

**Informal Meeting of London Assembly Planning Committee Members –
9 October 2018
Transcript of the Draft London Plan and Housing in Outer London**

Navin Shah AM: If we can carry on with the type of work infrastructure and character issue.

Jane Richardson (Assistant Chief Executive Growth and Regeneration, LB of Bexley): Again, it is nice when someone goes first because I just have to say, “Yes, I agree with that”. However, for us, the issue would not be about bicycle parking. It would be about car parking still in converted buildings because Bexley still just have, unfortunately because of a lack of public transport infrastructure, a very high car usage. In fact, it is bucking the London trend and it is increasing.

With regards to the character in our conservation areas, we have seen some conversions, not many. I suspect, unlike Croydon, I am not sure, but I suspect, the character of our housing stock is very different. Most of our housing stock is post-war. We do not have a proliferation of large villas set on quite significant plots. What we do tend to have, we have some Victorian premises, but most of them do tend to be post-war semi [detached] and terraces of varying scale that do not lend themselves quite as ready and quite as easily, possibly, to some of the properties that have been mentioned in Croydon. I do not know that for sure, but my instinct would be that might, in part, be the case, that our housing stock is far more post-war and even 1960s and 1970s.

Heather Cheesbrough (Director of Planning and Strategic Transport, LB of Croydon): I talked about conversion. Your general question was about opportunity.

Navin Shah AM: Character and also in terms of what implications or impact are on infrastructure.

Heather Cheesbrough (Director of Planning and Strategic Transport, London Borough of Croydon): Implications on infrastructure. As I said earlier, the real concern is that we are obviously trying to meet the Mayor’s Transport Strategy targets and if we can get to an 80% of what sustainable modes of transport by 2041. We are seeking to contain and control car parking. It is a key way of doing it, but we do also have to take heed of the fact that some of these small sites have got very low PTALs.

What we are doing, we have agreed with Transport for London (TfL) to undertake a bus review, a borough bus review of routes. This is important because, in Croydon, we have got good north/south movements, but we have got very poor east/west. In the south of the borough, we have got areas with not great bus movements and services at all.

That bus review is important. We are promised, by the Mayor and TfL, that bus services are going to move from inner London to the outer London boroughs. We need to see that happen on the ground so that when residents quite rightly object to smaller sites in housing coming forward, higher densities, we can say, “Well, look, this is going to support bus movements, bus travel”.

We also have a very clear walking and cycling strategy as well. In Croydon, we are challenged because we have got quite significant typography. We are looking at doing things like e-Bikes. We do need to have more trams; that is another thing, really important. Infrastructure is important. It is chicken and egg. One point,

having higher densities to small sites, intensification can help support more infrastructure like shops and local services which is a plus. But, in terms of transport, we do need more help from TfL and the Greater London Authority (GLA) in ensuring that is there.

Navin Shah AM: I absolutely agree. Unfortunately, whilst I welcome it, there is a current consultation out for the bus network in inner London. There is not one, that I know about, planned in the near future, especially with a strategic review of the outer London bus network. It is so critical given the kind of development that we are talking about; not just small sites. It is intensification but bigger sites as well. The opportunity here has not shown that additional priority for a public transport network which does not quite exist. Areas like Bexley or, not west London, which I represent, or going beyond Islington, where we do need that original priority for public transport which needs to be there which currently does not exist, unfortunately. Something that is --

Nicky Gavron AM (Chair): That is something we should be pressing for. We absolutely should be pressing for.

Robin Brown (Hayes and Harlington Community Development Forum): I just want to broaden the point about infrastructure from a Hayes, a local community perspective. I am very concerned about the adequacy of present levels of health, social and community infrastructure and trying to cope with the present burdens or pressures from development. That is an overriding issue locally. Recently, the Hillingdon Council with the GLA, published a development infrastructure funding study for Hayes Town which revealed that we need five forms of entry primary school now, immediately. That was a great surprise to everyone except those with children of school age.

Navin Shah AM: That is a point well made; social infrastructure.

Robin Brown (Hayes and Harlington Community Development Forum): Just a point I also want to make is that from reading the first edition of the Integrated Impact Assessment (IIA) into the Draft View London Plan, there was no real discussion of the equalities impact of this Policy H2 on small sites. Whether or not that has been addressed by the revised version of the IIA, I cannot say because I have not read it in depth. I just wanted to alert you to the just face response on that particular aspect of Policy H2 and the lack of consideration of the equalities that I mention. We do not know what the impact will be, accumulative impact of all the small site developments on vulnerable communities, neighbourhoods. Bexley is still here but we are not all well-appointed suburbanites. There is a great diversity locally in Hayes which has enriched our community.

