated link between the public and private areas and that would appear as a well-considered and appropriate response to, and continuation of, the Dylon 1 scheme. The constant roof line is said to be 'calm' and the geometry of the scheme is said to ensure entrances are clearly visible. It is also claimed that the quality of the internal amenities could be controlled by conditions to ensure that noise and ventilation levels were satisfactory.
48. Having carefully considered these contrasting views, I consider that the design of the building, taken in isolation, is indeed a meticulous and finely detailed concept that would reflect that of the Dylon 1 scheme. I find no problem with the integration of the flood protection measures into the layout, considering that they would be discreet and well integrated into the landscape proposals. Similarly, the 'podium' layout objected to by the Council would, I consider, be an appropriate method of providing private open space that is clearly separate, but not isolated from the park or access way, providing a link of at an appropriate human scale between the public and private realm at ground floor level.
49. Nevertheless, I am not persuaded that the relationship with the Dylon 1 site is the most important in this situation. That site is not within MOL and whilst its character is a factor that must now be taken into consideration in the design of any development on the appeal site, the proposed new block would, I consider, be of an overly dominant height when seen against the relatively small scale development on, and open nature of, other surrounding land.
50. The appeal scheme would maintain a uniform roof level and would be one storey higher than the top floor level of the Dylon 1 buildings, the bulk of which are then reduced as they step down towards the north. However, the remainder of the surrounding development is a mixture that includes industrial and commercial uses, generally at no more than 2 storeys high, the sports grounds that comprise the remainder of the MOL and suburban residential streets where development does not generally exceed 4 storeys at most, with much of it being limited to 2 storeys.

51. In this context, a building of 10 storeys and of the length proposed would, I consider, create a hard dominant edge that would be better suited to a more central urban area where the surrounding densities are more comparable. The constant height of the block would convey the impression of it being considerably larger than Dylon 1, which, as has been noted, is outside the MOL.
52. While the argument has been made that if development is to take place, it should deliver the highest density possible, it seems to me that if development is to take place that would effectively remove some of the designated MOL, it should be more closely aligned with the generally open nature of the remainder of the land within this designation and the suburban and less densely built-up character of the majority of the land adjoining it.
53. I noted at the site visit that the accurate visual representations presented by the appellants, while being a faithful reproduction of how the proposals would sit in the landscape nevertheless do not appear exactly as they do to the human eye when standing in the position from which the photographs were taken. In reality the site appears closer and the proposed buildings would look consequently larger when seen from surrounding roads. The impact of the scale of the development would therefore be greater than depicted in the illustrations.
54. The provision of the park in what is, at present, underused and neglected land is very welcome and would serve not only the residents of both Dylon schemes but would be open to other visitors. I am not persuaded that it would appear as private space for the blocks; local people would, I am sure, soon realise that it was open to all to use and would appreciate having a landscaped area adjacent to the river in which they could walk, exercise and take their children to play.
55. However, I am also of the opinion that the proposed building would be excessively high when seen from, and in relation to, the park and would have the effect of enclosing it, so that the open land would appear dominated and overlooked by the block. The sense of space would be diminished and the appreciation of the remaining areas of MOL within the site, and beyond where available, would also be reduced. The building would appear as a solid wall of development, despite the angled façades, with little variation along its length to relieve its somewhat monumental character.
56. It would be visible from a considerable distance and be prominent on the skyline, from where it would clearly be seen as one block despite the articulation of the elevations. There is no objection *per se* to seeing an attractive building in a location where previously there was little development, but in an area where specific protection has been accorded to the openness of the surroundings, I consider that particular care should be taken to ensure that any change does not appear overly bulky or higher than absolutely necessary.
57. The Planning Design and Access statement that accompanied the application comments as follows on the scale of the development: *'In determining an appropriate scale for the development regard has been had to the topography of the site; the relationship with and scale of the approved adjacent Phase 1 development; and the need to use scarce land resource effectively and efficiently.'*

58. It goes on to say: *'The proposed massing aims to optimise the potential of the site in terms of light, views and accessibility while being sensitive to the form and scale of its context. The massing is urban; however, the architectural articulation of the elevations with the rhythm and proportion of the windows gives the buildings a domestic scale.'*
59. Whilst the aims set out above are appropriate and the massing of the block is indeed urban, for the reasons set out above I am not persuaded that this is necessarily an acceptable solution for this predominantly open site set in a largely sub-urban townscape or that the building would in any way have a 'domestic scale'. It would be impressive and massive but these are not the qualities that I feel are suitable for a site such as this and the scheme would consequently fail to relate sympathetically to the open space within and beyond the site boundaries across which most views of it would be achieved. Whilst it would continue the theme of the Dylon 1 development, I question whether this would be the correct template to follow, given the difference in designations between the 2 sites.
60. Turning to the question of residential amenity, whilst the majority of the units would span the full width of the block and consequently have a double aspect that would include the proposed park from at least some of the windows, I am nevertheless somewhat concerned about the number of single or limited aspect flats on the western elevation.
61. Each floor above ground level would have 6 units that faced only the railway, with another 2 having additional windows looking north or south, but not across the park. It is also the case that it is the units closest to the railway, at the points where the angled façades meet, which would have this limited outlook, as well as being closest to the source of most noise. Whilst mechanical ventilation and noise reduction measures could help to maintain minimum standards I am still concerned that this is a design flaw that results from an attempt to increase densities to more than could be comfortably accommodated on the site.
62. If permitted, the appeal scheme is likely to be used as a precedent for the character of the surroundings against which any future development of nearby sites would be judged. I am concerned that this could lead to a concentration of high rise development that would fail to make an appropriate transition between the open playing fields and sub-urban characteristics of the residential development to the east and the more commercial and urbanised areas to the north and west.
63. In conclusion on this topic, I consider that the extent of the proposed development on the site would be excessive, given the designation of the site and the impact on the character of the surroundings. I find that the scheme would not respect the character and appearance of its surroundings because of its overly dominant height and scale. It would thereby conflict with the policies set out in Chapter 7 of the Framework which seek to promote and secure good design that would help to raise the standards in the area.
64. I consider that the proposal would also fail to meet criterion H7 (iii) of the London Borough of Bromley Unitary Development Plan 2008 (UDP) which requires, amongst other things, that the site layout, buildings and space about buildings are designed to a high quality and recognise, as well as complement, the qualities of the surrounding areas.

65. Similarly UDP policy BE1 calls for all development proposals to be of a high standard of design and layout and they are expected to meet a number of criteria that include complementing the scale, form, layout and materials of adjacent buildings and areas. For the reasons set out above, I conclude that the scheme would be in conflict with this policy as, although it would be seen as clearly related to the Dylon 1 development, it would still fail to complement the wider context in which it would be set.

Very special circumstances/the balancing exercise

66. I have found that the Council does not have a 5 year HLS and the provision of 253 new units, including 90 affordable units, is a significant benefit of the proposal. In addition to this, the economic benefits that would result from the building of a project of this scale are considerable.

67. The public park is another factor that weighs in favour of the scheme and the biodiversity improvements and provision of a possible link to the Waterlink Way would also add to the benefits. The housing delivery grant would, of course, be an advantage but the infrastructure contributions cited by the appellants as benefits are required to make the development acceptable in any event and do not add to the balance in favour of the scheme.

68. I do not accord any additional weight to the fact that the appearance of the site would be improved. This is because, as with Green Belt policy, the condition of the land is not a contributory factor in the designation; it is the openness of the MOL that is important in this context.

69. While the building might, in other location, be considered a valuable addition to the townscape, for the reasons set out above I do not find its relationship with its surroundings would be of sufficient architectural quality to be a consideration in its favour. Indeed, my concerns about the scale and massing of the block, together with the quality of the accommodation for some of the future occupants, are major factors weighing against the proposal.

70. I have found that there is harm to the openness of the MOL as well as the harm by reason of inappropriateness, albeit at a level that is reduced due to the factors outlined above and by the policies of the UDP being outdated in terms of their relevance to the supply of housing. Nevertheless, I also note that the Government's Planning Practice Guidance (PPG) states that '*unmet housing need ... is unlikely to outweigh the harm to the Green Belt and other harm to constitute the "very special circumstances" justifying inappropriate development on a site within the Green Belt.*'

71. Even if it is considered that the MOL policies are not carried through to the Framework, they are nevertheless still treated in the same way as those relating to the Green Belt in the LP and I consider that the PPG applies to them in the same way as to the Green Belt policies.

72. I have taken account of the other housing sites that have been granted planning permission in MOL in the Borough and elsewhere but the circumstances in each of these were very different to those in this case and preceded the latest edition of the PPG. I have therefore considered this case on its own particular circumstances and merits.

Conclusions

73. I consider that the extent of harm that would be caused through inappropriate development, loss of openness and to the character and appearance of the surroundings are factors that cause the proposed development to conflict with the DP to a substantial degree. I find that the scheme would not represent sustainable development as defined in paragraph 7 of the Framework because of its failure to meet the environmental criteria set out in that paragraph, through the harm to the character of the surroundings.
74. Even though the policies for the supply of housing may be out of date, I conclude that the identified harm significantly and demonstrably outweighs the benefits in favour of the proposal identified above, when assessed against the policies of the Framework as a whole. Very special circumstances to justify the grant of planning permission do not, therefore, exist in this case.
75. Consequently, for the reasons given above I conclude that the appeal should be dismissed.

Katie Peerless

Inspector

APPEARANCES

FOR THE LOCAL PLANNING AUTHORITY:

Gwion Lewis	Of Counsel instructed by Greg Ullman, Solicitor for the London Borough of Bromley
He called	
Claire Glavin BA (Hons) MRTPI	Principal Planning Officer, Planning Policy Team, London Borough of Bromley
Stephen Sensecall BA (Hons) DipTP MRTPI	Senior Partner, Kemp and Kemp LLP

FOR THE APPELLANT:

Russell Harris QC	Instructed by Nathaniel Litchfield and Partners
He called	
Ian Ritchie	Architect
Richard Coleman Dip Arch (Cant) RIBA	Architecture, Heritage and Townscape Consultant
Steven Butterworth	Senior Director, Nathaniel Litchfield and Partners.
Christopher Francis	West and Partners, Town Planning Consultants

INTERESTED PERSONS:

Cllr. Russell Mellor

DOCUMENTS

- 1 Notes of Mr Harris' opening statement
- 2 Notes of Mr Lewis' opening statement
- 3 Tibbald's report on 1st application on appeal site
- 4 Extract from PAS website
- 5 Screenshots from Hambridge website
- 6 Advertisement for Tweedy Road development site
- 7 Mr Ritchie's notes on acoustic and ventilation matters
- 8 Note on developed area including car park
- 9 Email from Environmental Health Officer in response to noise notes
- 10 Suggested Conditions
- 11 RPS note
- 12 UU Version A – Starter Homes version
- 13 UU Version B
- 14 Route Map to UU versions
- 15 Notes of Mr Lewis' closing submissions
- 16 Notes of Mr Harris' closing submissions

LB Camden – comments on the Nov 2016 draft SHLAA methodology

Camden's officers are generally supportive of the proposed methodology, but have some concerns in relation to:

- how the SHLAA will be used to inform targets; and
- the treatment of student housing.

We also have comments in relation to industrial sites and offices and in relation to vacant homes.

These concerns and comments are set out below.

Housing targets and need

Para 1.5 of the draft methodology notes that the NPPF requires plans to meet the full, objectively assessed need for housing.

We are concerned that the new London Plan should set targets based on housing need, rather than following directly from the SHLAA's assessment of capacity. If the SHLAA suggests that there is insufficient capacity to meet need, efforts should be made to increase capacity on existing sites, identify additional sites, or (through the duty to cooperate) negotiate arrangements for local authorities outside London to meet some of London's housing need.

If the London Plan does not identify sufficient capacity to meet London's housing need, the task will effectively be passed to London's lower tier authorities. Passing the task to lower tier authorities would make up-to-date Local Plan coverage much harder to achieve.

In order to show that they have a 'sound' Local Plan, each lower tier authority will need to:

- individually or on a group basis, undertake a SHMA for the most relevant Housing Market Area;
- demonstrate that there are sufficient deliverable or developable sites to meet their local objectively assessed housing needs; and
- if sufficient sites are not available, negotiate with multiple other local authorities to identify opportunities to meet their needs elsewhere, potentially including authorities across the wider South East.

It will be much easier for lower tier authorities to demonstrate that their Local Plans are sound if the Mayor's London Plan sets targets that will meet housing need, and any arrangements for housing need to be met outside London are negotiated by the Mayor and the GLA on a strategic basis.

Housing targets and plan periods

Para 3.32 of the draft methodology indicates that the SHLAA study will explore the scope for the London Plan to provide 15 year targets with would better align with typical time horizons for Local Plan.

We **support** this statement and agree that lower tier authorities would find a 15 year target helpful.

Para 3.33 of the draft methodology goes on to suggest that the SHLAA study will consider whether it would be appropriate to provide separate annual monitoring targets for each 5 year phase.

We **would not** support separate annual monitoring targets for each 5 year phase.

We have four concerns about separate targets for each phase:

- they are likely to conflict with requirements of the second bullet point of NPPF para 47, which indicates that an additional buffer of 5% or 20% should be added to needs-based housing targets for the first five years of the plan period (depending on each authority's past delivery) moved forward from later in the plan period;
- they are unlikely to be consistent with housing capacity across the phases of local authority housing trajectories, which tend to show a concentration of sites in the first 5 years (reflecting the aspirations of landowners and developers) and a further concentration in the final 5 years (reflecting timeframe for delivery of committed transport projects and other infrastructure); and
- they are unlikely to be consistent with variations in housing delivery, which primarily reflect movements in the economy and the housing market;
- they would make it more complex and difficult for a lower tier authority to show that its Local Plan is in conformity with both the NPPF requirements and the London Plan monitoring targets.

Student accommodation

We will aim in the early part of 2017 to provide a note to the GLA and the Mayor's academic forum about the relationship between student housing need, overall housing need, SHMA, SHLAA and monitoring student housing delivery.

In these comments we seek to focus on those points most relevant to the SHLAA methodology.

Current London Plan arrangements

The London Plan 2015 (as altered by FALP) sets a single target for dwellings, student housing and other non self-contained accommodation.

The Mayor's academic forum and the London Plan 2015 set targets for student housing in terms of the numbers of students that would need accommodation in purpose-built student housing. No attempt is made to relate these to the overall housing need identified by the SHMA.

Guidance on the London Development Database indicates that student housing and other non self-contained accommodation should be monitored in terms of numbers of bedrooms, with the exception of Use Class C4 (small houses in multiple occupation), which are monitored as dwellings given the freedom provided by the General Permitted Development Order for change to Use Class C3 without a planning application. The guidance also suggests that student bedrooms in halls of residence

should be monitored as bedrooms even if the rooms contain cooking and washing facilities.

However, NPPG provides guidance on monitoring student housing at paragraph ID: 3-038-20140306 (within the Stage 5 guidance on "Housing and economic land availability assessment"). It states: "All student accommodation, whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus, can be included towards the housing requirement, ***based on the amount of accommodation it releases in the housing market***. Notwithstanding, local authorities should take steps to avoid double-counting" [emphasis added].

The effect of the London Plan 2015 and the LDD monitoring arrangements is that the need for self-contained housing is set in terms of dwellings, the need for student housing is set in terms of student places, student housing is monitored in terms of net additional bedrooms, and overall housing provision is monitored by treating each student bedroom as equivalent to a self-contained dwelling. This is not internally consistent, and does not comply with the requirements of NPPG paragraph ID: 3-038-20140306, since each additional student bedroom cannot be expected to release one self-contained dwelling to the housing market.

The internal inconsistencies in these arrangements and the departure from Government guidance create considerable complexity for lower tier authorities with a significant student population in demonstrating that their Local Plans are sound, and are thus an obstacle to the adoption of Local Plans.

Alternative treatment of student housing for SHLAA and future London Plan

Ideally the SHMA would specifically identify the need for student accommodation (and any other additions to non self-contained housing), the SHLAA would separately identify sites most likely to be developed for them, and the need and supply would be counted on the same basis.

We accept that this is unlikely to be possible given the difficulty in anticipating which potential sites are more likely to be developed for student housing than self-contained housing. However, we consider that the GLA should devise a robust and transparent alternative as part of the 2017 London SHMA and SHLAA and the full review of the London Plan (with consistent arrangements for monitoring through the LDD). The following paragraphs give an indication of what would be required, but the estimates they contain are unlikely to be sufficiently robust for SHMA and SHLAA purposes.

Rooms vs dwellings

DCLG household projections assume that the size of the institutional population will remain constant for those aged under 75 (DCLG Methodology Report, April 2013, page 8). Consequently, any projected growth in student numbers forming part of the population projections would fall within the household population.

NPPG paragraph ID: 3-038-20140306 requires us to consider how many self-contained dwellings will be released to the housing market.

It seems unlikely that a significant proportion of students living in self-contained homes are one person households. As an indication, the 2011 Census suggests that in Camden there were 2,322 all-student households (full-time), the majority of these occupied two- or three-bedroom homes (1,474 households), and the all-student households were made up of 7,303 students in total, or around 3.14 students per household (based on tables DC1402EW, QS112EW and QS113EW). This is a crude estimate, as it represents just less than 30% of full-time students usually resident in Camden (25,130 aged 18+ KS501EW).

Across London, the same tables suggest there were 24,384 all-student households (full-time), the majority of these occupied two- or three-bedroom homes (15,531 households), and the all-student households were made up of 78,050 students in total, or around 3.21 students per household. This is a very crude estimate, as it represents just less than 15% of full-time students usually resident in London (529,685 aged 18+ KS501EW).

Overall, it appears that just over three additional student bedrooms would be required to release one self-contained dwelling to the housing market.

Given that targets for student housing are set in terms of the number of students that would need accommodation in purpose-built student housing, it seems appropriate to continue to monitor student housing delivery separately in terms of additional bedrooms. If student bedrooms are to be aggregated with self-contained homes for the purposes of monitoring overall housing delivery, and the Camden estimates are accepted, student bedrooms should be seen as equivalent to 1/3 of a self-contained dwelling, and one self-contained dwelling should be considered as equivalent to three student bedrooms.

Notwithstanding this point, there is a small stock of self-contained and purpose-built student dwellings in Camden. The 2011 Census indicates that 243 all-student households (full time) in Camden lived in accommodation with one bedroom and 2,630 all-student households (full-time) across London live in accommodation with one bedroom (DC1402EW). We consider it reasonable to assume that a self-contained dwelling that is purpose built for students will release one unrestricted self-contained dwelling to the housing market. Consequently, for the purposes of monitoring overall housing delivery, it would be consistent with NPPG paragraph ID: 3-038-20140306 for one self-contained dwelling purpose-built for students to be seen as equivalent to one unrestricted self-contained dwelling.

We consider that evidence on the likely release of self-contained dwellings to the housing market by provision of student bedrooms should be included as part of the SHLAA (and/ or the SHMA), and conclusions should be included in the London Plan to provide guidance for lower tier authorities in preparation of their Local Plans and housing trajectories.

Sites

We welcome references to student housing and other non self-contained accommodation in para 1.2 (first bullet point) and para 5.7 (first instance) of the draft

SHLAA methodology, and particularly reference to the potential to identify sites as particularly suitable for student housing. However, para 5.7 (first instance) indicates that consideration of potential housing capacity/ density may be different for student housing without indicating what it might entail.

We suggest that the SHLAA methodology should also include:

- explicit provision for allocations that are partly or wholly for student housing or other non self-contained accommodation (para 1.2 second bullet point);
- acknowledgement that housing supply should be considered having regard to NPPG ID: 3-038-20140306, and on that basis the supply of one student bedroom should **not** be treated as equivalent to the supply of one self-contained dwelling (after para 1.2 and possibly para 5.7);
- a conversion factor to be used for considering the housing supply created by student rooms (based on evidence of the likely release of self-contained dwellings to the housing market by provision of student bedrooms) – on the basis of the evidence presented this could take the form of guidance that a student bedroom should be seen as equivalent to 1/3 of a self-contained dwelling;
- acknowledgement in Section 2 that the density estimates and assumptions provided relate to self-contained dwellings, and adjustments are required when considering student housing and other non self-contained accommodation; and
- guidance on how potential housing capacity/ density should be adjusted where sites are considered to be particularly suitable for student housing (in Section 2 and/ or the first instance of para 5.7) – this is considered further in the following paragraphs.

During public examination of the submission draft Camden Local Plan 2016, the Inspector asked officers to provide separate estimates in our 15-year housing trajectory (on a site by site basis and in total) of the expected delivery of additional self-contained homes and the expected delivery of additional student bedrooms.

On the basis of the pipeline of planning permissions and site allocations in adopted Development Plan Documents, officers were able to form a view of which sites were likely to provide student housing, which were likely to provide self-contained housing, and which were likely to provide a mix of housing types.

The capacity of allocated sites in the housing trajectory had been previously been considered and presented only in terms of self-contained dwellings. For sites where officers considered that delivery was likely to take the form of student housing it was necessary to amend capacity for self-contained dwellings into capacity for student bedrooms.

Officers took the view that the scale, mass and bulk of development appropriate to a site would be similar whether developed for self-contained dwellings or student bedrooms. On that basis, the amendment to capacity could be undertaken by applying a simple multiplier on the basis of the number of student bedrooms (together with supporting circulation and communal facilities) that would fit into the floor area that would otherwise be occupied by a self-contained dwelling.

LB Camden operates minimum standards for HMOs and hostels last updated in May 2016, and these generally apply to non self-contained student housing operated by a private provider. These give a minimum floor area for a single bedsit room with no amenities as 9 sq m. Where kitchen facilities are located in the bedsit room, the minimum floor area for a single bedsit room is 12 sqm. Where a WC, hand basin and shower are provided in the bedsit room, a minimum addition of 2.2 sqm is required.

Contemporary student accommodation in Camden typically includes en suite WC, hand basin and shower. Kitchen provision is more often made on a shared basis for a cluster of bedrooms, although bedrooms would commonly include a desk/ workspace. On balance, we consider that 15 sqm represents a reasonable estimate of the floor area of a typical student bedroom. Having regard to the additional circulation, communal and other support space required for student housing, we have estimated that capacity for 25 sqm of floor area for self-contained dwellings would be sufficient to provide for each student bedroom, and that the floor area required for a typical self-contained home could provide at least 3 student bedrooms.

This is clearly a crude estimate, and we would suggest that for the purposes of the SHLAA it would be necessary to provide a brief study of the ratio of student bedrooms to floor area across a sample of recent student housing developments in different locations, including developments undertaken by private providers and by HE institutions. This study should also take account of the communal circulation and service space required for flatted developments of self-contained homes.

LB Camden's estimates suggest a helpful symmetry between the number of self-contained dwellings likely to be released to the housing market by provision of non self-contained student housing, and the number of student bedrooms that can be accommodated in the floor area required for a self-contained home. In effect, a specific area of land can accommodate the same number of students whether it is developed for self-contained dwellings or non-self contained student housing.

Conclusions

We **support** the continued monitoring of non self-contained student housing as a discrete source of housing supply considered in terms of numbers of bedrooms.

We **propose** that the SHLAA (and/ or SHMA) should provide evidence on the likely release of self-contained dwellings to the housing market by provision of student bedrooms, and that the London Plan should provide conclusions in the form of guidance on the number of student bedrooms that should be considered as equivalent to one self-contained dwelling.

For the purpose of monitoring overall housing delivery, we **propose** that additional student bedrooms should be considered in terms of the self-contained dwellings they will release to the housing market. On the basis of the evidence presented here, we estimate that one student bedroom is equivalent to 1/3 of a self-contained dwelling, and one self-contained dwelling is equivalent to three student bedrooms.

For the purpose of monitoring overall housing delivery, we consider that it would be reasonable for one self-contained dwelling purpose-built for students to be seen as

equivalent to one self-contained dwelling in the general market. However, given the relatively small numbers involved, and the difficulty in distinguishing between those purpose-built student bedrooms that contain cooking and washing facilities and those that do not, we also consider that it would be reasonable for all purpose-built student housing to be monitored in terms of student bedrooms, with one student bedroom estimated to be equivalent to 1/3 of a self-contained dwelling.

We would **oppose** the continued consideration of an additional bedroom in non self-contained student housing as equivalent to an additional self-contained dwelling.

As part of the SHLAA methodology, we **propose** that the capacity of each SHLAA site should be considered in terms of capacity for self-contained dwellings or capacity for student bedrooms (or where a mixed development is likely, capacity of part of the site for self-contained dwellings and part of the site for student bedrooms). We estimate that capacity for one self-contained dwelling is equivalent to capacity for 3 student bedrooms.

