

London Assembly Planning Committee – 9 October 2018

Transcript of Item 5 - The Draft London Plan and Housing in Outer London

Nicky Gavron AM (Chair): If we can allow our guests to introduce themselves, just say a couple of lines about what you do so we know who you are, what you do, and who you work for.

Neil Sinden (Director, Campaign to Protect Rural England London): My name is Neil Sinden. I am the Director of the London branch of the Campaign to Protect Rural England (CPRE). You may ask what we are doing here? But of course, we have a very strong interest in how we can make better use of urban land in order to reduce pressure, particularly for housing development in green spaces, both within and outside of London. Indeed, the objective of making much better use of wasted space - including through focusing on small sites in outer London - was one of our top five priority areas for the London Plan that we issued a few months before the draft was published. We are pleased to see the small sites policies in the plan, but we also recognise, particularly having spoken to colleagues from Bexley, what a huge challenge it is going to be to achieve what we think is a very progressive, positive agenda.

Robin Brown (Hayes and Harlington Community Development Forum): I am Robin Brown. I am from the Hayes Community Development Forum - that is Hayes just north of Heathrow - as a community network trying to progress local projects. I am also part of a London-wide network, Just Space, which is a self-help group, or network, that participates in the planning of London, particularly at the strategic level, and we will be appearing at the forthcoming Examination in Public [of the draft London Plan] on a great many matters.

David Scourfield (Chief Planning Officer, London Borough (LB) of Ealing): David Scourfield, Chief Planning Officer for the London Borough of Ealing. Essentially, my job is to get development on the ground and that is what Ealing has been doing for a number of years and we will continue to do that. I manage the Development Team that looks after all of the applications - 6,000 plus - and also the Spatial Policy Team, which obviously has an eye on policies that we are putting forward that also the draft London Plan is putting forward. I look forward to the debate with interest as to how we can close the gap between the reality on the ground and the numbers being proposed.

Sam Cuthbert (Principal Strategic Policy Planner, LB of Ealing): Sam Cuthbert. I work in the Local Plans Team at the London Borough of Ealing.

Jane Richardson (Assistant Chief Executive Growth and Regeneration, LB of Bexley): I am Jane Richardson. I am Assistant Chief Executive at the London Borough of Bexley. Within my particular area come the planners, regeneration, economic development and the skills agenda. Along with the colleague to my right, last December [2017] the London Borough of Bexley published a very challenging and exciting growth strategy. In that growth strategy, we set out our plans to provide up to 31,000 new homes for London, all evidence based, all predicated on long-term work with the Greater London Authority (GLA). We believe that is the future offer of outer London to provide the homes that London needs in well planned places, and we are strongly opposed to being given an eightfold increase --

Nicky Gavron AM (Chair): We will get on to that, Jane. This is just introducing yourselves.

Seb Salom (Head of Strategic Planning and Growth, LB of Bexley): I am Seb Salom. I am the London Borough of Bexley's Head of Strategic Planning and Growth, so I head up the Local Planning Team.

Heather Cheesbrough (Director of Planning and Strategic Transport, LB of Croydon): Good afternoon. I am Heather Cheesbrough from the London Borough of Croydon. I am the Director of Planning and Strategic Transport. Croydon is extremely pro-growth, pro-development with a huge programme of regeneration underway. We are also very happy to be able to undertake the intensification and we are putting into practice many of, I suppose, the GLA and the Government's thinking on intensification: what it actually means and how it happens, so I am delighted to be asked to this meeting because we actually live it every single week at Planning Committee.

Dr Riëtte Oosthuizen (Partner, Planning, HTA Design LLP): I am Riëtte Oosthuizen. I am Planning Partner at HTA [Design LLP], a multi-disciplinary design consultancy specialising in housing delivery. We have 50 years of delivering homes. My team has specific expertise in working with a number of London boroughs on small sites. We have been delivering small, challenging sites for well over eight years with boroughs that want to increase affordable housing delivery. HTA is also known for having done some work around a super suburbia, which is looking at the capacity within outer London boroughs to intensify. I have to absolutely stress that we are departing from a point of view that it needs to be set within a well-developed framework of how we want to see growth develop - exactly like Croydon are doing at the moment - but we can talk more about the specific incentives that we think need to be associated with it.