Navin Shah AM: Thanks for bringing that to the table.

Nicky Gavron AM (Chair): I think so because we have dealt with conservation. As a wrap-up question, you have an appendix at the back of the briefing; which goes through all the questions or matters with supplementary questions that the inspector is currently asking. We still have a couple of days to put in other questions around this topic, and other topics, but we are on this topic. There is a question, which talks about, what is it, about transition?

Reece Harris (Assistant Scrutiny Manager): Yes, so it is question M19(g), which is:

"What will happen in the interim pending the work to prepare area-wide design codes referred to in policy H2B2?"

Nicky Gavron AM (Chair): That is just to give you an idea of one of the questions that is there. The inspector is more of less asking, "Is there going to be a transition period?" and I am just wondering around the points that were made around phasing and I think it was Helen who said, in terms of --

Heather Cheesbrough (Director of Planning and Strategic Transport, LB of Croydon): David said it and I agreed that there needed to be some sort of transition approach. I think fundamentally there is an issue because Local Plans work on a 20-year life span and London Plans work on 10, and so there is a bit of discussion about what is the housing target that you are dishing out to local boroughs because we have to plan in 20-year time periods, so if you set --

Nicky Gavron AM (Chair): But how long are your targets for, 10 years?

Heather Cheesbrough (Director of Planning and Strategic Transport, LB of Croydon): Ours is for 20 years, yours are for 10.

Nicky Gavron AM (Chair): Yes, we have given you 10-year targets.

Heather Cheesbrough (Director of Planning and Strategic Transport, LB of Croydon): Yes, but when we do our next iteration of the Local Plan we have to look at it in a 20-year planning horizon, so what is the target that we need to identify. There is a discussion about do we go with the 10-year one that is given by the London Plan and then possibly revert to a SHMA derived one, we could do it that way, or do we revert to our old Local Plan target, and I mean what is it?

Nicky Gavron AM (Chair): What would be the question?

Heather Cheesbrough (Director of Planning and Strategic Transport, LB of Croydon): There needs to be some understanding of what the ultimate housing target would be because it is quite confusing at times, you talk to people, you have an annual housing target, so ours, under the new London Plan, is 2,949 and you are saying that is for 10 years. But what happens after 10 years, because our new Local Plan will need to plan for 20 years? Do we take on that number over the whole 20-year lifetime of the plan or do we stop at year 10, which we cannot really do?

Nicky Gavron AM (Chair): When is your next development plan?

Heather Cheesbrough (Director of Planning and Strategic Transport, LB of Croydon): Since we adopted it in February 2018, we are going to kick straight off as soon as the new London Plan is out, because we need to bring ours into accordance with the new London Plan, so it will happen in the next two or three years.

Navin Shah AM: Would the revised household projections not be as important as whatever the London Plan ultimately says, in terms of that post-10-year period?

Heather Cheesbrough (Director of Planning and Strategic Transport, LB of Croydon): I do not know.

Nicky Gavron AM (Chair): We do not know yet. We do not know whether the Office for National Statistics projections from either population or household growth is really looking at a reduction in both population and household growth and whether they are going to be taken on board in this London Plan, but, if they are not,

they will be immediately looked at in an alteration that will come forward for sure. Also, the new NPPF will be taken on board too.

Heather Cheesbrough (Director of Planning and Strategic Transport, LB of Croydon): There is always a backlog, people never hit their target, so --

Nicky Gavron AM (Chair): Yes, it makes it very complicated, I am just wondering, we will have to try to work out a question from that. What about other things that might be relevant to ask the inspector?

Heather Cheesbrough (Director of Planning and Strategic Transport, LB of Croydon): Affordable housing is a really key issue and I am really pleased that the London Plan is challenging the NPPF in terms of affordable housing on sites of one to nine. Because the NPPF, the new one, is saying that you cannot ask for a contribution for sites of one to nine and the London Plan is challenging that and saying, "I think local circumstances should dictate that", and that is really important because we are looking, with the new housing target from the London Plan, that 50% of our housing is going to be provided through smaller sites. We have a 91% requirement for affordable housing in the borough. If we cannot negotiate or get any sort of contribution on those smaller sites we are going to not meet our affordable housing target whatsoever, so I think something around that is really, really important.

Nicky Gavron AM (Chair): That is a really good point.