On a London-wide basis, we **propose** that the SHLAA should be used (alongside the London SHMA and the conclusions of the Mayor's academic forum) to inform separate targets for self-contained homes and student bedrooms. We also **propose** that the SHLAA should be used to inform an aggregate London-wide housing target considered in terms of the number of self-contained dwellings that will be released to the housing market by each student bedroom. As indicated above, we estimate that one student bedroom is equivalent to 1/3 of a self-contained dwelling, and one self-contained dwelling is equivalent to three student bedrooms.

On a borough-by-borough basis, we consider it reasonable for the SHLAA to provide aggregate targets for self-contained dwellings and student bedrooms.

We **propose** that the SHLAA methodology should provide guidance on how potential housing capacity/ density should be adjusted where sites are considered to be particularly suitable for student housing (or suitable for a mix of student bedrooms and self-contained dwellings).

- We **propose** that the density estimates and assumptions provided in Section 2 of the SHLAA methodology should be used to assess the capacity of SHLAA sites for self-contained dwellings.
- We **propose** that SHLAA methodology should provide a multiplier for converting the capacity for self-contained dwellings into the capacity for student bedrooms, based on the number of student bedrooms that can be accommodated in the floor area required for a self-contained home. We estimate that the floor area required for a typical self-contained home could provide at least 3 student bedrooms.

For the purposes of Local Plans and housing trajectories, we consider it reasonable for lower tier authorities to determine the proportion of their housing supply that should take the form of self-contained dwellings and the proportion that should take the form of student bedrooms, having regard to

- the London Plan's aggregate monitoring targets for housing in each borough;
- the requirements of London Plan Policy 3.8 (or its equivalent) in relation to student housing;

- the London Plan guidance we propose on the number of student bedrooms that should be considered as equivalent to one self-contained dwelling; and
- any sites identified in the SHLAA as particularly suitable for student housing (or suitable for a mix of student bedrooms and self-contained dwellings).

On the basis of the estimates presented here, we consider that this determination by lower tier authorities would be broadly neutral in terms of housing supply, as a site with capacity for 100 self-contained dwellings or 300 student rooms would be treated as equivalent to a housing supply of 100 self-contained dwellings in either case. Additional housing supply will only arise where sites come forward for student housing that would be unlikely to come forward for self-contained dwellings (eg due to amenity or viability considerations).

Industrial sites and offices

Camden Council seeks to protect business premises unless they are no longer suitable for business use, including industrial and office premises. Article 4 restrictions are already in place covering the majority of office premises outside the CAZ, and will also be introduced for CAZ when the CAZ restrictions in the General Permitted Development Order expire in 2019.

We acknowledge that Article 4 restrictions will effectively require a planning application to be submitted prior to any change of use of office premises to housing, but they will not override NPPF para 51 guidance on approving the residential use of commercial buildings.

We note that Table 5 in the draft methodology lists several categories of industrial land within the planning policy constraints, but does not include office sites or areas.

We further note that Table 6 indicates that where boroughs are classed as 'restricted' for the release of industrial land, locally significant industrial sites are assigned a 40% probability of housing development and non-designated industrial sites are assigned a 45% probability of housing development.

We note that there will be potential for boroughs to amend the default industrial site assumptions and do not object to them. However, we question whether they are consistent with the approach to offices set out in paras 3.43 to 3.45 of the draft methodology.

Paras 3.43 and 3.44 of the draft methodology appear to suggest a more restrictive approach to offices than to locally significant and non-designated industrial sites in the restricted boroughs.

The first bullet point of para 3.44 of the draft methodology suggests a low probability assumption of 5% within CAZ, and we consider this to be appropriate.

The second bullet point of para 3.44 suggests a higher probability of 10% for sites in other locations, which seems low compared with the probabilities suggested by rows 4 and 5 of Table 6.

Para 3.45 of the default methodology appears to suggest that a default probability of 100% for other sites.

We would **suggest some clarification** of the arrangements for offices in the draft methodology, and the creation of an intermediate probability category comparable with rows 4 and 5 of Table 6 (eg 50%). This intermediate probability might potentially be suitable for large sites in significant office locations outside CAZ, such as Camden Town.

Vacant homes

We agree that there is limited potential for setting monitoring targets for vacant homes returning to use, as set out in paragraphs 5.8 and 5.9 of the draft methodology, and **support** the conclusions set out in paragraph 5.10.

[REDACTED]

From: [REDACTED]@cityoflondon.gov.uk>
Sent: 19 January 2017 09:12
To: London SHLAA
Subject: Draft SHLAA Methodology

[REDACTED]

Basically the City of London Corporation is comfortable with the Draft SHLAA Methodology and considers that the methodology has evolved since the last SHLAA process to take on board the feedback of boroughs.

Specific comments are set out below.

Paragraph 2.3 Density Estimates: The City of London is within the Setting defined as Central. In practical terms Housing Stock is likely to be almost 100% flats within the City. Would a percentage for the Central Activity Zone be appropriate?

Paragraph 2.8: Density assumptions: Table 1 see comments above. Should this be refined to reflect that density is normally influenced by the issues of whether the location is in an area subject to Heritage Assets related policies. For example, in the City there have been a range of small scale conversions within Conservation Areas, delivering just a few units, whereas in neighbouring localities not affected by heritage asset policies there have been large scale office conversions to housing. Alternatively this is amended as per Paragraph 2.11 borough amendments to density estimates, with reference to the heritage assets.

Paragraphs 3.29 to 3.31 Phasing of Sites: Housing delivery in the City has primarily been delivered on sites which were previously office use. In practice potential sites are likely to be identified through sites under discussion or where the property is coming to end of its practical usage. Being able to identify potential sites beyond 10 years is likely to be difficult.

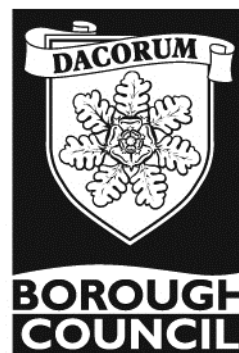
Paragraphs 3.32 to 3.33 Housing Targets: Sensible to base targets on phasing periods which have some element of correlation with likely delivery. The SHLAA is intended to be a statistical exercise and should not be setting policy. Whilst it will indicate overall capacity and annual requirements, it needs to be carefully phrased to ensure it does not set targets for individual boroughs in advance of policy constraints through the London Plan.

Paragraphs 3.36 to 3.43 Low probability sites / offices: Sensible approach. The relevant Local Plan land use policies for the City of London set out the spatial concentrations of both housing and office land uses.

Regards

[REDACTED]
Team Leader Monitoring and Information
Department of the Built Environment
City of London Corporation
Guildhall
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Date: 20 January 2017
Your Ref.
Our Ref:
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Dear [REDACTED]

Draft London SHLAA methodology – consultation

Thank you for the opportunity to comment on the above draft methodology.

Please find Dacorum Borough Council's (DBC) detailed response to the SHLAA methodology attached as Appendix A.

DBC's fundamental concern is that the Green Belt should not be used as a key policy constraint in assessing the acceptability of sites. We acknowledge the identification of the Green Belt as a high-level policy constraint, but it should not be seen as a "show stopper". It is vital that the London SHLAA is as inclusive as possible. DBC would point out that this is an accepted approach taken by authorities in Hertfordshire and elsewhere outside of the Greater London area. If this issue is not properly reflected in the SHLAA, then it will only add to pressure for neighbouring authorities in the Home Counties to make up any housing shortfall.

However, DBC supports the general approach in the SHLAA to planning for higher densities where London Boroughs have the policies and commitment to do so.

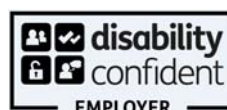
DBC also wishes to express its support for the joint Hertfordshire authorities' response which has been submitted separately.

Yours sincerely

[REDACTED]

Strategic Planning and Regeneration

Enc.



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Appendix A

Dacorum Borough Council (DBC) - Draft London SHLAA Methodology response

Page No.	Reference	Comments
3	Paras. 1.12-1.13	DBC would urge GLA to be as open as it can regarding the confidentiality of sites. While we understand the need to aggregate totals, the study should be able to demonstrate the source of such supply in each case. This will instil greater confidence in the results of the study and could, for example, be accommodated as a separate technical appendix to the main document.
4-8	Paras. 2.1-2.16	DBC would stress the need to be cautious about assuming high densities in the cases stated, particularly in terms of the standard density assumption under para. 2.6 unless these are based on a policy acceptance by certain London Boroughs who have adopted an approach to higher buildings/densities. While this may be more realistic, for example, in town centre locations, it may not always be achievable (or necessarily desirable) elsewhere. The approach advised by our SHLAA consultants has always been to work with a mid-point between low and high densities in order to provide a balanced view on potential yield.
9	Paras. 3.3	DBC is not familiar with the “probability based approach” to assessing the capacity of sites. It might be helpful to elaborate or point readers to where this has been tested to reassure them that such an approach is robust. It may ultimately be simpler to put sites where there are doubts as a result of constraints into later phases or to reject them altogether. This has been the general approach used elsewhere.
10	Para. 3.4	It would be sensible to acknowledge that some form of local testing is applied to the allocated sites (as per the stated approach in the previous SHLAA). While DBC agree that there is a greater likelihood that such sites will come forward, GLA should not assume that all allocations are necessarily available
11	Para. 3.7	Green Belt should not be used as a key policy constraint in assessing the acceptability of sites. This is a fundamental concern of DBC. Whilst the Green Belt is acknowledged as a high-level policy constraint, it should not be identified as a “show stopper” in order for the London SHLAA to be as inclusive as possible. Green Belt sites that are subsequently found to be suitable, available and achievable that are then assessed as being acceptable, could then be subject to further technical / policy work. This is an accepted approach taken by authorities in Hertfordshire and elsewhere outside of the Greater London area. If this issue is not properly reflected in the SHLAA, then it will only add to pressure for neighbouring authorities in the Home Counties to make up the shortfall.
14	Para. 3.14	Reference to EA Flood Zones could be tempered to

		refer to the approach being adjusted in the light of any detailed on-site flood risk assessments carried out by landowners / developers (and not just SFRAs).
14-15	Paras. 3.21-3.26	It would be more helpful if this section was framed in terms of suitability, achievability and availability rather than “delivery constraints”.
14	Paras. 3.21-3.26/Table 8	DBC would take the view that if there is no clear intent identified through a landowner to bring land forward, then a site should simply be excluded.
21	Para. 5.7	DBC disagree that non self-contained housing should be included in the SHLAA. These are non-traditional forms of new housing gain. It would be safer to discount these from contributing to the SHLAA.
22	Paras. 4.1-4.5	It is unclear whether the scenario testing will involve the use of individual design case studies. These are helpful in exploring the workability of different schemes and in testing different residential densities.

[REDACTED]

From: [REDACTED]@ealing.gov.uk>
Sent: 20 January 2017 10:48
To: London SHLAA
Cc: [REDACTED]
Subject: RE: Draft London SHLAA methodology

Dear [REDACTED]

Thank you for providing us with the opportunity to comment on the draft methodology. We've spent some time reviewing this and had a small number of points which we wanted to raise.

Whilst we understand that there will be an opportunity to adjust a number of the assumptions used in the study on a case by case basis, and this is welcome, the default assumptions should nonetheless provide a reasonable baseline from which to work from, and accordingly we believe that a number of these should be revised. Whilst there will clearly be a need to review assumptions on a case by case basis to reflect site specific circumstances, the default assumptions nonetheless provide an important steer and this is crucial to maintain a broadly consistent approach between boroughs.

Density assumptions in opportunity areas

The methodology proposes elevated density assumptions for opportunity areas. Whilst the role of opportunity areas as major reservoirs of housing land is recognised, and housing output should be optimised and typically higher densities will be promoted in such areas, opportunity areas are also diverse. Their ability to accommodate significant housing capacity might be more a consequence of their scale, rather than their suitability to accommodate higher density development. Intensification areas in contrast can support higher densities and yet no mention is made of these in the methodology.

Designated Industrial Land

The proposed methodology distinguishes between SIL and LSIS assigning each a default probability of 0% and 50% (Ealing is categorised for 'Limited Transfer') respectively. The methodology advises that this distinction in probabilities reflects the fact that the stock of LSIS has reduced at a higher rate compared to SIL as evidenced in the GLA's recently published Industrial Supply Study. Specific reference is made to the rate of loss noting that the stock of LSIS land has reduced by 23% compared to 5% for SIL. The rate of loss of LSIS is therefore 4.6 times that of SIL. Whilst this difference in loss is noted, the assigned default probabilities assume a far more pronounced rate of loss between LSIS and SIL (in effect 50 times greater), when compared against the actual rate of loss. The assigned default probabilities for LSIS and SIL ought to be aligned more closely, and in fact it might be argued that they should be assigned the same probability. In development management terms both are treated equally within Ealing, and with the exception of a handful of boroughs we believe that this is the approach adopted by other boroughs where they have designated LSIS. Presumably where releases are proposed or planned, such sites will have already be identified for de-designation where a Local Plan is still emerging or will already have been de-designated where the plan is adopted, and the designated industrial land constraint should not therefore be triggered.

With the exception of those releases already identified through Local Plans, further losses of either are not desirable in policy terms. Despite this it is acknowledged that assigning 0% probability to both fails to reflect the reality of what is happening on the ground, and therefore potentially underestimates the contribution that this might make to capacity. Locally we have found that our SIL sites have been equally vulnerable to loss for example through the application of PD rights as our LSIS. Although such losses have been undesirable for various reasons, it nonetheless does contribute to capacity, and this ought to be reflected in some way in the assumptions.

Designated Open Space


It is understood that all designated open space will be classified as 'unsuitable', and paragraph 3.7 lists those designations which are covered. This includes Sites of Special Nature Conservation Interest and Sites of Special Scientific Interest. It would be helpful to clarify if SMIs and SINCs also fall within this definition, as we believe that such regional and local designations should be assigned the same probability as national and European designations.

Environmental Constraints

In the case of flood risk, a sites location within flood zone 3a only reduces probability by 5-10% despite national policy being clear that such 'more vulnerable' (including housing) uses should be directed away from such areas and would only be acceptable if supported by an Exception Test. This percentage reduction is too low. Clearly where a site straddles more than one zone, would it not be better to determine probability based on the proportion of the site which falls within these higher risk flood zones.

Kind regards




Principal Planning Officer
Strategic Planning Team
Regeneration and Planning Services,
Regeneration and Housing Directorate
London Borough of Ealing

[REDACTED]

From: [REDACTED]@elmbridge.gov.uk>
Sent: 18 January 2017 15:44
To: London SHLAA
Cc: [REDACTED]runnymede.gov.uk); [REDACTED]surreycc.gov.uk)
Subject: SPOA repsonse to Draft London SHLAA methodology

I am writing on behalf of the Surrey Planning Officers Association which represents the heads of planning of the Surrey local authorities, in response to your consultation on your draft SHLAA methodology.

We would support the approach outlined to the SHLAA set out in the draft methodology. It uses reasonable sources for the identification of sites and the assumptions used with regard to the deliverability and capacity of sites appear sound. However, we still have concerns with regard to how the SHLAA will be used and in particular the Mayor's approach to Green Belt and industrial land.

Green Belt

The SHLAA correctly identifies Green Belt as a constraint to development. However, the Mayor should make it clear that if the SHLAA indicates that London is unable to meet its identified need through existing sites then a review of the Green Belt within London should be undertaken. This review should assess whether there are areas in the Green belt that no longer meet the purposes of these policies and as such may offer opportunities for further development. In addition Planning Practice Guidance (Ref ID:3-011-20140306) highlights that sites that have constraints should still be included in any assessment and that it is important to test previously defined constraints rather than simply accept them. As such, unless a review is undertaken any new London Plan would not be in conformity with national policy and could be considered to be unsound.

Industrial land

Any future studies on the potential for industrial land to be used to meet housing needs must not place pressure on other areas to support these uses. The Mayor must use their assessments of employment need and employment land review to establish needs and how those needs should be met. The statement made in the SHLAA refers to scenarios that reflect a London centric position that could see the release of industrial land that places demand pressure on areas outside of London. In particular we are concerned about the tipping point scenario that examines the quantum of land that could be released without impacting on the London economy. We would expect further consultation as part of the duty to co-operate with regard to any studies commissioned on industrial land and demand within London for such land.

If you require any clarification on the pints raised in the response please let me know.

Regards

[REDACTED]
Planning Policy Manager
Elmbridge Borough Council
[REDACTED]

Greenwich Comments on 2016 Draft SHLAA Methodology

Para 1.7:

a) The methodology needs to provide for site capacity reassessment due to changes in circumstances during the lifetime of the SHLAA. In the case of Greenwich a number of major transport proposals will, if realised, create a major change to the PTAL map of the east of the borough, changing sites' notional capacities and thus the capacity of sites to help meet the borough's housing need.

Once such transport proposals are definite, site capacities need to be remodelled on the basis of appropriate densities that take full advantage of improved accessibility and thus higher PTAL. It should not be a matter of waiting until the infrastructure is in place before revising site capacities, because this delay raises the danger of sites being developed at inappropriately low densities before the increased accessibility is achieved. These improvements will occur well outside the timeframe for the full review of the London Plan and this iteration of the SHLAA methodology.

b) In respect of the potential for additional housing intensification in town centres and out of centre retail locations, the same argument applies. The need to achieve the most efficient transport system dictates that higher density housing should be in specifically-identified locations rather than located randomly, and this provides a means for development to justify improved public transport and thus achieve higher PTALs, so that transport upgrades may in some cases be development-led, rather than development being dictated by the existing PTAL map. In some cases this will be at locations not in or adjacent to town centres.

c) The potential for housing intensification in town centres depends on the complementary planning of housing and retail. A surplus of retail floorspace in a centre presents opportunities to provide additional housing and to improve the viability of the remaining retail floorspace, but it is vital that this transition is achieved in a way which achieves tight, well-defined and viable town centres, rather than a random distribution of housing within centres, leading to a fragmentation of retail and a gradual disintegration of the viability of centres. The SHLAA process must take other planning objectives such as centre function and viability into account, rather than being simply a headlong rush into providing housing to the exclusion of other planning objectives. This issue applies at all levels of the retail hierarchy.

Para 1.9:

a) The wording of the reference to infrastructure-led scenarios for the release of industrial land to the degree needed to deliver Crossrail 2 and the Bakerloo Line extension suggests an exercise for its own sake ie securing residential development in order to justify the projects. It is not a matter of providing housing to justify infrastructure, but a matter of providing infrastructure to support housing. The wording of the SPG needs to make it clear that industrial land is being reclassified because of the greater need for housing land, and that the housing is needed on its own account, not to justify spending on infrastructure.

b) The use of a trend-based scenario to justify redevelopment of industrial land to housing by means of a simple extrapolation exercise should be with caution. The reasons behind trends must be clearly understood and an assessment made of their likely continued influence on industrial land demand, as well as of new factors coming into play, in order to identify any additional housing opportunities this land offers. In the case of Greenwich it is anticipated that construction of the Galleons Reach Thames Crossing carrying road and DLR traffic will improve the viability of industry and thus industrial land demand and value in Plumstead-Thamesmead-Abbey Wood. This is a case in which merely extrapolating past demand trends is not appropriate.

Para 1.10:

Any assessment of the scope for intensification and co-location of industrial activities with other uses (including residential) must recognise that some industrial sites are vital to London's

continued prosperity, and co-location of other uses may jeopardise them by virtue of being incompatible with industry

In addition, some industries and employment clusters are critical to London's economic wellbeing. The importance of the service industries in Park Royal to the hospitality and leisure sectors in the West End is a case in point, as is the importance of the minerals wharves in Charlton in Greenwich borough to London's construction industry. Whilst these wharves are themselves safeguarded sites, the adverse impact on residential amenity and resulting pressure for closure of these undertakings due to the amount of noise they generate, often very late at night and early in the morning due to gravel delivery times being dependent on river tides, must be kept in mind when considering the relationship between housing and other uses – in some cases sites adjacent to or near industry are not appropriate for housing, and housing provision in these case is not the prime consideration.

Para 1.12:

It is vital that the final version of the methodology includes a requirement for site specific information on all 'potential' sites in SHLAAs to remain confidential, for the reasons stated in this paragraph.

Para 2.3:

The meaning of the text in the cell Housing Stock/Suburban of the table after the third dot point in this paragraph needs correction or clarification. Is it meant to say 'All other dwelling types' or similar?

Para 2.6:

The standard density assumptions are supported.

Para 2.11:

It would be helpful for reason of consistency across London if the GLA were to issue guidelines as to when and where boroughs will be able to adjust the density assumptions on sites where they consider that the density should be different to the system estimate. It is important that there is a consistent basis to such departures, particularly in order to provide a basis to defend planning decisions in the case of appeals.

Para 2.12:

The statement that local infrastructure capacity is considered through the constraint testing process and, so will not be used as a reason for reducing the density estimate for a site is a blunt instrument, because there may be genuine constraints or unrealistically high costs to overcoming infrastructure provision. Also, in some cases, eg environmental constraints, visual impact, etc there may be reasons for limiting development intensity, and simply upgrading infrastructure will not necessarily overcome such constraints.

Para 2.14:

This paragraph should articulate the process for assigning character setting in the absence of a characterisation study. In the case of Greenwich borough, the only areas that have been subject to any characterisation study are the conservation areas.

Para 2.15:

Can it be confirmed that planning work for opportunity areas will, for SHLAA purposes, continue to identify potential development sites and capacities for them, so that SHLAA work need not extend into these areas at the risk of duplicating the planning for them. This will allow development capacity estimates for opportunity areas to be fed directly into housing trajectories.

Para 2.16:

a) The model that GLA is currently working on with LSE and TfL for assessing appropriate potential residential densities is a welcome initiative, but needs to be completed as quickly as possible, as there is little point in boroughs' housing trajectory work generating capacity forecasts at odds with the output of a model which, it is assumed, will be used to inform GLA housing development policy and with which boroughs will therefore need to conform. The model needs to be completed and incorporated into the adopted version of the SPG.

b) Also, it would be useful if the relationship between this model and the current PTAL-based density controls were to be articulated.

Para 3.2:

a) The probability-based capacity forecast model. The tenets of the model are supported, but it is felt that the following need to be added to the list of policy constraints:

- Key retail locations
- Conservation areas and items
- Social infrastructure sites and future site needs.

As the value of housing and its position as the most profitable use of land further outstrip other uses, this further increases the imperative to 'protect' land to ensure that the facilities and services needed by the occupants of that same housing can be provided. At the same time, whilst provision of housing is the main task of the planning system at present, it is not the only task, and other planning objectives must not be forgotten.

b) The following need to be added to the list of environmental constraints:

- High value conservation areas (SSSIs, SINCs)
- Contamination

In addition it is suggested that the word 'pylons' under this category be replaced with 'high voltage power line exclusion corridors' or similar. This is because the pylons themselves are not a constraint (any more than a radio transmission tower). The real constraint is the high voltage power lines they carry, due to the probable adverse health impact of high levels of high frequency electromagnetic radiation from the power lines.

It is suggested that site contamination be classed as a delivery constraint rather than an environmental constraint, because in most cases it is possible to decontaminate sites, or to remediate them in a way which contains contaminants sufficiently to render the site safe for residential use, with the development constraint more likely to be cost rather than technical considerations.

c) Under delivery constraints, it is suggested that public opinion be included. Councils generally know their boroughs and their community well enough to be aware of likely opinion of a given scheme on a given site, and this can be factored into the probability of a development being able to be achieved, or being able to be achieved in a given timeframe.

Para 3.3:

Probability-based approach. The process inherent in a probability-based predictive model needs to incorporate a sequential testing dimension. As an example, it is preferable to maintain sites for schools (ie current schools and sites to meet known future needs) for that use, but housing demand may be at a level which means that some sites need to be reallocated for housing, or that the sites will need to accommodate both uses through appropriate design of development. Because the housing itself needs infrastructure, the sequence would in this case be firstly, school use, secondly shared school/residential use, thirdly loss of the site from school to housing. This is clearly not a satisfactory outcome, unless land in the vicinity is available for a replacement school,

and the cost of constructing this is justifiable. Continuing the sequence, relocation in the vicinity is preferable to relocating elsewhere. At each stage of the sequence the probability therefore improves, and the modelling should be able to reflect this.

Para 3.15:

Safeguarded wharves: as discussed in Greenwich's comments in respect of paragraph 1.10 the safeguarding of wharves is not restricted to precluding their redevelopment for other uses. It is also imperative that uses that are incompatible with the activities at these wharves do not occur. In the case of the safeguarded wharves along the Thames at Charlton in Greenwich borough these wharves are used for the transhipment of aggregates and other minerals used in concrete manufacture and other uses in the construction industry. These are vital to London's economy as London's building activity is almost entirely reliant on the functioning of these wharves.