Nicky Gavron AM (Chair): Thank you all for that. Just a couple of opening questions from me and then other Members will come in and we will drill down on the detail, so do not feel you have to flesh it all out now. I want to ask each of you how you view these challenging targets. We all recognise that inner London has been accommodating most of the growing population and the shift in the London Plan is towards outer London, but it is a steep increase in the targets and I am just wondering how you look at those targets, how you feel about their deliverability and how they can be delivered?

David Scourfield (Chief Planning Officer, LB of Ealing): Yes, as I say, Ealing, like Croydon, has been very pro-development for a long time and we continue to be so. From a personal point of view - and probably from a borough point of view - the overall target is challenging. Whether it is achievable or not is a combination of factors in terms of, obviously, the land availability but also the reality of what happens in the market. If the market enters an economic downturn - and depending on the Brexit scenario - we might be in a completely different market environment, so that needs to be taken into account, but we will certainly strive to achieve the uplift in the overall target.

Like other boroughs - and certainly other outer London boroughs - our concern lies with the balance between the small sites target and the overall target. We feel on several grounds that the small site target will be unachievable, from both an evidence-base and also from the point of view that it is not really justified in the overall scheme of that complete housing target. Therefore, we would probably like some more flexibility in terms of how the small sites quota fits within our overall target and, indeed, some further reassessment on how the mechanism works and what is being looked at.

Nicky Gavron AM (Chair): That is useful. We can probe on a lot of that, so flexibility between the two targets?

David Scourfield (Chief Planning Officer, LB of Ealing): Yes.

Nicky Gavron AM (Chair): OK that is interesting.

Heather Cheesbrough (Director of Planning and Strategic Transport, LB of Croydon): We currently have a 1,600 per annum target, which we adopted from the Local Plan in February of this year [2018], so that was an increase. Our new annual target would be 2,949 per year, which is quite a significant increase. We have done quite a bit of work on whether we can actually deliver that. At the moment, of the approximately 33,000 homes we have to provide through our Local Plan over the next 20 years, approximately 10,000 used to come from windfall, which, looking at historic rates, we felt was pretty punchy.

To help us do that we have put together a Supplementary Planning Document (SPD) 2 on intensification on small sites to actively encourage boroughs to do it. That is why we are doing a lot of this at the moment. Looking at what that is actually bringing forward, that is still not going to hit that target and it is certainly not going to meet the new target. Therefore, we did a quick bit of work about what it would mean because our intensification comes a lot from knocking down one big detached house on a large plot and putting up nine flats and, yes, that increases your numbers --

Nicky Gavron AM (Chair): That already happens then?

Heather Cheesbrough (Director of Planning and Strategic Transport, LB of Croydon): That is already happening and it is increasing at a pace, especially with the SPD2 that we brought in, and our Local Plan has a specific policy that says, "We encourage more small site intensification, including the redevelopment of back gardens", so we are out front upfront saying that we are doing it. We do have specific developers in Croydon who operate that small sites delivery model. We work with them through pre-applications and --

Nicky Gavron AM (Chair): You are already permissive in [respect of] building on back gardens?

Heather Cheesbrough (Director of Planning and Strategic Transport, LB of Croydon): Yes, we are. Our Local Plan allows it in certain circumstances. There is quite specific guidance about it because we do want to ensure that there are still gardens left for the host property and for the new property.

We do allow all of that but what we worked out is, with the new London Plan target, effectively, we would have to redevelop approximately 40% of our detached, semi-detached and some terraced housing to meet that target through the new London Plan target of intensification. Therefore, over the next 20 years, 40% of our borough would have to be redeveloped.

Nicky Gavron AM (Chair): Twenty years?

Heather Cheesbrough (Director of Planning and Strategic Transport, LB of Croydon): Yes, 20 years. We do not think that is possible or desirable because there is obviously a desire to keep the character of the borough, so what we are trying to do is intensification and redevelopment, working with the character of the place. That is not to say that the character stays the same. We recognise that some places will stay the same if it is in conservation areas or local heritage areas. There are some areas that we are quite happy to see change, because they are a mixed character and they will evolve - those are areas in suburbs that have no special designation - and then there will be some that change. For instance, in the town centre of Croydon an awful lot of that is changing.