Dr Riëtte Oosthuizen (Partner, Planning, HTA): Equally, to extend Section 106 [Agreement] even further because you can apply Section 106 further to, not just the affordable, I completely agree with Heather's point, but then also the questions around the infrastructure, like schools or local health and all the things that Section 106 used to that you can directly say this has been spent back in that area. If boroughs are facing this level of growth there should be more emphasis on getting some value, to make contributions to wider infrastructure as well in the borough, if this level of growth --

Nicky Gavron AM (Chair): From small sites?

Dr Riëtte Oosthuizen (Partner, Planning, HTA): Yes.

Heather Cheesbrough (Director of Planning and Strategic Transport, LB of Croydon): You can get that from Community Infrastructure Levy (CIL). You can apply CIL to small sites.

Dr Riëtte Oosthuizen (Partner, Planning, HTA): But can local communities see the impact? I think that is the --

Nicky Gavron AM (Chair): Will that not be a burden on some of these rather smaller developers?

Heather Cheesbrough (Director of Planning and Strategic Transport, LB of Croydon): It all comes down to viability then. You will get your CIL from the smaller sites but the work we have done around viability of smaller sites is there is an issue there, which is why we are not demanding affordable housing is provided on those sites. What will be good is to get a financial contribution, because developments of one to nine at the moment they have to pay CIL and we think from doing some viability work that for between about nine to about 15 units that is a real tricky area to try to make work because suddenly you get, by affordable housing, carbon zero, a whole range of other things, because it becomes a major application and so there is a real issue about how do you make that sized site work. You can probably do something below nine and you can

probably do something around about 20, but it is those sites in the middle, which are quite difficult. That is where, if you can do site assembly and bring a number of different parcels together, that might make those more viable.

Nicky Gavron AM (Chair): Any other points? There are a lot of questions here, are there not, from the inspector?

Reece Harris (Assistant Scrutiny Manager): Yes.

Nicky Gavron AM (Chair): There are many questions on this particular issue. Any you think that are gaps?

Reece Harris (Scrutiny Manager): Not that I can think of, off the top of my head, reading these.

Nicky Gavron AM (Chair): It is really what help the Mayor can give through the London Plan and also outside the London Plan in accelerating deliverability, which you have all said is an issue, and often because it is very resource-intensive or there are barriers with objections and so on.

David Scourfield (Chief Planning Officer, LB of Ealing): Certainly, specifically on the small sites methodology, the current approach is entirely capacity based, so it is based on estimating there is a certain physical capacity. It is kind of hinted at in question (b), which talks about how realistic it would be to achieve the target. But there is another component to it, which is what delivery mechanism does the policy provide, because at the moment it looks solely as if there is a policy ethic, if you like, which is to encourage these sites, but by identified delivery mechanism exists to provide - well to triple in Ealing's case - the amount of housing coming forward from small sites.

Nicky Gavron AM (Chair): How would you answer that question yourself? If you were asked what would you want as delivery mechanisms? What would you say?

David Scourfield (Chief Planning Officer, LB of Ealing): There would have to be a strategy around asking the question first of all, what is the obstacle? So, if officers at the GLA, for example, had identified a huge backlog of permissions, which were currently being refused, that is a potential area where a policy approach would work. However, if that does not exist it suggests you need an approach to encourage development to come forward along the line of what Heather was talking about in terms of area character assessments and something more constructive than just saying this is a target and there is a presumption in favour of it, but we are currently not receiving applications for those types of units. That is very unlikely to achieve anything by itself.

Nicky Gavron AM (Chair): Interesting. But the way, there is a section that talks about how you have to do evaluations, growth capacity, character assessments, tall buildings, there are about six different things that you are being asked to do.

David Scourfield (Chief Planning Officer, LB of Ealing): That is right, but it does not relate specifically to strategies, which could help achieve small sites better.

Nicky Gavron AM (Chair): That is a good point.

Neil Sinden (Director, Campaign to Protect Rural England London): This certainly will not be straightforward but it comes back to a point I made earlier about the need for institutional capacity to help

deliver on the ground and whether or not there is the scope for the Mayor or the GLA to set up some kind of unit within City Hall or the London Land Commission, or something, which is focused on promoting best practice and providing tools for authorities to learn from the strategic approach. That can be rolled out. Coming back to the neighbourhood point and the community point, I do genuinely think there is capacity, certainly in those areas in outer London where people are very concerned about the potential loss of green space to development where they are themselves beginning to ask, "What are the alternatives?" They are often communities that are very willing to go out and tramp the streets and look at underused vacant land. It has been a very strong focus in the discussion on getting small sites out of residential areas; there is a vast capacity in often disused garages, I think low-density single-storey high streets in some of the outer London areas where you could get employment gains as well as residential gains on the back of a small-site focus.