They need to be able to operate 24 hours per day, because much of the aggregate arrives by boat and tying up and unloading requires a high tide, the timing of which varies throughout the day and night. For the protection of residential amenity and thus averting of political pressure which could result in closure of these wharves, it is necessary that residential uses do not occur in the zone around these wharves subjected to high noise levels and noise levels inappropriate to most people's sleeping hours. Therefore these sites as well as the necessary buffer zone around them should be recognised as not being appropriate to being included in a SHLAA.

Para 3.17:

- a) Suggest that the heading be amended to 'Environmental and Policy Constraints'.
- b) In addition the footnote regarding gasholders needs some augmentation: It is understood that where a gasholder site is submitted to the GLA through the call for sites the constraints will be "turned off" to allow the site to be considered as any other. However if the submitted site is smaller than the HSE-set blast zone around the gasholder a means of turning the constraints back on is needed, so that any sites still lying in the blast zone are subject to the constraints. This is because the gasholder site may never come forward for development, and so the HSE zone will still be needed.

The probability model therefore needs to have the flexibility to deal with the scenarios of gasholder sites being:

- immediately available,
- available at some future time during the lifetime of the SHLAA, or
- not being available at any time within the SHLAA's lifetime.

- c) Greenwich council suggests that an additional category of social infrastructure constraints is needed. This table needs to include reference to planning policy constraints on loss of community facilities, or other such constraints in the London Plan or Local Plan which restrict use. If a council does not intend to remove these policy constraints then this affects probability. Therefore the suggested further planning policy constraint category is suggested, which boroughs would be able to input and edit. It has a range of probabilities, depending on the likely housing capacity of the site due to existing use and the capacity for introducing housing as a second use of such sites.

Para 3.21:

Delivery constraints: the first row of table 8 is titled land ownership, but it is not clear why land ownership per se influences the degree of constraint. The critical issue is the willingness of the owner to make a site available, and the categories of low, medium and high land ownership do not seem to make sense. Can this please be explained by way of additional text, or excluded from the methodology.

Para 3.24:

Boroughs should be able to set the delivery constraint level as 'unsuitable' i.e. 0% probability where justified. It is noted that 400 sites were classified as unsuitable (due to land ownership) in the previous SHLAA. Boroughs must be allowed to do this again, as there were some sites in the last SHLAA which appeared to have been included at random eg residential streets (highway land flanked by housing using the street for access), churches and so on. In addition, often the polygons appeared to include random areas beyond the (assumed) intended site boundaries, although it is acknowledged that this may simply have reflected the accuracy of the mapping but if so, the mapping needs to be improved to avoid doubt.

These sites should initially have been cleansed by the GLA before reaching the boroughs. As the process does not work perfectly, councils should have the possibility of effectively cleansing the data by making these sites "unsuitable", or by redrawing the boundaries to reflect the actual site boundaries.

As per the comments in relation to paragraph 3.21 above, to quote an example from the previous SHLAA, the constraint on the redevelopment for housing of Greenwich Town Hall is not an ownership issue – many development sites have been council-owned – but that the site is needed for public administration purposes and that it is a conservation item.

Para 3.29:

Phasing of sites: In table 10 phase one is dated 'from the date of the study' as 2016, but this is now incorrect – as the study is not due to start till 2017 the phasing start date should be April 2017, and the phasing periods should be adjusted accordingly.

Para 3.38:

a) Many of the categories of low probability sites listed in 3.38 will be sites that will not come forward in the plan period or in the foreseeable future and so should be listed as 'unsuitable' or 'post plan period' or similar. However since they are allocated with an 8% probability and go into the later phases is there an ability for councils to alter the phasing and put sites into the last phase (phase 5) only? There is little point in putting them in earlier phases with such a low level of probability. The issue is that even though it is not foreseen that circumstances will change and thereby make a site more probable to be developed, the reality is that in time many factors find resolution and sites are therefore eventually able to be developed, meaning that the probability of sites being able to be developed increases over time.

b) The fifth criterion – new build housing completed before 2003 – is covered by the third and fourth criteria. Even in the absence of those criteria, there is little prospect of most housing sites providing redevelopment sites unless the land values are high enough to make site assembly and redevelopment financially viable. Only on sites in single ownership (the most common and obvious ones being publicly or institutionally-owned residential complexes) would the difficulty of site assembly not be an issue.

[REDACTED]

From: [REDACTED]@Hackney.gov.uk>
Sent: 17 January 2017 10:13
To: London SHLAA
Subject: RE: SHLAA timescales and site assessments

Dear [REDACTED]

We have reviewed the Draft SHLAA Methodology and find the updated sensible. However, we do have the following queries:

1. We would suggest that Non-designated industrial/employment sites protected by Local Plan designations are set at the same level as LSIS. This is due to the fact that this does not reflect the way that many boroughs make use of employment designations, where Local Employment designations (in Hackney's case, Priority Employment Areas) are aimed at ensuring where viable, that new developments maximise new commercial floorspace. The present probability estimates assume that sites within designated employment areas will come forward for majority residential elements.

Is there any detail, as of yet, as to how/if the GLA will be monitoring these sites over the period?

Thanks,

[REDACTED]

Consultation Response to the GLA's Draft SHLAA Methodology

This is a joint response from the Hertfordshire Infrastructure & Planning Partnership to the Greater London Authority consultation on their draft SHLAA methodology.

The Hertfordshire Infrastructure and Planning Partnership (HIPP) is a partnership that represents all ten District/Borough Councils and the County Council in Hertfordshire. This response is based on a separate response from Welwyn Hatfield Borough Council.

Below is a table setting out the concerns of HIPP. (For succinctness, National Planning Practice Guidance on Housing and Economic Land Availability Assessments is referred to as NPPG)

Draft SHLAA Methodology	HIPP response	Suggested change to the draft methodology
The next London Plan will need to be informed by a Strategic Housing land Availability assessment (SHLAA)	Consistent with NPPG, the next London Plan will need to be informed by a Housing <u>and</u> Economic land Availability Assessment. Reference is made at paragraph 1.8 to an already completed Industrial Supply Study and an Industrial Land Demand Study which is underway. It is not clear from the draft methodology if this extends to other employment uses such as offices	Consistent with the NPPG, consider reporting on a combined Housing and Employment Land Availability Assessment (HELAA) as part of the same exercise in order that sites may be allocated for the use which is most appropriate. Clarify in the SHLAA methodology if only Industrial land is to be reviewed or whether this extends to other employment uses such as offices.
Para 1.1: The study will cover a 25 year period from 2016 to 2041	Support this approach	No change
Para. 1.2: Approvals include non-self-contained housing e.g. student accommodation and specialist housing for older people	Is the intention to make an allowance for approvals based on a ratio to convert non self-contained housing to housing numbers? If so, what ratio will be applied and on what basis?	Clarify what ratio is to be applied to convert non-self-contained accommodation to dwelling numbers. If this is not what is intended, clarify what is the intention.
Para 1.12: Confidentiality of potential sites	The SHLAA should identify whether sites are suitable, available and achievable and should include an outline plan of each site.	NPPG sets out the Core Outputs which includes a list of sites cross referenced to locations on maps. The assessment should be made publicly available.
Para. 3.1 – the approach is tailored to London's pressurised market where 98% of housing is delivered on brownfield sites and other sites in active use	Stage 1 of the methodology set out in NPPG does not restrain land availability assessments to land that is already previously developed. All available types of sites should be considered. Sites which have particular policy constraints should be included in the assessment for comprehensiveness. The appropriateness of any constraints should be tested and assessed against national policies and designations to establish which have a reasonable potential for	The assessment should not be restrained by previous tailored approaches. All sites should be considered. This does not mean that all suitable, available and achievable sites will ultimately be allocated for development. The task is to select the most sustainable sites in light of the need to meet FOAN unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when

Hertfordshire Infrastructure & Planning Partnership (HIPP)
Response to the GLA consultation on the Draft SHLAA Methodology

Draft SHLAA Methodology	HIPP response	Suggested change to the draft methodology
	development.	assessed against the policies in the NPPF as a whole.
<p>Para. 3.7 – sites classified as unsuitable and deemed to have a zero per cent probability for development. The list includes Green Belt and Metropolitan Open Land.</p>	<p>HIPP strongly objects to the assumption that the Green Belt should be deemed to have zero development probability.</p> <p>To do so would be pre-empting decisions that will need to be made in taking forward the London Plan.</p> <p>NPPG advises that land availability assessments should identify <u>all</u> sites and broad locations <u>regardless</u> of the amount of development needed.</p> <p>Further, “<i>Sites, which have particular policy constraints, should be included in the assessment for the sake of comprehensiveness ... An important part of the desktop review, however, is to test again the appropriateness of other previously defined constraints...</i>”</p> <p>NPPG contains a long list of sites that may be relevant to the assessment, this includes agricultural buildings, sites in rural locations, sites in and adjoining villages, potential urban extensions and new free standing settlements.</p> <p>Sites in the Green belt are not excluded from the assessment potential.</p> <p>Stage 2 of the NPPG methodology advises that plan makers will need to consider the appropriateness of identified constraints and whether such constraints could be overcome.</p> <p>Stage 5 of the NPPG methodology reflects the NPPF. Once established, Green Belt boundaries should only be altered in exceptional circumstances through the preparation or review of the Local Plan.</p> <p>London has not yet established one way or another whether or not exceptional circumstances exists to alter Green Belt boundaries</p>	<p>The methodology should acknowledge that rather than simply accepting previously defined constraints, they should be tested.</p> <p>The Green Belt is not a landscape or wildlife designation, such as an AONB or an SSSI, it is a policy constraint that was previously defined.</p> <p>Local Planning Authorities around London are faced with the challenge of meeting housing needs and Green Belt boundaries are being reviewed due to insufficient supply from urban and other sources.</p> <p>It is simply not acceptable for the GLA to have a blanket ‘zero’ approach to Green Belt sites.</p> <p>The challenge is to find the most sustainable sites and by discounting immediately Green Belt sites means that the GLA SHLAA will not be a comprehensive assessment of land availability.</p> <p>It is important to remember that just because a site is found suitable, available and achievable in a SHLAA does not mean it will be allocated for development in a development plan but to exclude all such sites will mean that the London Plan will not be based on a proportionate evidence base and may run the risk of not being found sound.</p>
<p>Paras. 3.11 and 3.12 – probability assumptions for Industrial Land may need to be revisited</p>	<p>Agree – the assumptions should be revisited following the Industrial Land Demand Study.</p>	<p>Add a caveat that a London borough would only be able to alter the probability assumptions that would result in locally designated employment sites being released for housing where they have an up to date Economy Study and Employment Land Review which indicates that there will be sufficient land to meet the long term employment needs of the borough and that no significant shortfall in employment land would arise as a result of the release, either individually or cumulatively.</p>

Hertfordshire Infrastructure & Planning Partnership (HIPP)
Response to the GLA consultation on the Draft SHLAA Methodology

Draft SHLAA Methodology	HIPP response	Suggested change to the draft methodology
Table 8 – Land ownership constraints	<p>The maximum reduction in probability is set at 20% - suggest that in certain cases, the probability reduction could be much higher.</p> <p>Land Registry data is a starting point only. Should land be in multiple ownership or if Land Registry data indicate constraints that may not be possible to overcome, then a higher reduction may need to be applied. Not to do so could be over-estimating the deliverability of certain complex sites.</p>	<p>Site promoters should be required to identify and clarify any complex land owner matters so that the GLA can demonstrate that there is a reasonable prospect that sites could be delivered.</p> <p>Allow for a higher impact on probability where complex land ownership issues arise and where a doubt remains that such matters could be overcome by 2041.</p>
Para. 3.25 – 400 sites classified as unsuitable due to ownership	<p>Land ownership is not a suitability assessment, it is an availability and achievability assessment. A site could be suitable (free from physical and environmental constraints) but may not be available if not all landowners are willing or deliverability achievable if legal constraints affect a site.</p>	<p>Clarify that land ownership relates to availability and achievability, not suitability.</p> <p>If the concerns of the GLA is that too many sites were dismissed because of land ownership issues, then this supports the need to work with site promoters to assess if there is a reasonable prospect that constraints could be overcome.</p>
Para. 3.28 – boroughs will consider if policy constraints can be overcome	<p>Green Belt should be added to the list in Table 9.</p> <p>In exceptional circumstances, Green Belt boundaries can be altered.</p> <p>Whether or not the GLA considers that exceptional circumstances exist, a Green Belt site could be suitable.</p> <p>Such a site would however only be allocated if exceptional circumstances were to exist, if a site was considered the most sustainable option against all reasonable alternatives and then removed from the Green Belt.</p>	<p>Add Green Belt sites to the list in Table 9.</p> <p>They are constrained by a policy that could be reviewed should exceptional circumstance exist to do so (a separate decision).</p>
Para. 3.34 – Listed buildings or scheduled monuments / primary and secondary schools excluded	<p>Refer to para. 132 and 133 of the NPPF. If development would result in substantial harm to or total loss of significance of a designated heritage asset (or its setting), consent should be refused unless the substantial harm or loss is necessary to achieve substantial public benefits that outweigh the harm or loss.</p> <p>It therefore follows that if such a circumstance exists, a site should not be considered suitable in the SHLAA</p> <p>Schools are automatically excluded in paragraph 3.34 but then allowed for in limited circumstances in paragraph 3.35 where a programme is in place. The SHLAA may need to consider with the</p>	<p>The first test in the 5th bullet point should relate to substantial harm or loss of significance of a heritage asset.</p> <p>Even 'sympathetic' enabling development could result in substantial harm to the setting of a heritage asset.</p> <p>Consider the potential for housing on school sites in liaison with the relevant education authority.</p>

Hertfordshire Infrastructure & Planning Partnership (HIPP)
Response to the GLA consultation on the Draft SHLAA Methodology

Draft SHLAA Methodology	HIPP response	Suggested change to the draft methodology
	relevant education authority whether between 2016 and 2041 further school sites, e.g. those that are no longer fit for purpose because either the buildings have reached the end of their practical life or the site is not big enough to accommodate expansion needs are likely to come forward for redevelopment, which may include some opportunities for housing	
Para 3.45 – boroughs may consider office sites as suitable if they are likely to come forward during the plan period.	The suitability of office sites for housing should be assessed in light of a proportionate evidence base on the forecasts needs of the economy.	Add a caveat that a London borough would only be able to alter the probability assumptions that would result in office sites being released for housing where they have an up to date Economy Study and Employment Land Review which indicates that there will be sufficient land to meet the long term employment needs of the borough and that no significant shortfall in employment land would arise as a result of the release, either individually or cumulatively.



Thank you for the opportunity to comment on the draft SHLAA methodology. The London Borough of Islington's (LBIs) comments can be found below.

Whilst it is proposed to continue with the broad basis of the previous SHLAA methodology there are some key differences and assumptions that are a cause for concern. The key aim of the SHLAA as stated in the PPG should be to identify a future supply of land which is suitable, available and achievable for housing. In order for the SHLAA to be robust it needs to be based on realistic assumptions. Whilst it is understood that in some circumstances the previous SHLAA may have led to the underestimation of the capacity of some sites the previous methodology was considered robust by the GLA and has stood up to scrutiny. The proposed changes, if applied inflexibly and not carefully managed, run the risk of undermining this robustness if the ability to properly assess capacity of sites is unjustifiably restricted. Some of the changes also run the risk of damaging existing local policies and their implementation – for example the inability to exclude sites where housing is not considered acceptable, or the inability to properly reflect the mixed use nature of a site.

This response outlines several concerns and suggests changes to address these concerns. We request that the GLA properly considers this response and amends the SHLAA methodology accordingly, otherwise there is a real possibility that the SHLAA itself will not be fit for purpose and will undermine boroughs' planning functions, particularly with regard to Local Plan reviews and five year land supply (often a key issue in the determination of planning applications and planning appeals).

It is also clear that some further work with implications for site specific assumptions will be undertaken separately from the SHLAA (e.g. industrial land scenario testing). It is imperative that boroughs are involved in these other pieces of work, if the assumptions arising from this work feed into the SHLAA and therefore could have significant implications for local policy implementation and creation. In the spirit of collaboration and transparency (which is central to the SHLAA process as it currently operates) there should be a clear process for borough engagement and feedback on any work which could affect capacity estimates in the SHLAA.

Allocations

It should be clarified if there will be potential to exclude allocated sites where they are allocated for uses other than housing/mixed-use. LBIs site allocations are not disaggregated according to land use and there will be some that will be allocated for other uses that would be clearly inappropriate for residential use. Boroughs should be able to reflect what site allocations are seeking to achieve. If we are not able to exclude sites allocated for non-housing development or reflect an appropriate mix of land uses as per the site allocation we no longer have a plan-led system. If there is going to be no opportunity to exclude site allocations for other uses within the system we would request that we are able to provide an updated list of site allocations for the borough which only includes those sites over 0.25ha, are allocated for housing/mixed-use development and excludes sites that have already been delivered.

Circumstances on some of our allocated housing/mixed-use sites have changed, for example lease extensions for existing firms and engineering reports which evidence that constraints cannot be overcome, which mean that there is now zero chance of sites previously allocated with the potential for housing to come forward. The SHLAA should allow for such sites to be excluded where such circumstances exist; or at the very least, there should be flexibility for re-phasing these sites to later phases or classifying these sites as 'low probability'.

Unlike the 2013 methodology it is now proposed to use notional capacity for allocated sites, with no ability to apply constraints. It is suggested that the previous methodology underestimated the potential for housing delivery – it would be useful for a summary of this evidence to be included. The fact a site is allocated does not mean it has no constraints. Whilst it may be reasonable to assume the notional capacity on some sites, there should also be flexibility to include more constrained sites based on their potential/probability of coming forward. In short, the same process that applies to non-allocated sites should continue to apply to allocated sites. All sites, regardless of whether or not they are allocated, will be individually assessed. The only possible reason for automatically assuming notional capacity would be to simplify the SHLAA process by removing the requirement for assessment, but the GLA do not seem to be suggesting this (and such an approach would be flawed in any case).

Based on past experience not all sites allocated for housing will come forward, therefore it is illogical to elevate these sites to a higher plane of deliverability solely because they are allocated. Whilst it is understood that land uses and phasing can be amended there will be some sites that are very constrained. Therefore it should still be possible



to take a constrained probability based approach for allocated sites. Site specific assumptions should be based on robust evidence so as not to unduly underestimate the contribution of site allocations and, in general, the higher likelihood of them being delivered.

Town centres

Whilst there is a general approach for additional housing intensification within town centres the methodology should also be flexible enough to take into account individual circumstances – for example some Town Centres are particularly sensitive to high density development (e.g. due to heritage constraints); while in other cases there may be local policies which look to prioritise other uses. Local Plan policy for Angel Town Centre, for example, is clear that the significant introduction of new residential accommodation will be resisted. This is in recognition of the fact that there are very few development sites within the town centre, heritage constraints and that the priority on these sites should be for retail/employment/business space as appropriate. The SHLAA methodology and any subsequent assumptions for sites should not be so rigidly applied as to undermine the implementation or effectiveness of Local Plan policies.

The presumption that most development in town centres will generally be higher densities is considered generally appropriate. However, we believe it is essential that there is scope within the methodology to take account of circumstances where this might not be appropriate in relation to specific Town Centres, for example where there is specific local evidence such as an up-to-date characterisation study or retail capacity studies. Paragraph 2.11 of the methodology suggests this is the case. It might also be helpful to consider the town centre's overall health – so, for example, consolidate existing uses and residential intensification in town centres where they are deemed to be in poorer health.

Density assumptions in opportunity areas

Some Opportunity Areas (e.g. City Fringe/Tech City) are office focused and GLA guidance, such as the CAZ SPG, supports this. There should not be blanket higher density assumptions across all OAs; rather there should be a reflection of specific context of OAs.

The central+ assumptions seem to be arbitrary uplifts on the central part of the density matrix, with no obvious explanation of how they were arrived at. It would seem sensible to use something tangible to gauge the additional uplift (the central+ figure), whether that is development trends or a static percentage figure. Whatever approach is used must be transparent and have some logic to it. Arbitrary uplifts undermine the robustness of the SHLAA process.

Paragraph 2.9 states that the density estimates are set below the average densities of approvals on large sites in opportunity areas; however in many cases they would appear to be similar if not above the average approval densities. Within this context it is not clear how the potential for over-estimation has been mitigated. The supporting text also suggests using OA capacity studies to inform assumptions. We are not aware of any in relation to Islington's OAs and would reserve the right to view and comment on any that do exist before using them.

Borough amendments to density estimates

In order to help ensure assumptions are robust and are likely to be deliverable it will be important that boroughs can make amendments to density estimates where these are based on evidence and can be justified. Whilst there will be site specific information in some cases, it should also be possible to take into account other relevant strategic pieces of evidence, for example, borough wide characterisation studies, or evidence around potential constraints. Paragraph 2.11 of the methodology suggests this is the case but we seek confirmation that this is not an impossibly high bar.

Industrial Land Scenario testing

It is understood from the methodology that industrial land scenario testing will be carried out as a parallel exercise and that estimates on industrial sites in the SHLAA may be potentially revisited in order to align the SHLAA with the preferred approach in the new London Plan. This raises concerns that figures that are considered to be robust and reflective of local considerations are subsequently changed outside of the borough site assessment process. If assumptions on industrial land are changed as part of the London Plan this should be based on discussions with boroughs and based on the realistic capacity of sites as well as local policies. The *tipping point* or *trend based*



scenario could have significant implications for Islington which has lost significant amounts of industrial land over recent years and now has only one Locally Significant Industrial Site. It should be made clear how boroughs will be involved in the industrial land scenario testing process and how they will be included in any revisiting of SHLAA assumptions. Depending on what is assumed there is a concern that any assumptions of loss of further industrial land as part of theoretical exercise will not adequately consider local circumstances, constraints and the implications of this for local policies. It should be made clear how the level of industrial land release for each borough will be considered and how the boroughs will be involved in this.

Islington's Employment Land Study (consistent with our planning policies) suggests that we should not lose any more industrial land. Instead we should seek to intensify industrial sites to provide for jobs growth including hybrid space, flexible workspace and other b-use spaces which are in great demand.

Density and character settings

LBI object to the inability to change the character setting map as per the previous SHLAA methodology. Whilst it is appreciated that having an automated setting in many circumstances will be correct, this will not be the case in every circumstance. Using a study on which there has been no borough consultation as an unquestioned baseline for density is concerning, particularly when there is no opportunity for local knowledge to be used. There should be some flexibility to change character settings on a site-by-site basis, supported by relevant local evidence such as characterisation studies.

The methodology proposes a 1km 'networked buffer' from town centre boundaries and it is suggested that this reflects actual walking distances. The networked buffer approach makes sense more than the previous 'as-the-crow-flies' approach; however, there is no sensible justification for increasing the distance from 800m to 1km. The methodology cites the ARUP density study which suggests that the previous 800m buffer was based on an average walking speed of 1.3m/s; however, the report then suggests that average walking speed in London is faster at 1.6m/s. This faster walking time is based on extremely out of date evidence from 1989.

Recent research by Living Streets highlights that a continued walking speed of 1.3 m/s continues to be appropriate – this is consistent with the TfL walking speed for PTAL assumptions. It would seem logical to use the same assumptions as transport for London and on which the PTAL maps that are used to apply the London Plan Density Matrix are based. For the ARUP study to use such outdated research as one of the primary justifications for a greater buffer over and above the assumptions that are used by TfL raises serious concerns about the accuracy of the revised character settings, particularly when the local ability to interpret and validate them is removed.

The revised character setting map puts virtually the whole of the borough of Islington into a central setting. This simply is not the case. Whilst many parts of Islington could be considered to be in a central setting there are also many parts that aren't. The ARUP report also highlights that there is no established rationale for assuming that 75% flats should mean that an area can be deemed to be central. This does not have regard to any of the other characteristics which might help to determine the character of an area.

The fact that different PTALs can be assumed does not mitigate for the fact that some areas that would clearly be urban in character will now be forced to be considered as central despite the fact their character, based on local knowledge, would clearly suggest otherwise. This would appear to be an extremely crude way of applying what is already a crude tool.