Therefore, we do understand how our borough is made up and we have done a lot of character work around it but, in terms of deliverability of the target, we do question the sheer quantum of redevelopment of the borough that the new housing target will bring. We think that, at the very least, we would have to do an awful

lot of proactive site assembly, which we are not against, but we will need funds to do that. We also need the infrastructure, absolutely fundamental.

Nicky Gavron AM (Chair): We will come on to a lot of these points later. Heather, what we are hearing from Ealing is flexibility between the overall target and the small sites, which is a large proportion of the overall, so some flexibility about where you put your priority and how you rebalance the numbers. Are you saying that the overall target is too much? It is not to do with the small sites target.

Heather Cheesbrough (Director of Planning and Strategic Transport, LB of Croydon): That target is extremely challenging because we are already pushing the numbers on our allocated sites and our big sites. We have an Opportunity Area Planning Framework in the centre area, which are tall buildings. In the time I have been at Croydon that number has grown from about 7,000 to 10,500. They are in our big sites in our town centre, so we are already pushing those sites and we are looking at our district centres. We are pushing them harder, but we are already redeveloping sites further than the London Plan policy is asking in terms of small sites. It talks about 800 metres Public Transport Accessibility Level (PTAL) 3 to 6.

We are already doing small site intensification where PTALs are 1B, so it is a very difficult target to deliver. That is not to say we are not up for it, and it would be great if we can get some assistance in terms of infrastructure, better trams and better buses, but it is going to be really, really tough.

Nicky Gavron AM (Chair): Fine, you have covered a lot.

Jane Richardson (Assistant Chief Executive Growth and Regeneration, LB of Bexley): Having taken too much time already I will be quick. I would like to echo points that have already been made by some of my colleagues around flexibility and with densification. I should say we also have a permissive policy in Bexley, so we are not anti-growth, *per se*, and over half of the small site schemes that come forward get approved. There is a challenge about the market itself or the market response and there is a big challenge around infrastructure, so for example just looking at some of our friends and neighbours.

For Bexley, within our town centres PTAL ratings are 3 at best within 100 metres of our railway stations - we have no Tube or metro or tram - PTAL falls very quickly away from 3 to 1 within 100 metres. On a good day we have around eight trains per hour, morning peak. If you compare that to our colleagues in Lewisham and Wandsworth 42, Barking and Dagenham 37 and so on, we have to make the very big plea that it is around infrastructure investment to enable the kind of scale of shift in development. It is absolutely fundamental, and that is why our Growth Strategy talks about very significant growth in the north of our borough predicated on extending Crossrail from Abbey Wood across the north.

The idea that we can shift from where we are providing 120 homes per annum to 860 per annum, with no further investment, no further infrastructure in a borough that does not have wasted space but - similar to Croydon - would rely on demolition of the semidetached heartlands of London suburbia is an extraordinary challenge. Not least, it assumes that the people living in those homes would be happy to be displaced.

Nicky Gavron AM (Chair): Riëtte, do you want to come in here, because you have done work on what would happen if semidetached homes were to be demolished?

Dr Riëtte Oosthuizen (Partner, Planning, HTA Design LLP): There are a number of points that come to mind. I completely agree with the boroughs in the way that they say that some of these targets and the fundamental implications with the extent of the target could be problematic. Where we started with our work - and this was probably about five, six, seven years ago - was that we had to think about different scenarios of

how London can grow. If you start looking at it might not be the best way to use the green belt or metropolitan open land, then it is worthwhile to recognise that there is capacity. This capacity is in London's suburban areas where densities averages around 22 to 23 dwellings per hectare. This is not a sustainable density, so doubling the density is more sustainable density, so there is potential.

We have done several pieces of research and you can approach it in various different ways. There are specific types of suburban homes and this is not covering all types of suburban homes. We started our *Supurbia* work of semidetached homes, a plot of 8 by 40 metres, where, with very specific design coding and looking at planning tools such as Local Development Orders [and Plot Passports], you can create capacity potentially for an additional home. You can also create additional equity for the person owning that property without necessarily affecting character.

Character is the second point. It is really important. The problem that we have had in actually trying to bring forward a number of small sites that boroughs themselves wanted to build is that character was interpreted differently in each single borough and it is not clear. There are no clear rules about what actually affects character and what character is. In one planning appeal for a really clever design, the question of character came down to the question of a plot that needed to have a front and a back garden to actually exemplify suburban character, and I do not think that is necessarily accurate. We do have to think about what suburban character is for the future of London to accommodate its growth.