Nicky Gavron AM (Chair): It does of course include raising the levels.

Neil Sinden (Director, Campaign to Protect Rural England London): Absolutely raising the levels to two or three storeys, they do not have to be tall buildings. Serviced car parks, the revolution that is happening and has been happening over the last 10 years in retail will no doubt continue. It presents all sorts of interesting opportunities for a strategic approach.

Nicky Gavron AM (Chair): While we are talking about it, I just want to add in that I do think modular housing, factory-built homes, is very good for difficult sites and it also can go over utilities, it has very shallow foundations, so some of those complicated sites would lend themselves to factory-built homes and that means you do not get the noise and the dust and so on, it just slots in. It may work for small sites. Riëtte, do you want to say anything about what question we might ask?

Dr Riëtte Oosthuizen (Partner, Planning, HTA): Something I was just wondering about is the GLA commissioned consultants to do several workstreams on the new Housing Design Supplementary Planning Guidance. There were two workstreams specifically that are to be brought forward for the Examination in Public and one of them would have been about guidance and small sites delivery, so guidance on design codes, but also partly how you would assess infrastructure needs and capacity. Some of these questions being posed, consultants have been appointed to bring forward two workstreams to look at those and I do not know whether this will suddenly appear in the Examination in Public process or whether it has already been published, those two specific workstreams, but that was always the idea about it.

Nicky Gavron AM (Chair): I am sure it will be used, even if it is not published, it will be used as part of what the Mayor is going to bring forward to help boroughs. Unless others have ideas for questions we can ask or resources they would like to have, I think we will close.

Robin Brown (Hayes and Harlington Community Development Forum): Just the questions, whether or not it was probing, whether the policy will result in the creation of community-led housing, housing by small builders and self-build housing --

Nicky Gavron AM (Chair): I think that is mentioned somewhere.

Robin Brown (Hayes and Harlington Community Development Forum): It is the general support for bringing forward community-led development and David referred to this earlier on as one of the tools and I did not think it was sufficiently explored within the question.

Navin Shah AM: We picked up issues about the capacity in terms of local small business and Heather talked about how the developers are sort of on their own approaching residents and so on. That bit was taken up, other aspects that you mentioned, however that is something that if you have any comments you can write to the Committee - and this applies to everyone - if that will be either missed out or to add on what has been deliberated today. So that is something we will definitely welcome.

Nicky Gavron AM (Chair): What you are saying is that these sites lend themselves to community-led housing?

Robin Brown (Hayes and Harlington Community Development Forum): Yes.

Neil Sinden (Director, Campaign to Protect Rural England) There is growing Government support, financial support, for community-led housing schemes but I do not know how this is spent in London.

Nicky Gavron AM (Chair): There is something, maybe not under this, but it is very favourable towards community-led housing, the London Plan.

Robin Brown (Hayes and Harlington Community Development Forum): It is making the linkage, I think.

Nicky Gavron AM (Chair): Making the linkage is important. I was trying to make the link to modular, or I did make the link to modular, but I think we should make the link to community-led housing as well.

Robin Brown (Hayes and Harlington Community Development Forum): It does refer to neighbourhood planning, which is a possible way of delivering on small sites.

Nicky Gavron AM (Chair): Getting local acceptance.

Robin Brown (Hayes and Harlington Community Development Forum): The support by the GLA for neighbourhood planning in those areas that are devoid of people with skill-sets and attitudes to do neighbourhood planning in more vulnerable communities; that is missing.

Nicky Gavron AM (Chair): I think that is a really, really good point. We have raised it. The Assembly has raised it in our response that the Mayor needs to resource. It is not just leaving it to the boroughs; it is helping facilitate certain communities and being able to move forward on neighbourhood plans because, on the whole, they need expertise.

Navin Shah AM: That is something very important, very relevant, because when you look at planning applications for the smaller site developments there are a lot of local concerns or response. That is something not quite captured and I think it is critical in terms of engaging with local residents, local communities, how best it is done proactively for smaller sites as well as important as big projects, something I think needs to be captured.

Nicky Gavron AM (Chair): That is a good point.

Navin Shah AM: Community engagement aspects.

Nicky Gavron AM (Chair): Yes. That has been ever so helpful, and also those points at the beginning about looking more flexibly at the balance of the way housing is delivered under the target were very helpful too. I thank you all very much.