There are large areas of the borough that ordinarily would fit within a suburban setting (and that are identical to the picture of low rising housing with a density of 65 dwellings per hectare underneath table 1 of the methodology). Due to the fact that this housing is commonly occupied as flats or is in proximity to town centres, such locations would normally be elevated to an urban setting. However, under the revised character settings they will now be elevated even further to a central setting. The current London Plan density matrix definitions of central, urban and suburban should continue to be able to be applied. There is no justification for relying so heavily on evidence which has been through no consultation exercise, especially when the evidence is elevated over and above policy and guidance in an adopted document that has been through independent examination and extensive consultation.

We consider that a 'blended' approach is most suitable, utilising the networked buffer based on a walking speed of 1.3m/s but with all other elements from the previous methodology. There should be opportunity to manually change



the character setting if an area/site can be evidence to be different in a different character setting based on local knowledge. If the ARUP study is intended to be used in such a mechanistic and crude way then boroughs should have the chance to scrutinise and respond to its findings and these responses taken into account. This is particularly important as the study is likely to be used by developers to justify higher densities in areas where they may not otherwise be acceptable. The fact that it has been used to inform the SHLAA could artificially give it greater weight than would otherwise be the case.

Industrial Land

Table 6 identifies the probabilities to be assigned for housing in Locally Significant Industrial Sites and other non-SIL industrial/employment sites. Even in the case of restricted transfer boroughs, the constrained capacity is considered very high, given the unique function of these areas and their relative scarcity following years of significant losses. Where sites are allocated/designated for business uses (particularly B1c, B2 and B8 in this case) and there is a clear policy against the introduction of residential use in such designated areas, there should be scope for sites to be deemed to be unsuitable and the probability reduced to zero.

Paragraph 3.12 states that boroughs will be able to amend the notional probability, for example where they consider an LSIS should be protected. It is not clear the extent to which sites can be excluded where this is case, as with SIL designations. This is inconsistent with the Land for Industry and Transport SPG (GLA, 2012) which affords LSISs designated in conformity with the London Plan the same degree of strategic protection as SILs (para 4.9). If the methodology does not allow for this the SHLAA would jeopardise local plan policies which offer clear protection of such areas and consider that housing is not appropriate.

Industrial swaps will be very specific and should not be part of general scenario testing. Boroughs where swaps are possible can reflect this through individual site assessments.

It is considered that the environmental setting constraint is particularly useful with regard to industrial sites, as it allows the function of such areas to be considered in terms of how it would interact with future residential uses. This is discussed below.

Planning policy constraints

In addition to an amended approach to industrial/employment sites mentioned above, LBI consider that the CAZ should be flagged up as a planning policy constraint; or at the very least there should be greater flexibility with the mixed use constraint in CAZ locations. The CAZ SPG provides clear guidance on the priority that should be given to commercial uses and how the mixed use policy should operate so including the CAZ makes sense from London Plan perspective.

In addition, in assessing sites boroughs should be able to reflect their latest up-to-date evidence. Islington has recently undertaken a comprehensive Employment Land Study (2016), which has identified a forecast growth of 50,500 jobs in Islington up to 2036. 60% of these are within sectors requiring office space resulting in the need for 400,000 sq m of additional office floorspace, the majority of which should be in the CAZ. This is against the backdrop of current planning pipeline of permissions that will generate a net loss of 12,000 sq m of office space. This is in large part due to the impacts of the office to residential permitted development rights, as well as the incremental loss of older, often smaller, office premises in the CAZ. Demand for office space, particularly in the CAZ, outstrips the supply, vacancy levels are low and the rent levels are fairly. Clearly this is a barrier to future economic growth.

The Employment Land Study also recommends that residential development in the CAZ should be resisted. This is a reflection of the overall state of play in terms of demand and supply of employment premises in the CAZ. It is worth noting that when it comes to housing delivery, the borough has exceeded its high housing targets for many years and we have a healthy housing land supply which will enable the borough to continue to exceed the housing targets in the future.

Consideration could also be given to plotting conservation areas as a constraint.



Environmental Constraints

Two categories have been removed compared to the 2013 methodology. Table 7 no longer includes air pollution or road noise pollution. No explanation has been provided for the change. It is reasonable to assume that where air and noise pollution are a factor this might have an impact on the capacity of sites due to the need for design to mitigate the impacts of this, for example additional set-backs, amended layouts or additional non-residential uses on certain parts of the site. This should therefore still be a relevant consideration in estimating the realistic potential capacity of sites. There is a lot of data on air pollution which would allow this to be added as a constraint with reasonable accuracy with the level of constraint increased depending on the severity of pollution. If it is not proposed to add this to the system then boroughs should be able to take this into account based on local information, perhaps with some greater allowance for a higher mix of uses on site or later phasing of such sites to reflect the fact that there may be barriers to implementation.

Delivery constraints

Table 8 excludes the environmental setting category that was included in the 2013 SHLAA local constraints table. No explanation has been provided about this in the document. This constraint is considered to be important in assessing the capacity of sites and should continue to be included. This constraint considered if the setting of the site had the potential to constrain its development, including taking into account neighbouring uses and the likelihood of them being discontinued. This can be an important factor in considering the introduction of residential uses in a certain area.

The area around proposed residential sites and whether introduction of residential use would affect those established use should be considered and is particularly important for certain uses, for example, industrial and night time economy uses. The Mayor has made a number of announcements about the impacts of 'agents of change' which dovetails with this constraint; it therefore seems strange that it has been omitted. The government's amendments to GPDO allow noise to be taken into account as a consideration in office to residential Prior Approvals illustrates that it is considered to be an important issue by central government too.

If the environmental setting constraint is not included, then its constituent parts should be. In particular, there would need to be a constraint which considers operations of existing adjoining uses, particularly where these are noise generating; and impacts of a use beyond the site boundary, for example servicing and logistics requirements related to industrial uses, which may necessitate 24hr vehicle movements and cause disturbance for any new residential uses in the vicinity.

Local infrastructure isn't necessarily something that can be more easily mitigated than land ownership issues, as stated in paragraph 3.22. There can often be great uncertainties around this, particularly timing and funding of infrastructure. There should be scope to have a high level of constraint for local infrastructure.

There is a lack of evidence to say that mixed use development in Town Centres is potentially underestimated just because there were a lot of ownership constraints raised in the last SHLAA. It may be useful to have a more nuanced and tapered constraint which takes into account several factors about ownership for example number of owners, difficulty of site assembly, leasehold interests etc.

It is stated that boroughs will not be able to set the constraint to unsuitable for any delivery constraints on potential sites, as they are all considered to be capable of being addressed during the course of the SHLAA period (2016 to 2041). Whilst in the majority of cases delivery constraints are likely to be able to be overcome within the SHLAA period there will be some sites where this is not the case – for example engineering reports which evidence that intensification cannot happen or where site owners have made a decision regarding lease arrangements which means that there is strong evidence that the site will not come forward before 2041. In these situations, and where there is clear evidence, there should be flexibility within the system to discount and exclude such sites in order to ensure the continued robustness of the SHLAA system and housing numbers derived from this.

Overcoming constraints

Whilst for some constraints the solutions to overcome them will be obvious and can be based on credible information, other ways of overcoming constraints are likely to be more speculative and theoretical and may not actually happen. For example, whilst a site in fragmented ownership could be assembled, on some complicated sites



where there is no intention to CPO this can be very unlikely to happen. It would be useful for the SHLAA to give examples of the type of evidence that will likely overcome constraints (e.g. funding programme, CPO programme, masterplan, etc); the inference of this is that where such evidence is not available, constraints are more likely to be legitimate.

SHLAA phasing

Paragraph 3.30 states that boroughs will be able to refine phasing information. It would be useful for this to be clarified and made more explicit. Phasing information should not be rigid. There should be freedom for boroughs to amend the phasing of sites based on information and local knowledge. For example, there will be a number of sites with permission that have not yet started but which will deliver significant numbers in phase 1, whereas the default place these permissions in phase 2. Flexibility in the amending of phasing will allow for site specifics to be taken into account.

Housing targets

Annual monitoring targets based on five year periods would provide flexibility compared to year-on-year monitoring which is more sensitive to fluctuations. However, consideration should be given to the individual circumstances of each borough – 5 year phasing will make sense for boroughs who are reliant on large sites more than boroughs who have a strong element of windfall supply. It would be useful for boroughs to consider what the best approach is likely to be based on different scenarios and data. The focus should be delivery over the whole monitoring period so as not to potentially arbitrarily punish boroughs if anticipated delivery within a certain phase does not come forward. For example, it could be that a significant proportion of delivery is allocated to phase 2 as this is when a particularly large site is likely to come forward, however flexibility is required if there are delays beyond the local authority's control and delivery then happens within phase 3. Supporting guidance should make it clear that it is overall delivery against the plan period target that is the most important thing, with boroughs demonstrating how they will achieve this through their housing trajectories. It would be helpful to allow boroughs to comment on a more detailed methodology to consider the different options and accompanying guidance.

Careful consideration should be given the extended minimum targets to 15 years. From experience there is considerably less certainty about sites in years 10-15 and it can be difficult to have identified sites for this period. This element of the trajectory often relies more heavily on windfall sites and can therefore be more theoretical and subject to change. There is also no requirement, as per the NPPF, to have identified sites beyond 10 years. If 15 year minimum targets are proposed consideration should be given to the confidentiality of sites within this phase.

With regards to the proposed delivery test, while we agree that this is arbitrary, it will likely still be based on whatever annualised average can be calculated, i.e. DCLG will annualise the five year target for any period. This could actually penalise boroughs whose delivery is heavily weighted to phase 2 and 3, as the annual average will be much higher. It may be sensible for the purposes of the delivery test to specify an annual average across the whole plan period target, or specify that it is up to boroughs to determine best monitoring approach, as outlined in AMRs.

Excluded sites

For recently completed development not in residential use, this should have the same date as new build housing – since 2003. Whilst the new build development category may be suitable for some uses, there will be other uses that will have been developed before this time but still have zero chance of coming for housing development based on local knowledge – for example health care uses or industrial sites. There should be scope to exclude such uses where it can be demonstrated that there is local policy that prevents residential development on the site or through landowner engagement, for example.

In addition to the ability to exclude office sites in defined commercial core areas, there should be the ability to exclude sites in other areas that are allocated or protected for business use only and where office to residential permitted development rights have been removed, for example. Without the ability to do this there is an inconsistency in only allowing some office locations to be excluded. Assigning low probability status to sites that are robustly protected from residential use risks jeopardizing existing policy designations as well as the robustness of the methodology in arbitrarily including sites that, based on robust evidence and policy, have zero chance of coming forward for housing. For consistency there should be an option to exclude office sites where this can be justified.



The excluded sites section mentions that a number of public sector landowners and utility providers have submitted sites through the Call for Sites. The methodology states that these sites should not be excluded by boroughs based on the fact they are in operational infrastructure use and should be considered as potential sites. It should be clarified that such sites can still be excluded where they are unsuitable, are subject to severe constraints and will not come forward for housing. Some of the sites put forward in the Call for Sites can be speculative and may be less likely to come forward, in this case it might be useful to have constraint which recognises their lower probability rather than exclude them altogether.

The assumption that sites submitted via call for sites are not constrained (particularly operational infrastructure sites) is flawed. Sites put forward by TfL and Thames Water in Islington highlight this point, given that they clearly state that sites have operational/technical constraints with no idea whether these can be overcome. The most important thing is that there is flexibility to allow for local evidence of site specific circumstances to be taken into account so delivery figures are neither overestimated or underestimated.

Offices

Please see response under excluded sites above. Recently completed offices should date from 2003 rather than 2010 for consistency with housing sites.

Low probability sites

Whilst the methodology states that it is up to boroughs whether they publish details of these sites, the approach could pose serious problems for demonstrating supply to meet London Plan housing targets. Our approach to housing trajectories to date has been to publish the details of all large “known sites” which make up the 15 year supply. Where low probability sites make up a significant proportion of housing supply it would be difficult to justify withholding site specific information as boroughs will be required to demonstrate how they will meet their housing targets. Even if we chose not to release details of low probability sites, we might be forced to do so under FOI requests or at examination. Releasing this type of sites into the public domain is likely to be very controversial and create local backlash against new housing growth.

We would suggest that at the very least low probability sites should only be accounted for in phase 5 as phases 3 and 4 will generally have to be disclosed as part of boroughs housing trajectories and could damage the implementation of other local plan policies. We would recommend that low probability is a separate generalised housing stream rather than site specific, similar to small sites windfall, although underpinned by actual assessments. Alternatively a theoretic trend based figure could be applied to excluded sites and added to individual targets.

Scenario testing

The key point with regard to scenario testing is that there is little point in boroughs going through a lengthy and detailed site assessment process if numbers are going to be arbitrarily changed. Where scenario testing will directly affect outputs – i.e. the boroughs housing target, boroughs should be involved in this testing, particularly those with significant implications. For Islington this is likely to include industrial land release as well as station intensification areas and areas within 1km of town centres. The latter is a particular concern given the evidence used to support this, as mentioned above. Boroughs should also be involved in discussions on use of the LSE model if this is to be used to inform borough capacity.

Any assumptions related to transport infrastructure need to be conservative, given uncertainties and long lead in times of such projects. In the case of several large projects mentioned, e.g. Crossrail 2, Bakerloo line, there is not even an agreed business case let alone funding.

With regard to potential future scenario testing on small sites, brownfield registers and PIP in qualifying documents are for 5+ unit schemes, hence it is likely to be relevant more for large sites; therefore utilising these to inform small sites trends is unlikely to be relevant or accurate. With regard to small sites registers, as these will be purely indicative and will have no material weight they shouldn't be used to inform housing numbers.

Small infill opportunities tend to be very site/location specific; therefore careful consideration is needed on a site by site basis. This stream be accurately assessed through blunt scenario testing.

Confidentiality

The general approach to confidentiality of all potential sites is supported. It is stated that it will be up to boroughs to disclose information e.g. through their housing trajectories. Within this context the methodology and outputs should support the confidentiality approach. There is a possibility that significant increases in housing targets or disproportionate reliance on 10-15 year supply to meet targets are likely to require published justification. This could compel boroughs disclose site information in order to demonstrate how housing delivery can be met. This could in turn compromise planning objectives and local policies. It would be useful for the GLA to have developed a comprehensive and robust public facing position on this to help protect boroughs in this situation; this could potentially include legal advice. The approach to low probability sites should also be confirmed – if these sites significantly contribute to 10-15 year supply there could also be requests for them to be disclosed.

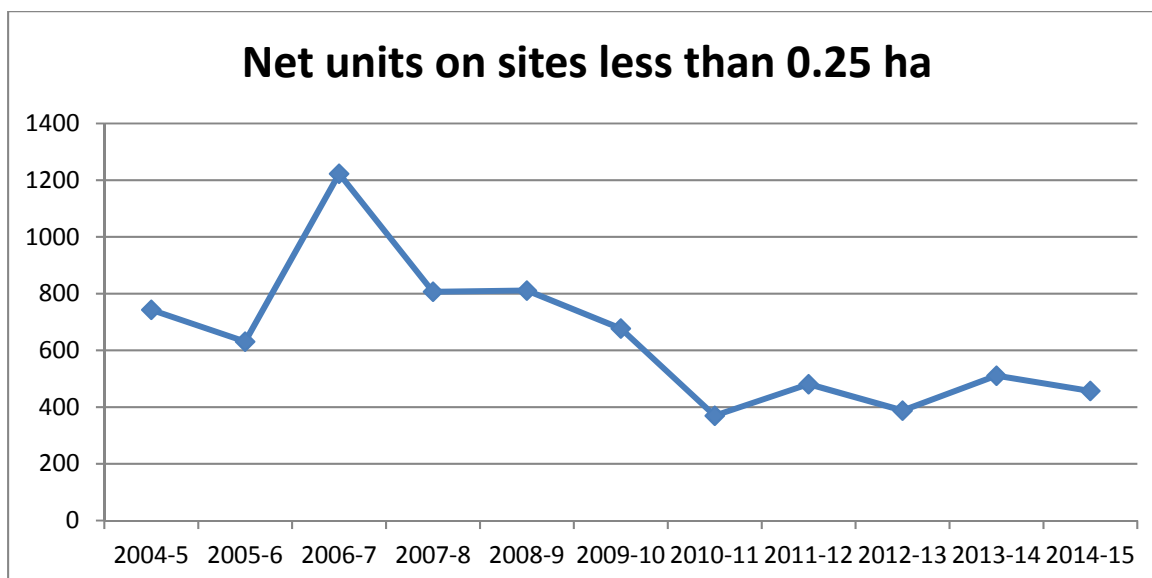
Non-self contained (NSC) housing

LBI are supportive of the continued recognition of NSC housing as part of net housing delivery and continuing the current approach of counting each non-self-contained bedroom as a separate unit for monitoring purposes, particularly in the absence of any robust evidence that there should be a change to this approach. However, it will also be important to consider the potential LPEG response where it was mooted that NSC would no longer count towards housing targets. The methodology should be future proofed against such changes by clearly setting out why it will continue to be appropriate to account for NSC accommodation as part of housing supply within London.

Small sites

The NPPF is clear that any allowance for windfall should be based on evidence that such sites have consistently become available and will continue to provide a reliable source of supply and should take into accounts historic windfall delivery rates as well as future trends and not include garden land.

LBI recognises that small sites can play a valuable role and whilst we understand the logic of looking back over the last 10 years it is also important to understand and recognise the context of more recent changes. A large proportion of Islington's housing supply has come from small sites over a long period of time; however recent evidence suggests that this source of housing supply is declining as evidenced in the graph below:



The average net delivery of self-contained accommodation in the last 5 years is over 200 units per year less than the current windfall assumption in the last SHLAA of 662 – this hasn't been achieved since 2009-10. This decline is due to the fact that intensification of the majority of the boroughs small sites has already happened with many houses being converted into flats as well as sites for infill developments being utilised. We do not consider the decline to be a short term market fluctuation, but rather more of a structural issue with the boroughs housing supply.

A long-term average should not automatically be used – anomalous years and overall development trends should also be considered in order for windfall assumptions to be robust and reliable and in considering future trends.



Boroughs such as Islington should not be set artificially high targets for this element of their supply based on historical achievements, as historic years of high delivery skew the average figure. If boroughs can provide evidence that there are important factors which would warrant giving greater weight to particular shorter term trends then this should be taken into account.

Paragraph 5.6 suggests that small sites data will be provided to boroughs to check the data for accuracy and anomalies before Christmas. We have yet to receive this but would like the opportunity to review and comment on this and how it should be used to inform future assumptions. Small sites assumptions should be developed in consultation with boroughs.

Vacant Homes

LBI support not considering vacant homes brought back into use as part of housing targets. There are several reasons why it is no longer considered appropriate. Firstly, vacant properties and bringing them back into use is outside of the control of the planning system and so should be considered separately from housing delivery secured through planning. Secondly, and importantly, the proxies to estimate vacant properties via council tax data are increasingly unreliable since national changes to council tax vacancy criteria in 2013. Changes via the Localism Act reduced the exemption codes that apply to empty properties and the ability to apply for discounts. This means it is more difficult to reliably monitoring long term vacant properties based on council tax data and there is less incentive for property owners to register their properties as vacant. Using data on vacants can show big year on year fluctuations which are not a reflection of what is happening on the ground but rather the arbitrary and misleading categorisation of properties for a separate process which is not related to planning. We are therefore fully supportive of this issue being considered separately such as through the Mayor's housing strategy.

Landowner engagement

It would be useful for the approach to this to be clarified.

Strategic Planning Team

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Email: localplan@kingston.gov.uk

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██████████
Senior Strategic Planner
Greater London Authority
Response sent via email

20 January 2017

Dear ██████████

Consultation on the Draft GLA SHLAA Methodology

Thank you for your consulting the Royal Borough of Kingston upon Thames on the above consultation. Please find below our comments on some of the topics within the draft methodology.

GLA Call for Sites

As part of our preparation for a new Local Plan we will be running our own Call for Sites exercise to be run alongside our Issues and Options consultation. This is scheduled to run from April to May and will consider sites proposing all land uses, not just residential use. We intend to share all the sites proposing residential use with yourselves, including GIS shapefiles and supporting documents. We are aware that our Call for Sites will be finishing at a time when you will want us to be completing the review of GLA SHLAA sites, but we trust that any new sites you receive from us will still be considered prior to finalising the GLA SHLAA?

Density Estimates

Please can you share the PTAL maps for 2011, 2021 and 2031 and a schedule of any committed transport schemes that will affect Kingston upon Thames as soon as possible. Please can you also share the character settings map with us as soon as possible as well.

Planning Policy Constraints

Please can you provide an explanation of the proposed probability scores for all planning policy constraints.

Delivery constraints

Please can you provide more detailed guidance on how boroughs should classify sites in terms of

delivery constraints.

Housing Targets

We support an approach which breaks the annual monitoring targets down to five-year phasing periods. This could help boroughs potentially avoiding not having a five-year housing supply if the majority of their housing capacity is expected to be delivered after the first five years of the plan period.

Emerging Opportunity Areas

Please can you provide clarification as to what density assumptions you will be using for emerging Opportunity Areas: Will they be the same as the densities proposed for the Opportunity Areas already designated in the London Plan?

Small Sites

Please can you provide clarification on whether or not you will also look at housing unit numbers when it comes to sites under 0.25ha as sites under this size often have capacity to make a significant contribution to housing delivery, including for example non-self-contained housing. Likewise, there may be sites over 0.25ha that may only contain a single dwelling. We also question why 2015/16 completion data is not being used as this will make the final small sites trend data more up-to-date.

Non-self-contained Housing Developments

Does the GLA intend to disaggregate borough housing targets according to non-self-contained housing capacity? If not, we need clarification on whether higher than expected delivery of non-self-contained housing will be supported by the GLA if it is crucial for a borough to meet its five-year housing requirement, which as you know can be required in order to apply certain planning policies that restrict the supply of housing, e.g. protection of employment land. We also request clarification on whether the GLA considers non-self-contained bedspaces as being the equivalent of conventional housing units for the purposes of monitoring.

Vacant homes

We support the proposed removal of vacant homes as counting towards completions. We suggest that the GLA prepares a London-wide empty property strategy that supports boroughs in returning long-term empty properties back into use.

Brownfield Registers

Please can you provide more guidance as to how the GLA will be responding and supporting boroughs with their requirements to compile brownfield registers. For example, the LDD could be taken to provide the brownfield register on behalf of all London boroughs.

Self-build and Custom Housebuilding

Please can you provide more guidance as to how the GLA will be responding and supporting boroughs with their requirements to provide self-build housing plots.

Should you have any follow up queries on these comments please can you direct them to [REDACTED] [\[REDACTED\]@kingston.gov.uk](mailto:[REDACTED]@kingston.gov.uk)).

Yours sincerely,

[REDACTED]
Lead Officer - Planning Policy

The Royal Borough of Kingston upon Thames

[REDACTED]

From: [REDACTED]@lambeth.gov.uk>
Sent: 19 January 2017 15:33
To: London SHLAA
Cc: [REDACTED]
Subject: Feedback from Lambeth on the draft SHLAA methodology

Dear [REDACTED]

Thanks for giving us the opportunity to comment on the draft SHLAA methodology. We support the overall approach and in particular we support:

- The proposed approach to calculating annual average targets based on five-yearly intervals
- The proposal to remove vacants returned to use from the target and monitoring requirement.

We also have following comments and questions:

- The draft methodology suggests we would have received the small sites data to check before Christmas. Have we missed it or is that yet to come?
- We note that the small sites trend-based calculation will include residential units delivered through prior approvals under permitted development rights. Will any allowance be made in this element of the target for those boroughs that have in place and/or are bringing forward Article 4 directions in parts of their borough to remove permitted development rights for change of use from employment to residential? We in Lambeth have made (and will shortly confirm) an Article 4 direction removing PD rights for B1a to C3 in Brixton Town Centre, a set of sites in Clapham Old Town plus 10 (whole or part) of our Key Industrial and Business Areas (LSIS). Once confirmed, this will come into force on 15 September 2017. Also, the whole of the CAZ is currently exempt and we intend to bring forward another Article 4 direction to cover that area once the exemption expires (as do the other CAZ boroughs).
- We note that scenario testing is proposed on garden land. We have a recently adopted Local Plan 2015 policy that restricts development in gardens. There is no intention to review this policy and it is strongly supported by our members. We would therefore wish to maintain the existing approach to garden land in the SHLAA methodology (i.e. removing 90% of completions on garden land).

We look forward to working with you on the SHLAA over the next few months.

Kind regards

[REDACTED]

[REDACTED]
[REDACTED]
Delivery Lead Planning Strategy and Policy
Planning, Transport and Development
Neighbourhoods and Growth
London Borough of Lambeth
Phoenix House 1st Floor
10 Wandsworth Road
London SW8 2LL

From: [REDACTED]
Sent: 20 January 2017 22:43
To: London SHLAA
Subject: London SHLAA methodology response

Dear [REDACTED]

Thank you for the opportunity to comment on the draft SHLAA methodology.
The following are the comments of the London Forum of Amenity and Civic Societies.
The reference numbers given are those of the document.