With the new National Planning Policy Framework (NPPF) and the new London Plan there is an awful lot of responsibility placed on local authorities to actually be very proactive in terms of design guiding [to encourage infill development]. We all need to think about how boroughs need to be supported. There is a lot of misunderstanding about what design coding is. There are other planning tools that could be used. It is quite clear that there is a resource implication about managing this level of growth appropriately.

I completely agree that, if we are looking at this level of growth, we do need to think about either capturing value or setting in place ways of addressing social and other infrastructure needs at the same time, so that is just a few points.

Nicky Gavron AM (Chair): They are good points and we will come back to some of those points in later questions, especially the tools that boroughs need: the area design code and other tools that they need for this. Robin Brown or Neil Sinden, do you want to come in on this?

Neil Sinden (Director, Campaign to Protect Rural England London): What I have heard is that there is a general level of support for the kind of direction of thinking that is embodied in the draft London Plan in terms of the need to reshape and remodel outer London boroughs, but there are some very serious, practical challenges in seeking to realise that ambition.

Having heard what Riëtte just said as well, my thought is that we need more than a policy in the London Plan and willing and able outer London boroughs to deliver what is quite a radical reshaping of a large part of London's surface area if that the ambition is to be realised. I am just wondering how can organisations like CPRE, which is a relatively small campaigning non-governmental organisation, help by way of seeking to influence national Government in terms of national planning policies? I am very conscious that until not long ago we had policies in national planning guidance around the phasing of land release in order to encourage brownfield wasted spaces to be used first. We do not have an approach to phasing anymore, and I am wondering if a national policy support for that kind of approach is worth revisiting?

Nicky Gavron AM (Chair): We are going to ask people for their ideas.

Neil Sinden (Director, Campaign to Protect Rural England London): One of the things we called for in our manifesto for the London Plan was the establishment by the GLA - with the support of others - of an urban land commission where we can share and examine and probe the kind of evidence that Riëtte talked about, which has come through from the work of HTA. There are also other sources as well. The work done by the Urban Taskforce in the 1990s is well worth revisiting in terms of urban capacity. This does present an opportunity to think about institutional capacity to deliver but it could be quite a significant challenge for London. I would also emphasise that I do not think that, while we strongly support policies in the London Plan to make better use of land within London, the core GG2 policy [about making the best use of land] is a very important one. It is not only important for how we use land in London, and how we can safeguard green space as well as making better use of existing developed land, it is vitally important for tackling issues like climate change, air pollution and meeting transport needs sustainability. We need to recognise that the radical agenda that Transport for London (TfL) is promoting - to have 80% of journeys made by active, sustainable travel roads by 2041 aligns with the policies for making better use of small sites in the draft London Plan.

Robin Brown (Hayes and Harlington Community Development Forum): I am not actually a spokesperson for the London Borough of Hillingdon, but the good people of Hayes do share some of the concerns of the council. The housing target is particularly challenging. It is tripling the actual gross out target compared to the 2015 London Plan. Half of that, new target is expected to be delivered from small sites, but over the past eight years the actual small site delivery has been quite small and it would mean a quadrupling of the output from small sites in order to achieve what the GLA is expecting. For us that is particularly perplexing and challenging, and there are ramifications or implications from the special designations of using PTAL 3 to 6 in addition to the 800 metres of town centre boundary, because the PTAL 3 to 6 includes --

Nicky Gavron AM (Chair): Does everyone know what PTAL is? Public Transport Accessibility Level, just in case people watching and listening do not know.

Robin Brown (Hayes and Harlington Community Development Forum): Areas of reasonably good public transport accessibility, so we have a major high street - Uxbridge Road - and there is a good deal of employment located on the frontage and behind the frontage of Uxbridge Road. Those will be at risk. The GLA's own commissioned document - *High Streets for All* - says that 70% of high streets within Greater London are under potential threat because they do not have any safeguarding designations. That is, they are outside town centres. These high streets are particularly important because 47% of businesses outside Central London are located in a high street, so I wanted to flag up the vulnerability of high streets to the small sites policy.