Our key points are as follows:-

- The SHLAA should extend to 2044
- The 270,000 homes with permission should be profiled and action planned
- A balance is needed between use of space for homes and for businesses
- Too much industrial land is being lost
- There should be agreements with approvals for delivery phasing
- Land of all utility companies should be considered
- Opportunities should be taken for development land assembly
- Opportunity areas should have site allocations within them
- Densities above the top of the range should be rare exceptions
- The 1km assumption for local walking is too high
- The setting for District Centres is unrealistic
- Existing back-street town centre businesses must be protected
- OAPFs must plan for the space needed for infrastructure and community needs
- More reference and use should be made of the HTA 'Superbia' proposals
- Development of any sites in Green Belt or Metropolitan Open Land must be banned
- Air pollution and noise other than from aircraft must be considered as constraints
- Playground land and sports facilities for schools should be considered as excluded
- Clarification is needed for mega-flats sold to foreign investors left empty as investments
- Clarification is needed on offices converted to dwellings

1 - SHLAA Introduction

The 25 year period for housing capacity should extend to 2044 because the Mayor's replacement London Plan will not be adopted until 2019 according to the slide presentation supporting 'A City for All Londoners'.

1.2 Sources of capacity

London Forum is keen that the source of housing capacity that relates to the existing 270,000 home approvals is examined carefully for each major site. It is necessary to ascertain the reality of some schemes being built and the delivery rate of those that are likely to proceed. It is understood that the GLA has had an analysis performed of approvals on the London Development Database. Publication of the results would be useful and provide better clarity for housing volumes from that category so that local infrastructure planning can proceed. Details of each application and those involved in the schemes resulting from that analysis cannot be published, clearly, but it would be useful to understand what types of homes and in what volume are likely and when from the approvals.

An indication of those that will have permission expiring in coming months and years should be understood by the boroughs and the GLA so that revised or new applications can be determined on the basis of recent policies and guidance published by Sadiq Khan.

Approved developments that are speculative to establish new land values for the owner but have no developer involved need to be examined to see if they are the most suitable developments for their location. Partnerships should be established with the land owner to achieve development where possible.

The SHLAA methodology would yield more meaningful results if such actions are taken.

Consideration should be given to dividing some allocated large sites for development so that sections could be built in parallel by different developers or used for complementary mixed use purposes and infrastructure. This is covered by the third bullet point of paragraph 1.7.

The category of potential sites should include all publically owned land including that of utility companies like National Grid, as in paragraph 3.19.

Small sites will become more important in future as they can give quicker delivery of homes and there needs to be more done to engage small and medium builders in those sites. That is relevant to the content of this SHLAA methodology in section 5 - 'Sources of capacity outside the large site system'.

1.3 Project timescale

The "various scenario tests" need to be explained. The retention of industrial locations and the provision of new workspace have to be considered together with the demand for additional homes, as the methodology indicates.

1.4 Background and context to the study

There is no basis for considering the suggested need for 65,000 homes annually without an analysis of the new SHMAA. If "indicative results" from the SHMAA will be available by March, it is important that they are published for comment on those and its objectively assessed housing need.

The "additional housing intensification in town centres" in the last bullet point of paragraph 1.7 has to be planned carefully against the need for additional business space in such locations to support the local economy and to reduce the need to travel to work. The adverse effect of the Government's permitted development rights for office conversion have to be taken into account.

1.8 Industrial land research

London Forum is critical of the way more industrial land has been lost in London that was intended by policies of the London Plan. Strategic Industrial Land (SIL) loss needs to be seen as a serious issue in assessing identified potential housing land. There may be opportunities to change use of areas within SILs and Locally Significant Industrial Sites (LSISs) but the introduction of homes in such locations is often unsuitable for their new occupants due to the existing industrial activities and can lead to the closure of any businesses that adversely affect the amenities of new residents. There should be a presumption against those impacts and the loss of more industrial land until it can be demonstrated not to be needed. The trend based scenario in paragraph 1.9 should be removed. The Industrial Land Demand Study should be made available to boroughs soon. It should help the SHLAA process but should not be left too late in the capacity analysis process.

The probability assumptions in section 4 of Table 6 for LSIS release seem too high, given the excessive loss of industrial land in recent years and the incomplete state of the Industrial Land Demand Study.

The study of intensification, relocating and grouping of industrial land (para. 10) is welcomed but care must be taken not to separate businesses from their suppliers, customers and collaborators.

The industrial land shown on 3.14 Figure 1 in the Lee Valley and in East London along the Thames should be considered carefully for release due to the opportunity of using the waterways for the transport of materials and goods, thus reducing road traffic.

1.12 Confidentiality

The aim not to publish 'potential' housing sites for the reasons given is understood and supported but there are conflicts with the existence of the London publically owned land web site and maps and the insistence of Government that borough make known small sites for Right to Build and other forms of cooperative housing delivery.

1.14 Call for sites

It is encouraging that the 'call for sites' exercise has provided an indication of deliverability and phasing. It is hoped that such details will be carried into agreements and conditions in approvals granted rather than just let them be added to the 270,000 existing approvals.

2 - Density estimates

London Forum does not support a general rule (paras. 2.2 and 2.8) that densities in opportunity areas should be above the top of the appropriate range. The current London Plan has a Key Performance Indicator that only 5% of developments should be above the range applicable to the sites on which they are built. That limit would have to be increased considerably if all forty opportunity areas are to be developed without constraint on density. There is a likelihood that the result could be a failure to create sustainable neighbourhoods, demands for social infrastructure that could not be met, poor place making and adverse living conditions for new residents.

If carried to the edges of opportunity areas, developments above the density range specified in the London Plan could be overbearing on surrounding communities and harm views. There should be a steeping down of building heights near the edge of opportunity areas, as suggested in paragraph 2.12.

Opportunities should be taken by land assembly to deliver mid rise homes at a suitable density and to avoid unnecessary tower blocks proposed by developers who acquire small areas of land for maximum profit. The planning frameworks for opportunity areas should specify site allocations within them and that should determine the contribution they would make to the SHLAA.

The assumption for density purposes that people are prepared to walk one kilometer to the town centre (also in para. 4.5) is not reasonable. The distance would be measured 'as the crow flies' whereas walking routes would be longer.

The description of housing stock type for suburban locations in the table at the top of page five of 'All other areas' is not meaningful.

The aim to densify town centres is accepted but it does not seem correct to apply an urban or central location to all of them when they include very many district centres in London Plan Table A2.1 where transport is not always of a high frequency or capacity and infrastructure may be slow or difficult to deliver. Some of the district centres have a policy direction of 'low'.

Many areas behind the frontages of high streets accommodate a variety of small businesses. Intensification of town centres (para. 2.7) must not assume that they can be displaced without harm to the availability of services, jobs and opportunities for economic development. That should be identified in Town Centre Health Checks (para. 3.42) and suitable protection and development for business purposes planned before assumptions are made about clearing such areas.

The same considerations should apply to the protection of businesses in railway arches, some of which have been evicted by TfL's development of such facilities. That is a comment for GLA London Plan team consideration rather than being relevant to the SHLAA methodology but the facilities such small businesses in those arches provide in terms of local services and infrastructure are important for making new housing development sustainable.

It is not reasonable to assume that every town centre which is in or near an opportunity area can accommodate the higher density to be allowed for opportunity areas (para. 2.10).

Paragraph 2.13 implies that it is intended that in this SHLAA there should not be large reductions in the initial densities for sites (70% had initial densities reduced in 2013). GLA officers will take into account "trends in approvals". London Forum hopes that will not result in the Mayor over-ruling boroughs on the capacity that a site can deliver because recent trends in approvals have shown too many decisions in favour of developments with housing density three times or more the expected density for their sites. The same concerns apply to the LSE density model update work described in paragraph 2.16 which will also use recently completed developments.

London Forum supports the ability in the SHLAA methodology for boroughs to amend the land use mix of identified sites and reduce the net residential site accordingly (para. 2.14). That should avoid more schools having to be built on Metropolitan Open Land.

According to paragraph 2.15, revised or new Opportunity Area Planning Frameworks are being produced which will raise the densities assumed in the last SHLAA and in the London Plan. It is important that those draft OAPFs are consulted upon to give local communities the opportunity to understand the implications. The OAPFs must plan for the space needed for infrastructure and community needs.

3 - Potential sites

The methodology proposed in this section is supported but there seems to be no consideration of the intensification of land use in developed areas that have been explored in the '[Superbia' proposals](#) produced by HTA two years ago and examined by the last Mayor's Outer London Commission for implementation. They are an implied opportunity mentioned in the third bullet point of para. 4.5 but more guidance to boroughs is required on examining the possibilities.

An additional delivery constraint for sites to which those proposals could apply will be the willingness of existing owners of homes and businesses to cooperate in the intensification of the land they own. That needs further consideration and policy development.

In other cases where areas other than social housing estates could be intensified, the reluctance of elected Councillors to implement unpopular compulsory purchases should be taken into account and the willingness of local communities to support change.

London Forum supports strongly and welcomes the ban on allocating for development any sites in Green Belt, Metropolitan Open Land, Nature and Scientific sites and protected public or private space. However, in the latter case the 'unsuitable' classification should apply to all such sites, not only ones identified on a borough proposals map.

The application of zero development probability on safeguarded wharves is supported but consideration should be given to the retention on canals of materials transfer stations that could be used for transport by water of deconstruction waste and building materials. It may be reasonable to create more such transfer sites, particularly on the Paddington / Old Oak canal which has no locks, for general movement of goods by water. That would reduce the development area of some sites.

Environmental constraints

The omissions as constraints for house building in Table 7 of air pollution and noise other than from aircraft are serious and should be considered by the GLA.

Delivery constraints

The 10% reduction in probability for development in areas of medium category where there is a lack of local infrastructure, as in Table 8, seems to be a crude constraint. It will depend upon what elements of infrastructure are missing and how and when the deficiencies can be dealt with. The same approach should be taken as for developments of public transport near to an identified site where the timescale and capacity are to be taken into account.

Potential options to overcome constraints - Table 9

The timescale for some of the mitigation and avoidance measures may not be as good as in 2013 because cuts in borough resources have become a more significant factor. Also, the items to be funded by development may be affected by CIL-free developments and the requirement of the Mayor for 35% affordable housing in new developments.

SHLAA phasing periods

London Forum questions the assumption in the second bullet point of paragraph 3.30 that all sites with planning permission where development has not started will be completed by 2024. Some will be large sites where housing delivery is likely to be over a ten year period after building commences.

Potential/allocated sites with a 100% probability may also be subject to delays, as acknowledged in paragraph 3.31. It is hoped that the GLA now has a better understanding of what prevents or delays commencement from the analysis it commissioned of the schemes with approvals capable of delivering 270,000 housing units.

Housing Targets

Paragraphs 3.32 and 3.33 do not indicate the process for examining reasons for deviation from the housing delivery expected in the three or five phases to be used for monitoring. It should be explained what will be done if expectations are not met.

Are mega-flats sold to foreign investors to be left empty as investments counted a delivery of homes for Londoners?

How are offices converted to dwellings considered for housing targets?

Most of them do not deliver the types of homes needed in the location.

Low probability sites

The playground land and sports facilities for schools (para. 3.34) should also be considered as excluded from consideration for SHLAA. Too much such land has been lost to non-educational development. London Forum does not support the encouragement in paragraph 3.35 for boroughs to build homes on school sites.

London Forum is not sure that civic buildings should be considered as zero chance of development. LB Housing is vacating its Civic Centre site for it to be developed for housing and building a more compact centre in the town centre. There may be opportunities for that to be done elsewhere, particularly if suburban civic centres have large areas of public open space and car park land, as Hounslow Council's did.

The opportunity for housing in redeveloped out of town retail sites (para. 3.40) will need to be considered against the restraints of inadequate public transport and social infrastructure.

Offices

Paragraph 3.43 states that "offices will be automatically considered as potential sites in the SHLAA system" but London Forum proposes that this is unwise. Office availability fell in Central London near to a critical level of only 3% after the permitted development (PDR) diktats of the last Government for conversion of offices. Office space rentals rose significantly as a result, as RICS has demonstrated. The exclusions for considering office sites as potential for homes are inadequate in para. 3.43. Boroughs are already implementing Article 4 Direction to protect their local economy and work space for voluntary organisations and small and emerging businesses.

The economy of London and its contribution to the nation's GDP are too important for the proposals in this SHLAA methodology for considering office conversions or replacement to be implemented as described.

Estate regeneration schemes

London Forum supports estate renewal but only if the policies of Sadiq Khan are followed for no enforced evictions, homes provided for previous occupants, fair treatment of RTB leaseholders and engagement of the community in the estate in refurbishment plans. The type of any increase in dwellings obtained during estate renewal should be aimed at the unmet housing need of the area and that should impose additional constraints on the extra homes forecast to be provided.

Emerging opportunity areas (OAs)

The additional OAs suggested need evaluation for their PTAL and Infrastructure. For example, the Great West Corridor would need significant transport investment over a considerable timescale to make its potential be able to be realised. Those restraints and the local economic requirements must be clear before they are added to the SHLAA as additional housing opportunities.

For the London Riverside opportunity area and the Old Kent Road AAP (para. 3.14) there should be careful consideration of context and character which could limit density.

4 - Scenario testing

It is stated that the 2017 SHMA "will identify a higher level of housing need than the previous 2013 SHMA study". That is not yet clear although the failure over the last six years to deliver homes for rent that people can afford is relevant. It needs to be recognised that the delivery of market housing for sale has exceeded the targets set. The land identified by this SHLAA must be considered for its ability to deliver the types of homes Londoners need.

There is emphasis in the SHLAA methodology of opportunities for housing development that arise from rail and Underground developments (para. 4.3). No value is given to the unlocking of additional housing provision by improved bus, tram and light rail services. That needs more consideration.

5 - Vacant homes

It is stated in para. 5.8 that "Since 2004 the overall number of long-term vacant homes in London has reduced by half and now accounts for only 0.6% of the total housing stock". They are "a key Mayoral priority". London Forum expects the reasons for vacancies and the opportunities for availability or redevelopment on some such sites to be understood. There is no indication that is so. The exclusion of vacant properties from the SHLAA (para. 5.10) does not seem reasonable. Appendix B shows that there are around 1,000 long term vacant homes in each of nine boroughs and figures over 700 in several others.

The methodology should cover Air B&B properties for short term let which are increasing.

Submission prepared by:-

[REDACTED], London Forum of Amenity and Civic Societies January 2017
[REDACTED]

[REDACTED]

From: [REDACTED]@reigate-banstead.gov.uk>
Sent: 10 January 2017 09:16
To: London SHLAA
Cc: Catherine Rose
Subject: Draft London SHLAA methodology

Dear [REDACTED]

Thank you for the opportunity to comment on the draft London Plan SHLAA Methodology.

Overall, we broadly support the methodology and assessment approach proposed which seems to identify suitable sources for the identification of sites and appropriate constraints to development. We would however like to raise two points with regards to Green Belt and industrial land.

Green Belt

Reigate & Banstead Borough Council acknowledges that Green Belt is a constraint to development. Whilst we appreciate the Mayor's approach to Green Belt; we suggest that – should the SHLAA indicate that London is unable to meet its identified need through existing sites – then a review of Green Belt should be undertaken. This would allow any sites that no longer meet the purposes of Green Belt to be identified and assessed as potential housing sites and would be consistent with the National Planning Policy Framework core principle that through plan-making every effort should be made to meet the development needs of an area.

Industrial Land

Reigate & Banstead Borough Council also appreciate that existing industrial sites may be better suited to other uses, including housing. We are however concerned that with the approach proposed, this could result in a significant quantum of loss of industrial floorspace from within London and subsequent increased demand for additional employment floorspace outside London. This could run contrary to the principles of sustainable development and reducing the need to travel. We appreciate that the Greater London Authority is currently undertaking an Industrial Land Demand Study and would welcome the opportunity to engage in this work as part of the duty to co-operate.

We look forward to further engagement over the coming months as your work to develop the London Plan progresses.

Kind regards,

[REDACTED]
[REDACTED]
Policy Development Officer
Reigate & Banstead Borough Council

[REDACTED]
Follow the council on [Twitter](#) / [Facebook](#) / [LinkedIn](#).

From: [REDACTED]@richmond.gov.uk>
Sent: 19 January 2017 16:44
To: London SHLAA
Subject: Draft London SHLAA methodology
Attachments: Local Green Space designation x.zip; OSNIs new additions only.zip; Publication Local Plan - site allocations.zip

We welcome the forthcoming SHLAA and the opportunity to finely assess future potential housing capacity in the borough with the GLA. There are a few points to set out the context for Richmond and officer views on the proposed methodology, on behalf of the London Borough of Richmond upon Thames.

- The small sites component will be based on annual trends from 2004/5 to 2014/15. Richmond is concerned that this will include a significant proportion of office to residential prior approvals, at a rate which is not sustainable given the influx since 2013 of these conversions in the borough, and which is highly unlikely to continue at this rate given the very limited supply of sites and the important controls to be exercised through Article 4 directions across defined areas of the borough. (It is noted that for large sites, any offices considered as potential sites can be excluded and assigned 'low probability' status.). Therefore, Richmond is seeking the exclusion of prior approval figures from 2013 onwards for the annual trends for the small sites component of the methodology.
- The previous SHLAA methodology removed 90% of housing completions on garden land and it is considered that this SHLAA should continue to maintain only a very limited supply from garden land. However a high proportion of the small sites annual trends will be based on permissions which pre-date current London Plan and local policies which limited back garden infill. The Council's Local Plan Review continues a presumption against back garden development is due to the need to maintain local character, amenity space and biodiversity. It is noted that potential scenario testing will explore potential for delivery and assumptions will be shared with boroughs for comment. Therefore, Richmond is seeking to maintain a similar approach to the previous SHLAA methodology's approach in relation to garden land.
- The Richmond context is that there are limited opportunities on large sites and there often tend to be other priority land uses, including employment and infrastructure needs particularly for education, which mean that development opportunities are not necessarily housing led. It is noted that the land use mix assumed on a site can be amended (to reduce the net residential site area) and the GLA are asked to note that it is likely on a number of large sites in Richmond the proportion for residential will be reduced by infrastructure needs.
- We note the potential for looking at different scenarios for industrial land release and the industrial demand study that will inform the SHLAA. It should be noted that Richmond is a restrictive transfer borough, and has very little industrial floorspace, indeed one of the smallest reservoirs of space in London. The Council's Local Plan Review is seeking a restrictive approach to the loss of employment land, based on robust evidence including the updated [Employment Land Study \(2016\)](#), and it is imperative that Richmond's local employment designations are seen as constraints and not opportunities. The Local Plan identifies industrial sites to be protected, and in those sites even the introduction of mixed use development is unlikely to be policy compliant and could jeopardise policies to protect the local economy. We would like to point out that 2016 Richmond Employment Land Study update suggests a very positive demand for industrial land, in comparison to the previous study in 2013, where the strategic policy encouraged a managed transfer of land out of industrial uses. However, the Employment Land Study update (2016) makes it clear that the benchmark approach has not work, and the figures show that from a 2010 position of low industrial land supply in Richmond, the borough has lost approximately a third of its reservoir in just five years, and now we have just 25 hectares of industrial land remaining. Therefore, this local evidence provides a robust justification for a more stringent local policy interpretation of what 'restrictive transfer' means. Therefore, for the purpose of the SHLAA methodology, Boroughs should be able to justify a lower percentage for the default probability assumption for non designated industrial/employment sites protected by Local Plan policies as, in a borough such as Richmond which has not designated LSIS, those employment areas (with Article 4 directions for office to residential and local designations for industrial/employment sites) are of vital importance to protect and should not be seen as contributing to future housing supply on the basis of 45% probability (when the LSIS is 5% less in restricted transfer boroughs).
- It is noted that density estimates for allocated and potential sites will be estimated at the top of the London Plan density matrix, and that boroughs will be able to adjust density assumptions, normally where boroughs have undertaken a detailed site appraisal or similar to establish an alternative assumption. The ability to vary assumptions is considered essential for Richmond, where there is a need to reflect local considerations, site

context and character, such as the proliferation of Conservation Areas, Listed Buildings, local heritage assets and protected views. There will also be a need to take account other policy constraints, including on building heights; there is a presumption in this borough that higher residential densities would need to be achieved in appropriate locations without recourse to tall or taller buildings.

- The Council welcomes that the SHLAA will scope to provide for longer 15 year minimum targets and explore whether it would be more appropriate for annual monitoring targets to be based on five year phasing periods. It is considered that this will provide a useful basis for Local Plans and monitoring. In Richmond this is considered to be appropriate given completions can fluctuate highly between years, depending on the number and scale of any large sites.

Since the Council provided shapefiles to the GLA, the Local Plan Review has reached the [Publication](#) stage and there are new sites/designations – an additional site allocation at Kneller Hall, Whitton; a Local Green Space designation in Teddington; and an additional five sites of (Other Sites of Nature Importance) OSNI – please see attached as it is suggested these are added into the SHLAA mapping system (*please note the shapefile for the site allocations is all site allocations including Kneller Hall; the others are just the additional/new sites*).

Many thanks,

[Redacted]
Principal Planner (Richmond)

[Redacted]
www.richmond.gov.uk | www.wandsworth.gov.uk

London Borough of Sutton

Environment, Housing and Regeneration Directorate Economic Development, Planning and Sustainability



Direct Line:

E-mail:

Date:



@sutton.gov.uk

20th January 2017

Please reply to:

London Borough of
Sutton
24 Denmark Road
Carshalton
Surrey. SM5 2JG
www.sutton.gov.uk

Dear 

DRAFT LONDON SHLAA METHODOLOGY 2017

Thank you for giving us the opportunity to comment on the Draft London SHLAA Methodology. The council is largely supportive of the approach but does have some concerns which have been set out below.

Character Setting Map

The council does not support the approach to housing density, specifically the updated character setting map that has been proposed. The table presented in the methodology under paragraph 2.3 proposes a central setting of 1km from Metropolitan Centres, 1km from District Centres and suburban for all other areas. This is contrary to the local approach that is set out in the adopted Core Planning Strategy (2009) and the Draft Local Plan, published for consultation in January 2017.

The draft methodology considers that areas with 75% or more flats as having a central character setting up to 1km from Sutton Town Centre. Whilst areas around Sutton town centre (outside the core town centre but within the Sustainable Residential Quality Areas) have been redeveloped with flats, redevelopment has usually been restricted to 3 or possible 4 storeys in height and the suburban tree-lined character of the existing streets has been retained. Developments at central setting densities within in these areas would be extremely harmful to this character. Therefore, the character map needs to be amended by indicating a tighter boundary to Sutton town centre based on the existing town centre boundary shown on the adopted Proposals Map and indicating the enclosed area as 'central' in character. The remaining areas, up to 800 metres from the town centre (as set out on the adopted Proposals Map) should be reclassified as 'urban'. The council considers this to be a far more realistic approach that reflects the local character.

Similarly the application of an urban setting up to 1km from the District Centres would be totally inappropriate in the Sutton context. In the Core Strategy the Urban setting is only applied up to 400 metres from each district centre. Beyond 400 metres District Centres are predominately 2-storey semi-detached residential dwellings which offer very good examples of suburban London, with densities

typical below 30 dwellings per hectare. Applying the Urban setting beyond 400 metres would cause irretrievable harm to the suburban character of these areas.

Locally Significant Industrial Sites

The council is concerned about the default probability assumptions set out in Table 6 in relation to Ref 4 'Locally Significantly Industrial Sites (LSIS) designated in a Local Plan'. Sutton is located in a restricted transfer borough and, as such, LSIS (known as Established Industrial Locations in Sutton and set out on the adopted Proposals Map) would be attributed a 40% probability. Sutton's up-to-date evidence base on industrial land is clear that Sutton should not lose any significant amounts of industrial land in the future above what has already been planned for/permitted and the council should take a strong line in resisting pressure on such land. Any applications the council receives for residential development in these areas will be resisted in the strongest possible terms. As such the council considers that LSIS in Sutton should have a 0% probability assumption and would welcome the opportunity to alter this in light of this local evidence.

Vacant Homes

The council supports the proposed approach to vacant homes and agrees that this issue should not be considered in the next SHLAA or in terms of the monitoring of forthcoming targets in the next London Plan.

Summary

In summary the council's principal concern is that the character setting map does not reflect local circumstances and consequently its application as proposed is likely to lead to densities that would significant change and cause harm to the local character and the suburban nature of large areas of Sutton.

Yours Sincerely,


Senior Planning Policy Officer
London Borough of Sutton

Chief Executive –
Niall Bolger

Strategic Director –
Mary Morrissey

Draft SHLAA Methodology

This paper outlines the proposed methodology for the next SHLAA. Boroughs and other stakeholders should provide feedback and comments on the draft methodology by 20th January. Consultation responses should be sent:

By email to - LondonSHLAA@london.gov.uk
By post to - [REDACTED]
Greater London Authority
City Hall
The Queen's Walk, London SE1 2AA

1 Introduction

1.1 In line with national planning policy and guidance, the next London Plan will need to be informed by a Strategic Housing Land Availability Assessment (SHLAA). The purpose of the SHLAA is to identify the amount of housing capacity in London that is suitable, available and achievable during the plan period in order to address housing need. The study will cover a 25 year period from 2016 to 2041 and will inform the housing targets in the London Plan. This will be supported by a separate viability assessment. The draft methodology is structured as follows:

- Section 1 provides an introduction and sets out the context to the SHLAA study
- Section 2 summarises the density estimates proposed for the SHLAA
- Section 3 explains the probability based approach applied to 'potential' large sites and explains how planning policy, environmental and delivery constraints will be applied in the study
- Section 4 sets out the range of potential scenarios that will be tested in the study
- Section 5 sets out the approach to small sites and long term vacant homes

Sources of capacity

1.2 The study will draw on the following sources of capacity:

- **Approvals** – net housing provision from London's pipeline of large sites with planning permission (0.25ha or larger), identified in the London Development Database (LDD). This takes into account any housing completions undertaken on sites where development has already commenced. It will also include non-self contained housing (eg accommodation for students and specialist housing for older people).
- **Allocations** – large sites which are allocated or informally identified for housing/mixed use redevelopment (0.25ha or larger) – these sites have been provided to the GLA by boroughs.
- **Potential sites** – other potential large sites (0.25ha or larger) which are currently in the SHLAA system or have been identified through the call for sites or through GLA/TfL development capacity studies in opportunity areas and associated with transport schemes. In addition, boroughs will be able to add new large sites and edit site polygons drawing on their local knowledge.

Commented [SL1]: To be consistent with website – over 0.25 hectares in size

- **Small sites** – annual trends in conventional housing completions on small sites under 0.25ha in size (2004/5 – 2014/15), taking into account potential for these trends to be increased through changes to planning policy and scenario testing.

Project timescales for the SHLAA

- 1.3 To inform the draft London Plan the SHLAA needs to be completed by summer 2017, with initial results finalised by ~~the~~ June. In order to meet this deadline it is necessary to:
- carry out site assessment and borough one to one meetings between February and May
 - undertake various scenario tests alongside the site assessment process
 - finalise and write up the SHLAA document by the end of August 2017

Commented [SL2]: Define

Background and context to the study

- 1.4 The next housing need assessment (SHMA) is likely to show a higher overall housing requirement due to faster household population growth and worsening housing affordability. Initial GLA estimates suggest this could result in an annual housing requirement of between 55,000 and 65,000 homes, with affordable housing need likely to comprise more than half of this figure. Indicative results from the SHMA are likely by March to inform the Full Review of the London Plan. The final SHMA and SHLAA studies will be published alongside the Draft London Plan in Autumn 2017.
- 1.5 The NPPF requires that plans meet the full, objectively assessed need for market and affordable housing as far as consistent with the policies set out in the Framework¹. The SHLAA plays an important role in understanding the extent to which London has the land capacity to meet its objectively assessed housing need, taking into account the range of economic, environmental and social policy objectives and an understanding of potential deliverability constraints.
- 1.6 The proposed methodology for the new **SHMA-SHLAA** broadly follows the same approach as the previous SHLAA which was found sound during the Further Alterations to the London Plan Examination in Public (EiP) and at previous London Plan EiPs. Further refinements are suggested to the SHLAA methodology in this paper. These aim to ensure potential housing capacity is not being under-estimated, while understanding the competing land use priorities and without undermining the overall robustness of the SHLAA. This follows a detailed review of the previous SHLAA methodology in light of national guidance and the site assessment process.
- 1.7 The SHLAA system has been designed to ensure there is sufficient flexibility to enable different policy options to be modelled and tested to inform the Full Review of the London Plan, taking into account various policy scenarios. This includes:
- different scenarios in terms of industrial land release (see below)
 - the impact of key transport infrastructure schemes on housing capacity, land uses and potential densities, including Crossrail 2, the Bakerloo line extension and other potential transport schemes and potential station intensification areas (see pages 22-23)
 - the potential for existing trends in housing completions on small sites to increase by enabling additional housing intensification on available small/infill sites and within the existing housing stock, for example through suburban intensification, through

¹ NPPF paragraph 47

Table 5 – constraint categories

Planning policy constraints	<ul style="list-style-type: none"> • Designated open space • Strategic Industrial Land (SIL) • Locally Significant Industrial Locations (LSILs) • Non designated industrial sites which boroughs wished to retain • Safeguarded Wharves
Environmental Constraints	<ul style="list-style-type: none"> • Flood Risk • Aircraft noise pollution • Health and Safety Executive consultation zones • Pylons
Delivery constraints	<ul style="list-style-type: none"> • Land ownership • Local Infrastructure • Contamination

Commented [SL3]: Consider MOL?

Probability based approach

3.3 The same “constraints model” approach as in previous SHLAA studies will be used to provide an estimate of housing capacity on potential sites. This constraints model works in the following way:

- sites are assigned a notional density, based on the residential site area and a density estimate
- where a site is expected to be mixed use, boroughs can adjust the land use assumptions for each site, which amends the net residential site area
- the system then assigns a probability estimate of a site coming forwards for development based on the number and severity of policy, environmental and delivery constraints affecting it. These constraints are set out in Table 5 and are identified using GIS data and local knowledge through the site assessment process.
- the lowest percentage probability score across the three constraint categories – planning policy, environmental and delivery constraints – is applied to the notional density in order to provide a ‘constrained housing capacity estimate’ for the site in question. The probability score also impacts the assumed phasing period for a site.
- For example, if a site has a notional capacity of 100 units and an 80% probability of coming forward for development, the constrained housing capacity is assumed to be 80 units.



[REDACTED]

From: [REDACTED]@walthamforest.gov.uk>
Sent: 17 January 2017 16:32
To: London SHLAA
Cc: [REDACTED]
Subject: RE: Draft Methodology - London Strategic Housing Land Availability Assessment

Hi, [REDACTED]

Based on the information so far we have, we think the SHLAA methodology will meet the purpose. Regarding room for improvement, you may wish to consider the following:

- We wonder whether the new system will have a field for us to add notes for special cases.
- For sites like Buckingham Palace (as an example), you may wish to add the method to 'User Guide' how to exclude them. Last around, I had to work it out myself.
- New developments generate population. We wonder whether the system can be linked up with the [GLA population yield models](#) to assess number of population to be generated by each site. Currently, we have to do this by adding the data to the relevant models. The population information is important for identifying infrastructure provision to deliver new developments.
- We wonder whether brownfield 'Land Types' will be included in the system. This will be useful for the emerging Brownfield Register.
- After the completion of the assessment, we hope the new SHLAA system will allow us to update the data on regular basis as standard task like the LDD. If yes, we would like to know your project plan for us to plan ahead.

Please feel free to contact me, if you wish to discuss the above.

Regards

[REDACTED]
[REDACTED]
Information and Monitoring Officer
Planning Policy Team
London Borough of Waltham Forest

Twitter: [@wfcouncil](#)

Website: www.walthamforest.gov.uk

Our ambition is that everybody in Waltham Forest enjoys a quality life.

Wandsworth Council Consultation Response to GLA Draft SHLAA Methodology

Please note these are Officer level comments.

1. Targets

The proposal to average annual monitoring targets based on 5 year trajectory phases in the SHLAA is welcomed to ensure that boroughs with delivery weighted towards the end of the plan period can continue to demonstrate a 5 year supply of housing throughout the plan period.

2. Small sites

Long term average trends in small site completions are supported, providing the figures do not include Prior Approvals as the Council is in the process of introducing an Article 4 direction to limit B1a to C3 permitted development rights in the borough as detailed in paragraph 5. It is requested that boroughs are given ample time to review and comment on the detailed methodology in relation to scenario testing / small site intensification that will follow. It is noted that small sites data was due to be shared with boroughs for checking before Christmas, it would be useful to have an updated timetable for this work.

Wandsworth's Local Plan identifies that development of back gardens in the borough is generally an inappropriate form of development; further guidance on garden land is set out in the Council's Housing SPD. It will therefore be important that this approach is reflected in the SHLAA methodology and that the same approach is taken to removal of 90% of housing completions on garden land in this analysis as in the previous study.

3. Policy scenarios

Crossrail 2 It is anticipated that growth will be deliverable around Crossrail 2 stations which are intended to be located within the borough. Planned construction timetables are currently 2023 to 2033 and careful consideration needs to be given to the phasing of sites which are potentially linked to Crossrail 2 development as large capacities generated could lead to the borough having a target which cannot be met if the construction timetable is delayed. A target which includes assumed delivery of Crossrail sites could potentially translate into the Council not being able to demonstrate a 5 year supply, leaving the Council in a vulnerable position at appeals. It will be necessary to factor in this risk when determining phasing and probability assumptions for these sites. The opportunity to amend phasing assumptions based on local knowledge is welcomed.

Locally Significant Industrial Area Sites LSIAs fulfil an essential function in the borough's local economy, with low vacancy rates indicating continuing demand for sites and premises within these areas. The policy approach for these sites has very recently been reviewed as part of the Employment and Industry Local Plan review, and some sites that are inefficiently used are proposed for re-designation for a mix of uses including residential use alongside intensified economic uses. This has been informed by an Employment Land and Premises Study, commissioned from AECOM and completed in July 2016, which showed on-going demand for industrial floorspace and that 90% of the borough's benchmark for loss of industrial land set in the Land for Industry and Transport SPG had already been released. The retained LSIAs are therefore vital to provide a reservoir of land and buildings for business, logistics, industry, warehousing and waste management facilities and are

important for providing suitable, alternative local accommodation for businesses displaced from the Nine Elms Opportunity Area. The Council's Local Plan policies (including the proposed submission version of the Employment and Industry Local Plan document, which is due for consultation in March 2017) continue to promote proposals for light industry, general industry, storage and distribution developments in LSIA's and resist proposals for non-industrial uses and it is considered that sites within these areas should be regarded as having a significant constraint and should not be considered as suitable for contributing to future housing supply, or have the option of over-riding default settings to assign a probability of significantly less than 40% in cases where up to date local evidence supports their continued protection.

4. Density Matrix

Character settings It is noted that a new character map (suburban, urban, central) has been developed to feed into density calculations in the SHLAA. Whilst it is welcome that updated data has been used, there remains a quirk in Wandsworth whereby Roehampton ward is characterised as central. This is because there are several tall buildings (local authority housing estates) in the centre of Roehampton which skew the data for this area. The majority of Roehampton is leafy, open and characterised by low rise buildings and development at densities compatible with a 'central' setting would not be appropriate. It is therefore important that boroughs can override this setting for particular development sites when conducting site analysis for the SHLAA.

Densities It is acknowledged that revised densities are proposed to reflect densities achieved in recent years, with particular reference to Opportunity Areas and Town Centres. It is noted that boroughs will be able to adjust site density where necessary and this is welcome. However, it is unclear what the detailed site appraisal requirement entails. A realistic assessment of density can be made using information such as densities achieved on neighbouring sites or detail emerging through pre-application discussions between Case Officers and developers. Where the assessing Officer has such knowledge, it should be acceptable to manually adjust the density settings for such sites.

5. Article 4 Direction

In October 2016, the Council approved the preparation of and consultation on a proposed Article 4 Direction to remove permitted development rights applicable to certain existing office developments in key locations across the borough, including some SILs, LSIA's and the Nine Elms Opportunity Area as the CAZ exemption is limited to May 2019. On current timetables, it is expected the Article 4 Direction will be in place by Spring 2018 and therefore this constraint layer needs to be uploaded to the SHLAA system as for other boroughs. GIS files can be provided.

6. Confidentiality

The Council welcomes the GLA commitment to confidentiality of data for potential sites within the SHLAA system and the borough determination of whether sites should be identified.

Christine Cook

Information and Business Support Team Manager

19/01/2017



**WATFORD
BOROUGH
COUNCIL**

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Mr [REDACTED]
London SHLAA
Greater London Authority
City Hall,
The Queen's Walk
London SE1 2AA

Dear [REDACTED]

RE GLA Draft Strategic Housing Land Availability Assessment

Thank you for providing the opportunity for Watford Borough Council to make representations on the Greater London Authority's draft SHLAA methodology. Watford is the only Borough outside London which is contained wholly within the M25. Consequently our relationship with London is strong with many Watford residents working in London.

In 2016 the South West Herts Authorities published a new Strategic Housing Market Assessment which under the Duty to cooperate included engagement with the GLA and neighbouring London Authorities. Watford has also been working closely with TfL on the extension of the Metropolitan Line to Watford Junction and been participating in the demographic and employment land studies with GLA officers and design work with Urban Design London.

Consultation response from Watford Borough Council

Below is a table setting out the concerns of Watford Borough Council. (NB. National Planning Practice Guidance on Housing and Economic Land Availability Assessments is referred to as NPPG)

Draft SHLAA Methodology	Watford Borough Council response	Suggested change to the draft methodology
The next London Plan will need to be informed by a Strategic Housing land Availability assessment (SHLAA)	Consistent with NPPG, the next London Plan will need to be informed by a Housing <u>and</u> Economic land Availability Assessment. Reference is made at paragraph 1.8 to an already completed Industrial Supply Study and an Industrial Land Demand Study which is underway. It is not clear from the draft methodology if this extends to other employment uses such as offices and other town centre uses.	Consistent with the NPPG, consider reporting on a combined Housing and Employment Land Availability Assessment (HELAA) as part of the same exercise in order that sites may be allocated for the use which is most appropriate. Clarify in the SHLAA methodology if only Industrial land is to be reviewed or whether this extends to other employment uses such as offices or retailing.



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Draft SHLAA Methodology	Watford Borough Council response	Suggested change to the draft methodology
Para 1.1: The study will cover a 25 year period from 2016 to 2041	Support.	No change.
Para. 1.2: Approvals include non-self-contained housing e.g. student accommodation and specialist housing for older people	Is the intention to make an allowance for approvals based on a ratio to convert non self-contained housing to housing numbers? If so, what ratio will be applied and on what basis?	Clarify what ratio is to be applied to convert non-self-contained accommodation to dwelling numbers. If this is not what is intended, clarify what is the intention.
Para 1.11	Industrial land release has been a key issue for the GLA. There have been discussions regarding out of London districts taking some of London's industry to free up more land for housing. How would this be factored in to any SHLAA?	Clarify whether industrial activities will be pushed out beyond Greater London, if so how much land would such a policy free up.
Para 1.12: Confidentiality of potential sites	The SHLAA should identify whether sites are suitable, available and achievable and should include an outline plan of each site.	NPPG sets out the Core Outputs which includes a list of sites cross referenced to locations on maps. The assessment should be made publicly available.
Para. 3.1 – the approach is tailored to London's pressurised market where 98% of housing is delivered on brownfield sites and other sites in active use	Stage 1 of the methodology set out in NPPG does not restrain land availability assessments to land that is already previously developed. All available types of sites should be considered. Sites which have particular policy constraints should be included in the assessment for comprehensiveness. The appropriateness of any constraints should be tested and assessed against national policies and designations to establish which have a reasonable potential for development.	The assessment should not be restrained by previous tailored approaches. All sites should be considered. This does not mean that all suitable, available and achievable sites will ultimately be allocated for development. The task is to select the most sustainable sites in light of the need to meet FOAN unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the NPPF as a whole.
Para. 3.7 – sites classified as unsuitable and deemed to have a	Watford objects to the assumption that the Green Belt and Metropolitan Open Land should be deemed to have zero	The methodology should acknowledge that rather than simply accepting previously defined

Draft SHLAA Methodology	Watford Borough Council response	Suggested change to the draft methodology
<p>zero per cent probability for development. The list includes Green Belt and Metropolitan Open Land.</p>	<p>development probability.</p> <p>To do so would be pre-empting decisions that will need to be made in taking forward the London Plan.</p> <p>NPPG advises that land availability assessments should identify <u>all</u> sites and broad locations <u>regardless</u> of the amount of development needed.</p> <p>Further, <i>“Sites, which have particular policy constraints, should be included in the assessment for the sake of comprehensiveness ... An important part of the desktop review, however, is to test again the appropriateness of other previously defined constraints...”</i></p> <p>NPPG contains a list of sites that may be relevant to the assessment; this includes agricultural buildings, sites in rural locations, sites in and adjoining villages, potential urban extensions and new free standing settlements.</p> <p>Sites in the Green belt or Metropolitan Open Land are not excluded from the assessment potential.</p> <p>Stage 2 of the NPPG methodology advises that plan makers will need to consider the appropriateness of identified constraints and whether such constraints could be overcome.</p> <p>Stage 5 of the NPPG methodology reflects the NPPF. Once established, Green Belt and Metropolitan Open Land boundaries should only be altered in exceptional circumstances through the preparation or review of the Local Plan.</p> <p>London has not yet established one way or another whether or not exceptional circumstances exists to alter Green Belt or</p>	<p>constraints, they should be tested.</p> <p>The Green Belt is not a landscape or wildlife designation, such as an AONB or an SSSI, it is a policy constraint that was previously defined.</p> <p>Local Planning Authorities around London are faced with the challenge of meeting housing needs and Green Belt boundaries are being reviewed due to insufficient supply from urban and other sources.</p> <p>It is simply not acceptable for the GLA to have a blanket ‘zero’ approach to Green Belt sites.</p> <p>The challenge is to find the most sustainable sites and by discounting immediately Green Belt sites means that the GLA SHLAA will not be a comprehensive assessment of land availability.</p> <p>It is important to remember that just because a site is found suitable, available and achievable in a SHLAA does not mean it will be allocated for development in a development plan but to exclude all such sites will mean that the London plan will not be based on a proportionate evidence base and may run the risk of not being found sound.</p>

Draft SHLAA Methodology	Watford Borough Council response	Suggested change to the draft methodology
	Metropolitan Open Land boundaries.	
Paras. 3.11 and 3.12 – probability assumptions for Industrial Land may need to be revisited	Agree – the assumptions should be revisited following the Industrial Land Demand Study.	Add a caveat that London boroughs would only be able to alter the probability assumptions that would result in locally designated employment sites being released for housing where they have an up to date Economy Study and Employment Land Review which indicates that there will be sufficient land to meet the long term employment needs of the borough and that no significant shortfall in employment land would arise as a result of the release, either individually or cumulatively.
Table 8 – Land ownership constraints	<p>The maximum reduction in probability is set at 20% - suggest that in certain cases, the probability reduction could be much higher.</p> <p>Land Registry data is a starting point only. Where land is in multiple ownership, has existing high value uses or if Land Registry data indicate constraints that may not be possible to overcome, then a higher reduction may need to be applied. Not to do so could be over-estimating the deliverability of certain complex sites.</p>	<p>Site promoters should be required to identify and clarify any complex land owner matters so that the GLA can demonstrate that there is a reasonable prospect that sites could be delivered.</p> <p>Allow for a higher impact on probability where complex land ownership issues arise and where a doubt remains that such matters could be overcome by 2041. A starting point for this could be delivery of complex sites since the first London Plan.</p>
Para. 3.25 – 400 sites classified as unsuitable due to ownership	Land ownership is not a suitability assessment, it is an availability and achievability assessment. A site could be suitable (free from physical and environmental constraints) but may not be available if not all landowners are willing or deliverability achievable if legal constraints affect a site.	<p>Clarify that land ownership relates to availability and achievability, not suitability.</p> <p>If the concerns of the GLA is that too many sites were dismissed because of land ownership issues, then this supports the need to work with site promoters to assess if there is a</p>

Draft SHLAA Methodology	Watford Borough Council response	Suggested change to the draft methodology
		reasonable prospect that constraints could be overcome.
<p>Para. 3.28 – boroughs will consider if policy constraints can be overcome</p>	<p>Green Belt and MOL should be added to the list in Table 9.</p> <p>In exceptional circumstances, Green Belt boundaries can be altered.</p> <p>Whether or not the GLA considers that exceptional circumstances exist, a Green Belt or Metropolitan Open Land site could be suitable.</p> <p>Such a site would however only be allocated if exceptional circumstances were to exist, if a site was considered the most sustainable option against all reasonable alternatives and then removed from the Green Belt/ MOL designation.</p>	<p>Add Green Belt and MOL sites to the list in Table 9.</p> <p>They are constrained by policies that could be reviewed should exceptional circumstance exist to do so (a separate decision).</p>
<p>Para. 3.34 – Listed buildings or scheduled monuments / primary and secondary schools excluded</p>	<p>Refer to para. 132 and 133 of the NPPF. If development would result in substantial harm to or total loss of significance of a designated heritage asset (or its setting), consent should be refused unless the substantial harm or loss is necessary to achieve substantial public benefits that outweigh the harm or loss.</p> <p>It therefore follows that if such a circumstance exists, a site should not be considered suitable in the SHLAA</p> <p>Schools are automatically excluded in paragraph 3.34 but then allowed for in limited circumstances in paragraph 3.35 where a programme is in place. The SHLAA may need to consider with the relevant education authority whether between 2016 and 2041 further school sites, e.g. those that are no longer fit for purpose because either the buildings have reached the end of their practical life or the site is</p>	<p>The first test in the 5th bullet point should relate to substantial harm or loss of significance of a heritage asset.</p> <p>Even ‘sympathetic’ enabling development could result in substantial harm to the setting of a heritage asset.</p> <p>Consider the potential for housing on school sites in liaison with the relevant education authority.</p>

Draft SHLAA Methodology	Watford Borough Council response	Suggested change to the draft methodology
	not suitable to accommodate expansion needs are likely to come forward for redevelopment, which may include some opportunities for housing.	
Para 3.45 – boroughs may consider office sites as suitable if they are likely to come forward during the plan period.	The suitability of office sites for housing should be assessed in light of a proportionate evidence base on the forecasts needs of the economy.	Add a caveat that a London borough would only be able to alter the probability assumptions that would result in office sites being released for housing where they have an up to date Economy Study and Employment Land Review which indicates that there will be sufficient land to meet the long term employment needs of the borough and that no significant shortfall in employment land would arise as a result of the release, either individually or cumulatively.
Para 3.46 – Estate Regeneration Schemes	Watford would support the approach to estate regeneration with regard to treatment of demolitions and delivery.	No change proposed.

If you want any further clarification please contact [REDACTED] [@watford.gov.uk](mailto:[REDACTED]@watford.gov.uk) or call [REDACTED]

Yours sincerely,

[REDACTED]

p

Councillor Iain Sharpe
Portfolio Holder for Regeneration and Development

Introduction

The Greater London Authority has issued a draft SHLAA methodology. Consultation responses from stakeholders should be submitted by 20 January 2017. Welwyn Hatfield Borough Council supports the representation made by Hertfordshire Infrastructure and Planning Partnership.

Welwyn Hatfield's housing market relationship with London

Welwyn Hatfield shares a cross boundary housing market relationship with two north London boroughs and in line with the duty to cooperate, has liaised with officers from the London Boroughs of Barnet and Enfield in undertaking its Strategic Housing Market assessment:

<http://www.welhat.gov.uk/CHttpHandler.ashx?id=9428&p=0>

Welwyn Hatfield is therefore a key stakeholder and has a number of comments that it wishes the GLA to take in to account with regards to the proposed SHLAA methodology.

Consultation response from Welwyn Hatfield Borough Council

Below is a table setting out the concerns of Welwyn Hatfield Borough Council. (For succinctness, National Planning Practice Guidance on Housing and Economic Land Availability Assessments is referred to as NPPG)

Draft SHLAA Methodology	Welwyn Hatfield BC response	Suggested change to the draft methodology
The next London Plan will need to be informed by a Strategic Housing land Availability assessment (SHLAA)	Consistent with NPPG, the next London Plan will need to be informed by a Housing <u>and</u> Economic land Availability Assessment. Reference is made at paragraph 1.8 to an already completed Industrial Supply Study and an Industrial Land Demand Study which is underway. It is not clear from the draft methodology if this extends to other employment uses such as offices	Consistent with the NPPG, consider reporting on a combined Housing and Employment Land Availability Assessment (HELAA) as part of the same exercise in order that sites may be allocated for the use which is most appropriate. Clarify in the SHLAA methodology if only Industrial land is to be reviewed or whether this extends to other employment uses such as offices.
Para 1.1: The study will cover a 25 year period from 2016 to 2041	Support this approach	No change
Para. 1.2: Approvals include non-self-contained housing e.g. student accommodation and specialist housing for older people	Is the intention to make an allowance for approvals based on a ratio to convert non self-contained housing to housing numbers? If so, what ratio will be applied and on what basis?	Clarify what ratio is to be applied to convert non-self-contained accommodation to dwelling numbers. If this is not what is intended, clarify what is the intention.
Para 1.12: Confidentiality of potential sites	The SHLAA should identify whether sites are suitable, available and achievable and should include an outline plan of each site.	NPPG sets out the Core Outputs which includes a list of sites cross referenced to locations on maps. The assessment should be made publicly available.

Welwyn Hatfield Borough Council
Response to the GLA consultation on the Draft SHLAA Methodology

Draft SHLAA Methodology	Welwyn Hatfield BC response	Suggested change to the draft methodology
<p>Para. 3.1 – the approach is tailored to London’s pressurised market where 98% of housing is delivered on brownfield sites and other sites in active use</p>	<p>Stage 1 of the methodology set out in NPPG does not restrain land availability assessments to land that is already previously developed. All available types of sites should be considered. Sites which have particular policy constraints should be included in the assessment for comprehensiveness. The appropriateness of any constraints should be tested and assessed against national policies and designations to establish which have a reasonable potential for development.</p>	<p>The assessment should not be restrained by previous tailored approaches. All sites should be considered. This does not mean that all suitable, available and achievable sites will ultimately be allocated for development. The task is to select the most sustainable sites in light of the need to meet FOAN unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the NPPF as a whole.</p>
<p>Para. 3.7 – sites classified as unsuitable and deemed to have a zero per cent probability for development. The list includes Green Belt and Metropolitan Open Land.</p>	<p>Welwyn Hatfield strongly objects to the assumption that the Green Belt should be deemed to have zero development probability. To do so would be pre-empting decisions that will need to be made in taking forward the London Plan.</p> <p>NPPG advises that land availability assessments should identify <u>all</u> sites and broad locations <u>regardless</u> of the amount of development needed.</p> <p>Further, “<i>Sites, which have particular policy constraints, should be included in the assessment for the sake of comprehensiveness ... An important part of the desktop review, however, is to test again the appropriateness of other previously defined constraints...</i>”</p> <p>NPPG contains a long list of sites that may be relevant to the assessment, this includes agricultural buildings, sites in rural locations, sites in and adjoining villages, potential urban extensions and new free standing settlements.</p> <p>Sites in the Green belt are not excluded from the assessment potential.</p> <p>Stage 2 of the NPPG methodology advises that plan makers will need to consider the appropriateness of identified constraints and whether such constraints could be overcome.</p> <p>Stage 5 of the NPPG methodology reflects the NPPF. Once established, Green Belt boundaries should only be altered in exceptional circumstances through the preparation or review of the Local Plan.</p> <p>London has not yet established one way or another whether or not exceptional circumstances exists to alter Green Belt boundaries</p>	<p>The methodology should acknowledge that rather than simply accepting previously defined constraints, they should be tested.</p> <p>The Green Belt is not a landscape or wildlife designation, such as an AONB or an SSSI, it is a policy constraint that was previously defined.</p> <p>Local Planning Authorities around London are faced with the challenge of meeting housing needs and Green Belt boundaries are being reviewed due to insufficient supply from urban and other sources.</p> <p>It is simply not acceptable for the GLA to have a blanket ‘zero’ approach to Green Belt sites.</p> <p>The challenge is to find the most sustainable sites and by discounting immediately Green Belt sites means that the GLA SHLAA will not be a comprehensive assessment of land availability.</p> <p>It is important to remember that just because a site is found suitable, available and achievable in a SHLAA does not mean it will be allocated for development in a development plan but to exclude all such sites will mean that the London plan will not be based on a proportionate evidence base and may run the risk of not being found sound.</p>

Welwyn Hatfield Borough Council
Response to the GLA consultation on the Draft SHLAA Methodology

Draft SHLAA Methodology	Welwyn Hatfield BC response	Suggested change to the draft methodology
Paras. 3.11 and 3.12 – probability assumptions for Industrial Land may need to be revisited	Agree – the assumptions should be revisited following the Industrial Land Demand Study.	Add a caveat that a London borough would only be able to alter the probability assumptions that would result in locally designated employment sites being released for housing where they have an up to date Economy Study and Employment Land Review which indicates that there will be sufficient land to meet the long term employment needs of the borough and that no significant shortfall in employment land would arise as a result of the release, either individually or cumulatively.
Table 8 – Land ownership constraints	The maximum reduction in probability is set at 20% - suggest that in certain cases, the probability reduction could be much higher. Land Registry data is a starting point only. Should land be in multiple ownership or if Land Registry data indicate constraints that may not be possible to overcome, then a higher reduction may need to be applied. Not to do so could be over-estimating the deliverability of certain complex sites.	Site promoters should be required to identify and clarify any complex land owner matters so that the GLA can demonstrate that there is a reasonable prospect that sites could be delivered. Allow for a higher impact on probability where complex land ownership issues arise and where a doubt remains that such matters could be overcome by 2041.
Para. 3.25 – 400 sites classified as unsuitable due to ownership	Land ownership is not a suitability assessment, it is an availability and achievability assessment. A site could be suitable (free from physical and environmental constraints) but may not be available if not all landowners are willing or deliverability achievable if legal constraints affect a site.	Clarify that land ownership relates to availability and achievability, not suitability. If the concerns of the GLA is that too many sites were dismissed because of land ownership issues, then tis supports the need to work with site promoters to assess if there is a reasonable prospect that constraints could be overcome.
Para. 3.28 – boroughs will consider if policy constraints can be overcome	Green Belt should be added to the list in Table 9. In exceptional circumstances, Green Belt boundaries can be altered. Whether or not the GLA considers that exceptional circumstances exist, a Green Belt site could be suitable. Such a site would however only be allocated if exceptional circumstances were to exist, if a site was considered the most sustainable option against all reasonable alternatives and then removed from the Green Belt.	Add Green Belt sites to the list in Table 9. They are constrained by a policy that could be reviewed should exceptional circumstance exist to do so (a separate decision).

Welwyn Hatfield Borough Council
Response to the GLA consultation on the Draft SHLAA Methodology

Draft SHLAA Methodology	Welwyn Hatfield BC response	Suggested change to the draft methodology
<p>Para. 3.34 – Listed buildings or scheduled monuments / primary and secondary schools excluded</p>	<p>Refer to para. 132 and 133 of the NPPF. If development would result in substantial harm to or total loss of significance of a designated heritage asset (or its setting), consent should be refused unless the substantial harm or loss is necessary to achieve substantial public benefits that outweigh the harm or loss.</p> <p>It therefore follows that if such a circumstance exists, a site should not be considered suitable in the SHLAA</p> <p>Schools are automatically excluded in paragraph 3.34 but then allowed for in limited circumstances in paragraph 3.35 where a programme is in place. The SHLAA may need to consider with the relevant education authority whether between 2016 and 2041 further school sites, e.g. those that are no longer fit for purpose because either the buildings have reached the end of their practical life or the site is not big enough to accommodate expansion needs are likely to come forward for redevelopment, which may include some opportunities for housing</p>	<p>The first test in the 5th bullet point should relate to substantial harm or loss of significance of a heritage asset.</p> <p>Even 'sympathetic' enabling development could result in substantial harm to the setting of a heritage asset.</p> <p>Consider the potential for housing on school sites in liaison with the relevant education authority.</p>
<p>Para 3.45 – boroughs may consider office sites as suitable if they are likely to come forward during the plan period.</p>	<p>The suitability of office sites for housing should be assessed in light of a proportionate evidence base on the forecasts needs of the economy.</p>	<p>Add a caveat that a London borough would only be able to alter the probability assumptions that would result in office sites being released for housing where they have an up to date Economy Study and Employment Land Review which indicates that there will be sufficient land to meet the long term employment needs of the borough and that no significant shortfall in employment land would arise as a result of the release, either individually or cumulatively.</p>

[REDACTED]

From: [REDACTED]@westminster.gov.uk>
Sent: 05 January 2017 10:43
To: London SHLAA
Subject: Response to draft SHLAA Methodology consultation
Attachments: Examples of multiple blocks in seperate ownership 2013 SHLAA.PNG

Thank you for giving officers at Westminster the opportunity to comment on the draft SHLAA methodology, about which we have a number of concerns.

Firstly, we are very concerned about the change to assessing delivery constraints in the SHLAA methodology (paragraphs 3.21 – 3.24) with regards to land ownership. The methodology states that Boroughs will not be able to set the constraint level to 'unsuitable' (0% probability) for any delivery constraints as they are all considered to be capable of being addressed during the course of the SHLAA period. There is no justification in the methodology for why classifying sites as unsuitable due to ownership may underestimate the potential for providing additional housing – by how much? Is it the same in all parts of London?

The implication that fragmented ownership can be got round by encouraging mixed use development (paragraph 3.25) is a bit of a non sequitur – the problem with ownership is that it often effectively stops development coming forward at all, not that it discourages types of development that include housing. In places like Westminster mixed use development is often a complex business, particularly given the density of heritage designations and in the past we have consistently excluded sites where the likelihood of redevelopment of the site being developed for housing is extremely low as multiple buildings in the street blocks are in different ownership. During the 2013 SHLAA process we were assured by officers that these sites would be taken out of the SHLAA system when they were identified as unsuitable previously – but they clearly have not.

We feel that it is naïve to imply that the market will eventually lead to ownership issues being overcome during the SHLAA period and large amounts of housing to result.

Applying the proposed approach to the extremely fragmented land ownership nature of some parts of Westminster is likely to result in an unrealistic housing capacity estimate for Westminster. The attached map shows a small snapshot of Westminster where there are some examples of large blocks which have been identified by the SHLAA system. The map also shows how much housing has been delivered on those sites in the past. Clive House shown in the bottom left of the map has delivered less than 70 units, whereas the SHLAA density assumptions would estimate this site as having the capacity to deliver 355 units. Likewise Queen Anne's Gate in the top right of the map is estimated to deliver 355 units based on density assumptions, but only 9 units have come forward. These, and the other examples on the map, illustrate that although portions of these blocks have come forward for housing delivery, this has been on a small scale as a direct result of disparate land ownership and the sites are not making a strategic contribution to our housing delivery.

This map is just a snapshot of the situation in Westminster and there are many other similar sites across the rest of the borough – particularly in the Core CAZ – where land ownership is fragmented like this and a severe limiting factor on realistic housing delivery. Large blocks, like those in Queen Anne's Gate, are likely to be particularly sensitive and require distinctive approaches which means housing capacity estimates will be more realistic if boroughs have greater ability to reflect these local circumstances in the light of their knowledge of circumstances on the ground.

Our concern is that including so many blocks in fragmented land ownership which are extremely unlikely to be brought together under one land owner to be developed for housing will create an unrealistic housing capacity for Westminster (even if the probability is reduced and the site is put in the later phases for delivery) and contribute to a false picture across London. We do not consider that reducing the probability by 20% under the 'High' category is sufficient as the probability of sites such as these coming forward for housing is much much lower – to the extent that we cannot see them being delivered by 2041 and we should therefore be able to exclude these sites from the system.

Where the market won't overcome the impediment it's also naïve to think that the public sector will step in – given values here we don't have the resources to do so.

We therefore urge the GLA to amend the methodology to reflect this concern.

Secondly, we are puzzled about the lack of recognition given to the importance of office uses in the West End (there are explicit references to the City and Isle of Dogs, but only one fairly ambiguous one (in paragraph 3.44) to other parts of the CAZ. Our Core CAZ ought to be treated in the same way – we have, after all, just changed policy to give greater priority to commercial development here (following the lead in the FALP) and benefitted from the exemption from office-to-resi permitted development rights. We should be able to exclude office sites in the core CAZ.

Thirdly, the recognition of heritage issues is vague and we are concerned that they aren't mentioned as being among the things the LSE work on density models will take into account at all.

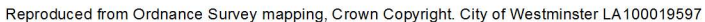
Finally, the SHLAA system should be able to exclude colleges and universities the same as schools.

We look forward to working with the GLA over the coming months on the SHLAA.

Kind regards,


PRINCIPAL POLICY OFFICER
Policy, Performance & Communications Department

Westminster City Council
15th floor, East
City Hall
64 Victoria Street
London SW1E 6QP



[REDACTED]

From: Jenifer Jackson [REDACTED]@RBWM.gov.uk>
Sent: 23 January 2017 10:30
To: London SHLAA
Cc: [REDACTED]
Subject: London Draft SHLAA Methodology: consultation response from RBWM

I am writing in response to your consultation on your draft SHLAA methodology.

RBWM would support the approach outlined to the SHLAA set out in the draft methodology. It uses reasonable sources for the identification of sites and the assumptions used with regard to the deliverability and capacity of sites appear sound. However, we still have concerns with regard to how the SHLAA will be used and in particular the Mayor's approach to Green Belt and industrial land.

Green Belt

The SHLAA correctly identifies Green Belt as a constraint to development. However, the Mayor should make it clear that if the SHLAA indicates that London is unable to meet its identified need through existing sites then a review of the Green Belt within London should be undertaken. This review should assess whether there are areas in the Green Belt that no longer meet the purposes of these policies and as such may offer opportunities for further development. In addition Planning Practice Guidance (Ref ID:3-011-20140306) highlights that sites that have constraints should still be included in any assessment and that it is important to test previously defined constraints rather than simply accept them. As such, unless a review is undertaken any new London Plan would not be in conformity with national policy and could be considered to be unsound.

Industrial land

Any future studies on the potential for industrial land to be used to meet housing needs must not place pressure on other areas to support these uses. The Mayor must use their assessments of employment need and employment land review to establish needs and how those needs should be met. The statement made in the SHLAA refers to scenarios that reflect a London centric position that could see the release of industrial land that places demand pressure on areas outside of London.

Kind regards,

Jenifer Jackson
Head of Planning
Corporate and Community Services
Royal Borough of Windsor & Maidenhead
Town Hall, St Ives Road, Maidenhead SL6 1RF
[REDACTED]

Website: www.rbwm.gov.uk
Follow us on Twitter: @RBWM
Like us on Facebook



Historic England

[REDACTED]
Strategic Planner
Greater London Authority
City Hall
The Queen's Walk
London SE1 2AA

Tel: [REDACTED]

23 January 2016

By email: [REDACTED] london.gov.uk and
LondonSHLAA@london.gov.uk

Dear [REDACTED]

London Plan Review: Draft SHLAA Methodology

Thank you for the opportunity to comment on the draft SHLAA methodology for the London Plan Review. Historic England is pleased to engage with the GLA on this important component of the London Plan Review as the Government's adviser on the historic environment and as a member of the Strategic Housing Market Partnership Group.

Historic England is keen to ensure that the protection and enhancement of the historic environment is fully taken into account at all stages and levels of the London Plan process. We therefore encourage you to consider how heritage issues are managed in national policy and guidance as set out in the *National Planning Policy Framework* (NPPF) and *Planning Policy Guidance* (NPPG); and Historic England's Good Practice Advice (GPA) notes, specifically Local Plans (GPA1) and our Historic Environment Advice Note (HEAN) on *Historic Environment and Site Allocation* (HEAN3).

Both the GPAs and HEANs mentioned and others can be found via the link below:
<https://historicengland.org.uk/advice/planning/planning-system/>

National policy clearly states the planning system should contribute to the achievement of sustainable development (NPPF para 6) which comprises of economic, social and environmental 'dimensions', and gains should be achieved in all three jointly and simultaneously (NPPF para 8). As an environmental 'dimension', the conservation of 'heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations' is



Historic England, 1 Waterhouse Square, 138-142 Holborn, London EC1N 2ST
Telephone 020 7973 3700 Facsimile 020 7973 3001
HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available.





identified as a core planning principle (NPPF para 17). Therefore a requirement is for an active, positive approach to conserving and enhancing the historic environment which also recognises the value that the historic environment can bring to inspire high quality design in new development (paragraphs 126, 157, and 58 to 61).

Reflecting national policy requirements, national guidance (NPPG) for assessing housing and economic land availability makes clear references to the management of heritage issues. In particular the need to demonstrate an understanding of what type and scale of development may be appropriate (NPPG para 014), recording characteristics of the site and its surroundings (NPPG para 016), and assessing the site's suitability now and into the future in terms of impacts upon heritage conservation (NPPG para 019).

The London Plan review and the consultation on a revised SHLAA methodology provides an excellent opportunity in which to ensure heritage issues are taken fully into account when identifying the viability and capacity of potential sites for future sustainable development. On considering the details provided we have the following headline points concerning the SHLAA methodology:

- Not all heritage assets and their potential impact upon the capacity and deliverability of sites appears to have been fully considered. The historic environment should not be seen as a barrier, but provides opportunities to deliver sustainable integrated development that optimises potential. However where heritage assets are mentioned, principally listed buildings and scheduled monuments, they are considered in the context of 'excluded sites'. This narrow identification of heritage is contrary to national policy which views the historic environment as a contributor to growth and positive change. We would therefore urge the SHLAA methodology to be more nuanced to the potential of heritage assets being able to deliver growth without compromising their significance.
- We appreciate that a density matrix is a useful tool in which to illustratively guide the development potential of sites. However we are concerned that the basis on which the density levels are identified is limited to housing stock type and proximity to town centres. These indicators, we would suggest, do not capture the attributes that determine the character or setting of a place, such as local distinctiveness. Our concern is that a homogenous approach to density, and therefore development, could be unintentionally delivered contrary to the diverse and distinctive historic and local characters of London.
- We note the scenario testing employed as part of the methodology, especially in the context of identifying a 'tipping point' for infrastructure-led development has been identified. Has scenario testing been applied in the context of environmental capacity, so testing the potential of sites without causing harm to the significance of heritage assets?

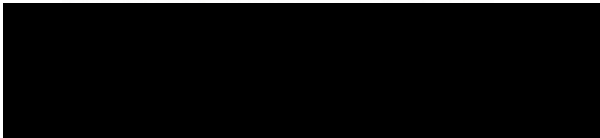


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- We note that in the context of large sites, town centres and Opportunity Areas a default single figure is suggested to guide potential density. This appears to imply that these areas have no existing character to reflect and integrate. In addition it is assumed that robust masterplans and development frameworks which take into account the local and historic character of a place have been undertaken and embedded in future development parameters.
- The methodology provides an opportunity for Boroughs to adjust densities which is welcomed. However the scenario for this to happen appears to be guided by the presence of design-led masterplans. We would suggest that the tools needed to help support an adjustment of density figures should also include heritage management plans such as up to date Conservation Area Appraisals and Management Plans. The methodology needs to reflect the need for heritage assets to be appropriately integrated and managed by reference these and other assessments of significance.

We seek to provide these comments as constructive advice and would welcome the opportunity to continue to work with the GLA and boroughs in the site assessment process in relation to heritage and character issues as the suitability and capacity of sites is considered in the coming months.

Yours sincerely



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Historic England's specific comments on the draft SHLAA Methodology

Background

Historic England recognises the great challenge of providing for London's housing within the boundaries of Greater London. The capital's historic environment is a key ingredient of what makes our city special; conservation and integration of heritage will help with achieving sustainable development. The process of identifying capacity needs to be based on both broad assessment and nuanced understanding of London historic environment so that development respects and enhances this positive asset.

In our view the SHLAA needs to be both robust and flexible - allowing adjustments to 'rule of thumb' standards to suit local areas and sites, based on an understanding of heritage and townscape. We believe this aligns with national policy for sustainable development. The historic environment is a 'constraint' (ie. a parameter to work with) but importantly it is a positive attribute that pays economic and social dividends, enhancing the quality of life of Londoners.

Historic England has commissioned research to understand the different capacities of areas taking a cross section of sites in London. It is evident that all types of areas can contribute to the capital's growth while maintaining heritage significance. However, that capacity varies enormously depending on the nature of the areas and their valued characteristics (Allies and Morrison, *Local Character and Density*, September 2016). We have commissioned an audit of Borough-wide Characterisation reports across London (Land Use Consultants, *Characterisation of London's Historic Environment*, August 2016)¹ which identifies the coverage of characterisation and the scope for this to be better integrated into policy making and decision-taking. We would be pleased to share these research findings with you.

The context for reviewing the SHLAA process is provided by other background reports. The Inspector reporting on the Further Alterations to the London Plan (FALP) noted the dangers of over applying standards without regard for locality, stating that an increase in density cannot always be assumed appropriate in response to increased PTAL. *"The impact on increasing density on townscapes (including the historic environment), existing communities and on social and physical infrastructure also needs to be considered...."* (para 41). He goes on to say *'It cannot be assumed ... that it will be appropriate to increase densities over the existing Density Matrix guidelines in all cases. Town centres are accessible locations but each has its own character which new*

¹ The LUC report is available on Historic England's website at:
<https://content.historicengland.org.uk/content/docs/get-involved/luc-characterisation-london-historic-environment-exec-summary.pdf>



development should respect. Opportunity Areas and large sites have the potential to determine their own character and identity but should still have regard to their surroundings. Meeting the pressing need for housing in London will require new, innovative and possibly unpopular solutions but care must be taken not to damage its environment such that it becomes an unpleasant place to visit, live and work.” (para 42)

The Outer London Commission (seventh report), ‘Accommodating London’s Growth’, also refers to the problems of mechanistic application of densities. It notes that “There is no ‘one size fits all’ solution for town centre renewal/redevelopment so any intensification would have to take account of the particular needs and characteristics of the individual town centre such as heritage and cultural assets as well as local character” (para 4.21). The Commission suggests the intensification of parts of selected town centres.

Taking national policy and guidance forward our detailed comments are set out below.

Detailed comments

Sources of capacity

All sites should be assessed for their suitability NPPG, para 031, including where planning permission exists. Where past trends are used (eg. for small sites) an assessment of whether the quality of such developments is generally high would assist in ensuring that good outcomes are achieved in future.

While the need to avoid under-estimating housing capacity is clear, (para 1.6) the dangers of imposing densities that are unattainable without harm to the environment, including the historic environment, should likewise be avoided. The potential for additional intensification in town centres (para 1.7) should take account of assessments of historic character and townscape value, rather than being applied in a quantitative manner. Both the FALP Inspector (para 42 of his report) and the Outer London Commission point to the need for a tailored, more selective, approach.

Density estimates

A crucial weakness in the current London Plan Density Matrix is the definition of character ‘setting’ (suburban/urban/rural) by the attributes related to housing stock type and proximity to town centres. This fails to reflect the townscape and heritage values of an area and therefore, if applied without refinement, would lead to damaging results.

On large sites, town centres and Opportunity Areas a default density assumption is used, a single figure, related to its setting and PTAL scoring. All three types of sites have different figures – why is this?



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The proposed revised density matrix in para 2.2 (p5) while seeking to 'optimise' development (para 2.6) in reality would result in 'maximising' without regard to the quality of the places concerned and their heritage.

A key concern is that the revised density matrix seeks to raise densities to another level for town centres, so that Major and Metropolitan town centres (which may be in outer London locations) would be classed at the density of Central London locations. This could not only lead to loss of valued historic character but to the homogenisation of town centres across London.

Within Opportunity Areas it should be noted that many contain heritage assets, or should be developed to respect the settings of heritage assets outside their areas. The standard approach in table 3 requires flexible application according to the location. It should also be noted that the London Plan review should consider a range of options for allocating development and that densities based on past trends should be critically appraised as to whether the outcomes represent sustainable development. OAPF capacity studies are mentioned in para 2.15 – the quality of many of the Opportunity Area Planning Frameworks has been poor in terms of integrating consideration of the historic character and assets of the areas. This should be factored in when considering past trends.

Borough amendments to density estimates (paras 2.11-2.13)

The adjustment of density assumptions will be crucial to ensure that a 'one size fits all' approach is avoided and density assumptions are adapted to reflect sensitivity. This exercise should take account of the heritage assets within a site, and the setting of heritage assets outside where this may be affected by the development of the site.

Characterisation of townscape and heritage assets should be clearly identified as a resource to inform adjustments in density. This should include information contained in borough characterisation reports (providing an understanding of typologies, scale, grain, views and valued townscape and heritage significance), historic area assessments such as conservation area appraisals and management plans, World Heritage Site management plans and statements of outstanding universal value, and information on Archaeological Priority Areas and the Historic Environment Record.

Constraints testing

The National Planning Policy Guidance (NPPG) identifies the site characteristics that should be recorded, including the character of the site and the surrounding area, and environmental constraints (NPPG, paragraph 3-016-20140306). Stage 2 of the process requires assessing suitability, which should be guided by the development plan, emerging plan policy and national policy (NPPG paragraph 3-019-20140306). In addition, factors that should be considered to assess suitability include potential impacts on landscapes and 'heritage conservation'.



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Table 5 identifies very limited constraint categories and heritage assets are not included. These constraints are used to inform probability of development coming forward, to encourage consideration of mitigation/avoidance measures and therefore inform both capacity and delivery of sites. With no heritage considerations we question whether the environmental dimension of sustainable development (and the historic environment as a key element) is being fully considered. In our view this is not reflected, nor is the stage 2 NPPG methodology.

We therefore suggest that the constraints table identifies heritage assets, within the environmental constraints. This should allow integration of heritage issues within the process, and a positive response to these matters, including historic townscapes and archaeology. Designated open space should explicitly include all Parks and Gardens of Special Historic Interest on the national register. In some cases, such as archaeology, consideration will rarely prevent development but should be considered from the outset in Archaeological Priority Areas so that mitigation and funding for preservation can be factored in. For other heritage assets, consideration at an this stage should allow capacity for change to be identified early, so ensuring the local and strategic value of heritage to London is safeguarded.

With respect to industrial land assessments, assessments of historic interest can assist in understanding potential. In 2015 Historic England produced a research report which assessed the significance of gas holder sites in London. This could also assist in identifying the potential of the 20 such sites submitted in the call for sites, and is available on our website at:

<http://research.historicengland.org.uk/Report.aspx?i=15319&ru=/Results.aspx?p=352>.

The section on excluded sites addresses those which include listed buildings or a scheduled monument where development or intensification is unlikely. While we support this acknowledgment of the need to address heritage assets, the range of assets and the approach suggested requires more nuance, based on significance of the asset. We recommend that this category in 3.34 is amended to 'Sites which include designated heritage assets, or potentially affect the setting of heritage assets, whose conservation and significance would be harmed'.

Guidance on this to the boroughs should promote assessments of the significance of the heritage asset and capacity for change without harming that significance, and apply to all heritage assets. Suggestions for development involving facadism or enabling development should be avoided, as these matters require exceptional justification on a case by case basis. They can only be considered when a thorough examination of the significance and conservation needs of the asset have been fully analysed. Enabling development in NPPF terms (para 140) has a specific meaning in that it is normally contrary to policy and assists exceptionally where a conservation deficit applies and is



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fully justified according to the specific criteria set out in Historic England's advice². This should not be applied as a more general principle.

The emerging Opportunity Areas listed in 3.47 include the Golden Mile/Great West Corridor and Kingston. Both these areas contain highly significant heritage assets and have the potential to impact on assets in adjoining boroughs of even greater significance. The need for a strong evidence base for each of these potential OAs is clear. This should include an appraisal of the sensitivity of surrounding heritage assets. We also urge that the local plan's role in each of these areas is identified as the statutory plan will bring with it the level of public engagement and specificity with regard to sites that OAPFs as supplementary planning guidance cannot.

Scenario testing

The Review provides the opportunity to consider innovative approaches as suggested by the Inspector in his report on the Further Alterations to the London Plan. Historic England wishes to engage with the GLA and the boroughs to discuss how the strategic and local value of London's heritage can be integrated into consideration of different scenarios.

² Historic England's advice 'Enabling Development' is available on our website at: <https://historicengland.org.uk/images-books/publications/enabling-development-and-the-conservation-of-significant-places/>. Please note this will shortly be updated to align with the NPPF, and be published as GPA4



London Tenants Federation

19.01.16

LTF response on SHLAA methodology

The National Planning Policy Framework requires planning authorities to have a clear understanding of housing needs in their areas (including scale, mix and range of tenures) through preparing a SHMA, and to also prepare a SHLAA to establish realistic assumptions about likely economic viability of land to meet identified need for housing over the plan period (NPPF).

We assume that these two documents are supposed to work in conjunction, in order that the land available for housing might meet the range of needs identified. Sadly, in London, this is not the result. The extremely high level of need for social-rented housing, consistently identified in London SHMAs at 50% or more of total need, has never been delivered through the identification of housing land sites (or indeed London Plan targets).

On the contrary, in practice, the identification of housing land, regardless of London Plan targets, has simply resulted in any available land being covered with a larger quantity of for-profit homes at much higher quantities than SHMAs have identified as being needed. LTF's assessment of delivery of housing targets shows that between 2005 and 2015 London Plan targets for market housing (equal in the past to 50% or 59% of the total target), have been over-met (at 124% of target and 70% of the total homes delivered). Social-rented homes, however, have been significantly under-delivered (only 53% of target and just a miserable 17% of the total homes delivered) ¹

It has been argued at SHLAA meetings (by GLA officers) that the problem of failure to deliver homes to meet need, in terms of affordability, can only be addressed by delivering a lot more market (for-profit) housing. We question what evidence there is that such a (continued) strategy might be successful and how long it might take. LTF members feel that in order to properly address the range of housing needs in London, alternative approaches must be applied, including through specific protection of some land for not-for profit housing and restrictions on market (for-profit) housing development.

Specifically, in response to the draft SHLAA methodology LTF proposes that

1. **The SHLAA (methodology) should begin with an introduction that makes it clear that the identification of land for the development of homes in London has not (in an evidenced-based fashion) resulted in the delivery of home to meet the full range of identified housing needs set out in previous London-wide SHMAs** (with the exception of the identified need for market - for-profit housing - which has consistently been over-met/delivered). It should specifically

¹ [http://www.londontenants.org/publications/reports/10%20years%20-%20housing%20targets%20\(F\).pdf](http://www.londontenants.org/publications/reports/10%20years%20-%20housing%20targets%20(F).pdf)

state that for this reason, there will be changes to previous SHLAA methodologies in an attempt to provide solutions to this serious problem.

2. **In an attempt to address the fact that the strategy of delivering sufficient social-rented (not for profit) homes needed, on the back of market (for profit) development, has consistently failed, combined with the London Mayor's apparent intention to deliver homes that are 'genuinely affordable,' the SHLAA methodology should add a section entitled 'sites excluded from private development'. LTF proposes that this should include all existing social-housing estates and gypsy and traveller sites.** Delivery of market (for-profit homes) on social-housing land through estate regeneration has, in almost all instances, resulted in a loss of social-rented homes or, where any new have been delivered, they have simply been replacements for others lost through demolition (rather than additional supply).

In some instances, residents of existing social-housing estates would be open to development of some additional social-rented homes on their estates. A methodology for identifying where tenants would support this, could be applied in an effort to increase social housing delivery.

LTF argues that this is particularly important at a time when no grant funding is available for delivery of social-rented homes and when only this week, the Chartered Institute for Housing suggested that nationally, by 2020, there will be a loss of 250,000 social rented homes (through Right to Buy and conversion to affordable rent homes). We note that the CIH analysis does not include loss of social-rented homes through demolition (which the London Assembly Housing Committee identified as being 8,000 from 2005-15). We are aware that the Mayor is not expecting conversions of social-rented homes in new contracts for delivery of affordable rent homes – but this could be strengthened as proposed here.

Necessarily section 3.46 should be removed from the SHLAA methodology.

3. **All public land should be excluded from private development.** Public land should be identified exclusively for not-for-profit housing to be delivered / provided by the boroughs, the Mayor, community land trusts or co-operatives, along with any necessary social and community infrastructure required.
4. **Table 6 should be revised in order that Locally Significant Industrial Sites have a 0% probability assumption or simply applied protection.** LTF is concerned that the ongoing loss of industrial land (which would generally provide jobs for working class communities, many of who live in social-rented homes). It is essential that employment opportunities for working class households are supported and increased on existing industrial land. Using this land for market (for-profit) housing to increase land values, make delivery of not-for profit homes less likely and brings benefit only to developers and those that can afford over-priced 'for profit' housing. This is not a strategy that should continue to be pursued.

5. **Assumed densities should be no higher than the top range of the relevant density range for an Opportunity Area.** We are concerned about section 2.8 and assumptions that sites in suburban settings could potentially be developed at urban densities, sites in urban settings could be developed with central London densities and those in central settings with central+ densities. The London Plan (2.62) says that densities in OAs should be 'towards the top of the relevant density scale where appropriate' – not at a level higher.

Particularly there is concern that density levels assessed in the SHLAA are then transferred (without full and proper assessment of the appropriateness) into housing targets for Opportunity Areas in the London Plan, then into OAPFs and Local Plans.

This has certainly appeared to be the case with regard to the Old Oak and Park Royal Development Corporation Area (where LTF works, with Just Space, in supporting a wide community network of residents and community groups called the Grand Union Alliance).

The OPDC area comprises three boroughs that have some suburban and urban areas. However, the housing targets – set out in the London Plan (presumably taken from the SHLAA), in the Old Oak and Park Royal OAPF and in the Regulation 18 Local Plan consultation presume above Central London densities (so two levels above relevant density levels). Constant concern has been raised by resident and community groups of this area – about both to the inappropriateness of such high densities and resultant building heights required to deliver such high housing numbers.

It is likely that, in this instance, higher than appropriate densities, will not be properly considered until the Examination in Public of a Local Plan. Surely this is not an appropriate or properly evidence-based way to assess the number of homes that might be delivered in Opportunity Area or others identified housing sites; more so in instances where these will not be subject to public examination of the entire area.

Your sincerely

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25 January 2017

Dear Sir / Madam

A RESPONSE BY THE HOME BUILDERS FEDERATION (HBF) TO THE MAYOR OF LONDON'S SHLAA METHODOLOGY

Thank you for consulting the Home Builders Federation (HBF) on the SHLAA methodology. The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational plc's, through regional developers to small, local builders. Our members account for over 80% of all new housing built in England and Wales in any one year.

Preliminary comment

The London SHLAA is an extremely important element of the evidence base for the London Plan. The previous exercise – the London SHLAA 2013 that was undertaken to inform the last London Plan (examined at the Further Alterations to the London Plan) was only able to identify land for 42,000 homes a year. This compared to an assessed need (OAN) which at the lower end of the range required 49,000 homes a year. The higher end of the range, where the backlog of housing need that has accumulated in London is addressed in full over the next 10 years will require 62,000 homes a year. This represents a significant shortfall in identified land capacity compared to need. London's unmet housing need is at least 7,000 dwellings a year, and is potentially much higher. This unmet need of at least 7,000 dpa is potentially rising as the London Boroughs bring forward new plans based on the new London Plan. Evidence to date shows that the London Boroughs are unable to 'close the gap' despite assurances by the Mayor to the contrary. Those Borough Plans that have been published or adopted post the new London Plan have so far identified housing requirements that are some 1,800 dwellings fewer than the minimum targets established in table 3.1 of the London Plan.

The table below shows the results to date of the new London Borough plans that have been examined or are being prepared and how many homes they are planning for:

	Borough Plan	London Plan	Increase/Shortfall
Bromley	641	641	0
Camden	1120	889	231
Croydon	1592	1435	157
Enfield	798	798	0
Ham' & Ful'm	1100	1031	69
Haringey	1502	1502	0
Hounslow	822	822	0
Lambeth	1195	1559	-364
RBKC	535	733	-198
Southwark	2000	2736	-736
Tower Hamlets	2885	3931	-1046
Wandsworth	1812	1812	0
Totals	16002	17889	-1887

The results to date show that the London boroughs are failing to lift supply above the 42,000 dpa benchmark baseline. Indeed, there is a shortfall of 1,887 dpa against the benchmark baseline let alone the OAN of 49,000 dpa. The scale of the undersupply in London against the OAN of 49,000 dpa will tend to fuel housing cost inflation (prices and rents) exacerbating the affordability crisis in London.

There is no strategy in place to address London's unmet need through cooperation with the authorities of the wider south east. Indeed, the Mayor considers that he is not responsible for the Duty to Cooperate because the London Plan is not a development plan document but a spatial development strategy according to Section 38(2) of the 2004 Planning and Compulsory Purchase Act 2004. Therefore, the Mayor cannot discharge the Duty to Cooperate on behalf of London's 35 local planning authorities (the 32 boroughs, the City of London and the two development corporations). Because there is no effective mechanism to coordinate the views of the 35 London planning authorities in their discussions with the authorities of the wider south east (and the examination of the London Borough local plans shows this to be the case), the Mayor will have to meet his own needs within London's administrative boundary.

The Mayor's assurance that he will close the gap and provide for at least 49,000 dpa is therefore unfounded and unsubstantiated. The performance of the Boroughs to date confirms the Inspector's view in 2014 that the London Plan strategy will not deliver sufficient homes to meet the objectively assessed need (see paragraph 57).

The extent to which the Mayor can continue to rely on the recycling of land in London is questionable. It is time that the Mayor considered a different approach to planning for housing in London. As the examining inspector concluded, an immediate review is needed "*to explore options beyond the existing philosophy of the London Plan*".

The new SHLAA study through its choice of sources of capacity is indicating that the Mayor does not consider that a new approach is being considered – an approach that differs from the 'compact city' approach pursued by previous Mayor. This appears to have influenced the choice of the sources of capacity. The Mayor is therefore allowing current policy considerations to influence the selection of the sources of supply. This is contrary to the guidance in the PPG and there is a risk that the OAN will be influenced by judgements about capacity.

Study period

We note that the SHLAA is intended to inform the next London Plan (paragraph 1.1). In paragraph 1.1 we note that the exercise is intended to cover the period 2016 to 2041. It is unclear, however, what period the new London Plan will be intended to operate over. The current London Plan operates over a period of 2015-2025. It would have been helpful if the draft document had clarified what time period the new plan will operate over.

Sources of capacity

In paragraph 1.2 the SHLAA lists four sources of capacity: approvals, allocations, potential sites, and small sites.

The Mayor will need to be careful with regard to existing approvals and allocations since, presumably, many of these will be contributing to the achievement of the current London Plan requirement for at least 42,000 dpa for the period 2015-2025. We are aware that the timetable for the adoption of the new London Plan is 2019. Depending on the plan period for the new London Plan, the GLA could only include approvals and allocations that are expected to come forward in the period when the new London Plan commences.

Designated open space

The Mayor has decided that all designated open space is classified as unsuitable for residential development (paragraph 3.7). This includes the green belt. The continuing protection to be accorded to the green belt is unjustified in view of the public investment in Crossrail and other transport projects which will improve travel across London. Settlements within the metropolitan green belt that have Crossrail and other rail stations should be allowed to grow through the redrawing of green belt boundaries that currently constrain these places from fulfilling their potential. Emerging government national planning policy may encourage this. London also needs to do this in order to accommodate its own housing needs. We are aware of the letter from the South East Councils to the Deputy Mayor of 8 December 2016, registering the disquiet of the wider south east authorities with having to deal with the consequences of the Mayor failing to prioritise meeting London's own housing needs over protection of the green belt. This letter indicates that any discussions under the Duty to Cooperate will fail to resolve the problem of the Mayor's unmet need and his migration assumptions. This will not result in a programme of new settlements and expanded towns able to accommodate London's unmet need and increased (above trend) out-migration. All the new settlements that are currently being built (e.g. Whitehill Borden and Ebbsfleet) or are proposed in the wider south east, are conceived to meet the housing needs of the relevant south east authorities within which these settlements are situated.

The Mayor's approach of placing the green belt off-limits for the purpose of the SHLAA assessment does not adhere to national planning guidance. The Planning Practice Guidance (PPG) says that *"sites, which have particular policy constraints, should be included in the assessment for the sake of comprehensiveness but these constraints must be set out clearly, including where they severely restrict development. An important part of the desktop review, however, is to test again the appropriateness of other previously defined constraints, rather than simply to accept them."* In the spirit of the PPG we consider that the Mayor should encourage the London Boroughs to put forward options for growth within land that is currently constrained by the green belt. The Mayor may still decide that these are unsuitable for development because he wishes to adhere to the current green belt boundaries, but they will indicate to the public and other bodies the potential options that are available to the Mayor if he wished to prioritise accommodating London's housing needs.

Overcoming constraints

We note table 9. This does not include the green belt. This is a mistake. In view of the scale of the London housing crisis and the need for a 'step-change' in the Mayor's response (according to the recent National audit Office report *Housing in England: overview*, January 2017) the GLA ought to support the review of green belt boundaries to optimise the contribution around transport nodes and other sustainably located places.

Yours faithfully

[REDACTED]
Strategic Planner

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Just Space response to consultation on SHLAA Methodology
January 2017

To: [REDACTED] London Plan Team, City Hall, London
SHLAA@london.gov.uk

Dear [REDACTED]

Following the consultation meeting on 1 December we have considered the draft Methodology paper. These are the crucial comments from our network. There are many minor points we might wish to make but it seems wiser to concentrate on these key points.

The LTF and LFCAS, which are part of the Just Space network, are commenting independently.

We shall be writing separately (to James Gleeson) about the (SHMA) study of housing needs and demands which you said is running to a later timetable.

1. We do not accept the validity of the distinction between ‘technical’ and ‘policy’ issues which underlies the decision process on the SHLAA because there are so many crucial policy issues embedded within the coefficients and definitions of the Land Availability process. That's why we are so glad that community interests are included in the ‘technical consultations’. The same has happened with your colleagues in GLAE over the Economic Evidence Base: congratulations to them too¹.

2. A major concern is about the serious threat to the diversity and robustness of the London economy, to the livelihoods of many Londoners and the increased need to travel which would result from:

- (i) continued attrition of Strategic Industrial Land SIL. The losses in recent decades have been much more severe than provided for in the Plan and we consider that a complete moratorium or at least a presumption against loss is called for²;
- (ii) losses of workspace (offices etc) under the Permitted Development Rights over which the Mayor and Boroughs have little control, but which exacerbate the damage to the economy and loss of suburban jobs;
- (iii) the prospective risk of workspace losses which would result from the redevelopment in depth of some of London's high streets, areas where extensive research has been done, showing what a large and diverse range of jobs are done in and behind the frontages. The implications of these embryo policies and the conditions which should attach to them will not be clear until the Plan is made but, in the mean time, the inclusion of housing targets for these areas adds dangerously to the threat to the economy.

We remain very dissatisfied by the fragmentation of studies of the London economy and its space requirements: split between retail, offices, industrial – and with industry further split between supply and demand studies.

At the very least, Boroughs and/or the Mayor should be required to indicate the numbers of existing jobs in sites included in the SHLAA. (In the longer run we shall be arguing for systematic local economic studies to **precede** such changes.)

2. An equally crucial main concern is that existing social housing is being sacrificed on the altar of total housing numbers and that the London Plan would be quite wrong in facilitating further losses of social housing through estate “regeneration”. The proper place to debate this priority is of course in the preparation of the London Plan. However the SHLAA should avoid counting (even as low

probability sites) estates where consultation and formal approval and planning processes are not complete. Thus we are very unhappy with

“Estate regeneration schemes

- 3.46 *Boroughs are able to include large sites included in an estate regeneration programme. As these sites include existing residential dwellings, the SHLAA system allows boroughs to amend net additional housing figures included in the system and by phasing period in order to take into account demolitions and build out rates over time.”*

Specifically (a) the inclusion of such estates is premature until the schemes are agreed; and (b) the numbers of existing and proposed units in each category (social rent, LLR, “affordable”, etc) should be required and be publicly recorded.

We are also unhappy that proposals to use school and recreational sites for housing can be included by Boroughs in the SHLAA before they have been fully approved. Our member organisations are increasingly concerned about these losses of social infrastructure.

3. The SHLAA should also seek to estimate the required capacity for **new Gypsy and Traveller sites**, which contribute to meeting objectively assessed need. Given that to date very few local authorities have identified a 5-year supply of land to meet these needs in line with national planning policy, this approach would support councils in overcoming some of the barriers to delivering Gypsy and Traveller accommodation and meeting their Public Sector Equality Duty. In addition, to ensure existing Gypsy and Traveller sites are safeguarded for future generations, this designation should be added to the list in paragraph 3.34 under ‘Excluded sites’.

4. Finally on a matter of process/procedure. It was mentioned at the December meeting that all the sites in the SHLAA (except the confidential ones) would be included in the online database and that this would be visible in map form for the first time. This is immensely valuable and will be a boon to community groups in London. Please can you confirm that this **mapped material** will be publicly accessible.

Just Space
January 2017

¹ See <https://justspace.org.uk/2016/05/28/what-london-economy>

² Just Space, 2016, [Towards a community-led plan for London: policy directions and proposals](#), Policy C, p28

[REDACTED]

From: [REDACTED]@environment-agency.gov.uk>
Sent: 20 January 2017 13:08
To: London SHLAA
Cc: [REDACTED]
Subject: Feedback on draft Strategic Housing Land Availability Assessment (SHLAA)
Attachments: Draft SHLAA methodology. EA comments Jan17.SW.docx

[REDACTED]

Thankyou for the opportunity to comment on the draft SHLAA methodology. Please find attached our comments which I hope are helpful. Our essential response is that the draft requires development. It does not yet sufficiently take account of environmental considerations in identifying, and guiding others on, housing land capacity (as I mentioned at December's SHLAA Steering Group meeting). Please do not hesitate to contact me if there are any queries.

Regards,

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Environment Agency	OA Densities	OA's may be constrained by other factors, such as land contamination, Air Quality Management Area status, proximity to / displacement of waste operations, surface water management etc. I would suggest rather than adopt a broad assumption of higher densities in OA's, that there is a further level of capacity assessment required to inform the SHLAA
Environment Agency	Amending densities	I recommend that this is not left to local level assessment. There is a range of evidence available currently e.g. AQMA's, RFRA, etc that should inform the GLA's density assessment for individual growth areas.
Environment Agency	OAPF densities	Can be lower
Environment Agency	Constraint categories	Some Policy constraints are environmental, some economic. Again Delivery constraints includes land contamination with is environmental. Confusing? – consider dividing up differently.
Environment Agency	Table 5 constraints	Important: Table 5 does not adequately cover Environmental constraints. Areas to cover may include: <ul style="list-style-type: none"> • Flood risk to explicitly include tidal, surface and fluvial. • Water supply • Wastewater treatment capacity • Sewer capacity e.g. a real issue in OPDC for the combined sewers serving Counters Creek. • Waste operations – proximity to / potential displacement • Air quality e.g AQMA's • Designated nature conservation sites • Cultural / heritage assets, inc. parks and other green • Infrastructure –higher density development may fragment GI • Water quality. Source Protection Zones e.g Lee Valley, which will inform activity / development type above it. Sub-divide into Land, Water, and Air?
Environment Agency		The SHLAA is 'light' on the link to transport e.g. Crossrail,1 and 2, HS2, Northern Line extension etc. Suggest somewhere, consider impact of major schemes on potential / probability of housing quantum / density / phasing.
Environment Agency		Suggest that adjustment is made for social and environmental infrastructure.
Environment Agency		'Designated open space' – Question whether this is a Policy constraint or Environmental constraint?
Environment Agency		SINC, SSSI...and other National designations. or in ALGG SPG? Need here perhaps to also list heritage assets settings e.g. Kew? How about Blue Ribbon Network which are placed under pressure from marina based- development and proliferation of house boats
Environment Agency		It is not clear whether waste operations are in the category of 'industrial land'. It is suggested that in view of London's huge challenge in meeting current policy objectives for waste self-sufficiency, that waste operations should be safeguarded from automatic release to other uses. Perhaps refer to safeguarded waste sites in Local Plans?
Environment Agency		Environmental constraints -The identified range is currently insufficient. Recommend re-visit this set of constraints.
Environment Agency		Flood Risk - Expand list, and consider probability impacts Updated data has been supplied to GLA evidence team on GIS layers Jan/2017. Refer also surface water explicitly, and to the role of boroughs as Lead Local Flood Authorities, and to borough's Surface Water Management Plans. These risks may be off-site / downstream of a site identified for housing, so

		potential need to be considered in the light of RFRA / SFRA
Environment Agency		As a general point I think 'constraints' reads negatively. Properly considered the environment can enable housing quality and capacity. Perhaps use the term 'Considerations'?
Environment Agency		Recommend historic parks , and designated sites of nature conservation importance are included in the 'Excluded' list. Also perhaps GI recognised in the All London Green Grid SPG?
Environment Agency		We would recommend keeping to the NPPF approach. As is. London's gardens remain under significant pressure for development as hard-standing and development. Running an alternative scenario, where housing development on residential garden land is included in completions may place a heavier reliance upon the development of gardens for housing, counter to the NPPF, and the Mayor's aims for 'greening' London.