Nicky Gavron AM (Chair): We have made representations on this and there is an amendment and those kinds of buildings are not going to be seen as small sites. They are much more under threat by the way from the Government's permitted development rights. Although we have lobbied we cannot do much about that. You said many things that are interesting, but one in particular was the fact that you have had a very low take-up of development on small sites in the past. That is probably true of most around the table, maybe not, but do say if that is not true, when you come onto the next question. We now have a presumption in favour of development on small sites - that includes conversions as well as new build - which should make a difference, but one thing we want to explore is what the barriers are then? Is presumption enough and what are the other barriers? Robin, did you want to come in?

Robin Brown (Hayes and Harlington Community Development Forum): Yes, I just want to respond to your point about the minor modifications. My reading of the minor modification is it was for designated industrial or employment sites, and the point I am trying to make is it is these are not designated.

Nicky Gavron AM (Chair): No, no no.

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

Nicky Gavron AM (Chair): Non-designated has been deliberately removed from being small sites. I am not dreaming that. I am pretty sure that is true. Reece will check up.

Robin Brown (Hayes and Harlington Community Development Forum): I got it at F7.

Reece Harris (Assistant Scrutiny Manager): Yes, it is designated industrial or employment sites.

Nicky Gavron AM (Chair): That is different though. These are these are little high streets we are talking about. We will come back to you on that if I have it wrong, because we did make representations and I swear I read that it had been changed. Can I ask Jane Richardson, Bexley, to talk a bit about the small sites? How are they going to look on the ground? What are you thinking of in terms of the development of small sites?

Jane Richardson (Assistant Chief Executive Growth and Regeneration, LB of Bexley): What it is going to look like on the ground is very difficult. As I said before, I would commend our Growth Strategy as our strategy rather than small sites. What we see in Bexley is there are very few infill sites, so what tends to come forward are corner plots on residential roads, the conversion of small dwelling houses. Unfortunately, we did have to take out an Article 4 Direction around some of the conversions we are seeing in our housing stock, because there was a level of exploitation going on of vulnerable households. They are very small scale. They are usually two, four, six, and eight. They very rarely trigger any affordable housing within the small sites that come forward in Bexley. Without investment in infrastructure that is very likely to be the case because the market simply is not there for a big return for developers, so I would imagine it will just be more of more of the same. We will continue in actuality to provide 100, 150, 200 units per annum. We will never get anywhere near 860. It is absolutely impossible.

Nicky Gavron AM (Chair): Can I ask you: you have quite large development sites in Bexley, could you be getting more from those?

Jane Richardson (Assistant Chief Executive Growth and Regeneration, LB of Bexley): I commend our Growth Strategy to you. I keep saying this. Mr Salom and colleagues and I are on some very encouraging pre-application discussions with a number of developers - who would not have even bought in our borough before the Growth Strategy was published - and we are moving much more into that Growth Strategy territory. To really drive forward we do need a transport infrastructure. The developers will talk about this again and again.

Our land values are generally the lowest in London. We tend to swap places every other data set release with Barking and Dagenham, but they tend to be the lowest in London and I will come back to one of the statistics around connectivity. We have eight trains an hour, morning peak, and they have 37. It is just the market. It is just the nature of the place. We do have some large-scale developments. We have the biggest housing zone in London, which was delayed because we had to go to public inquiry where the inspector found in favour of us in full so that will be progressing imminently. Part of its charm, of course, is it is in Abbey Wood and what does Abbey Wood have? Abbey Wood has a Crossrail station. Therefore, it really is something around the nature of the place. Listening to my colleague talking about the character and design, well, outer London is not one homogeneous bit of a doughnut. We are all different and we do have different markets. We are not anti-growth - read the Growth Strategy - but we are realist and we do have genuine concerns that we will not

meet these targets and then we will be losing our appeal because we are simply not meeting a number that is utterly impossible.

Nicky Gavron AM (Chair): You are talking there about small sites.

Jane Richardson (Assistant Chief Executive Growth and Regeneration, LB of Bexley): Yes.

Nicky Gavron AM (Chair): Because of the target you think you will get more appeals?

Jane Richardson (Assistant Chief Executive Growth and Regeneration, LB of Bexley): That is pretty inevitable that we will get more appeals because we simply will not be able to deliver an eightfold increase in small sites. They just do not exist. They simply are not there. The large sites, that is fantastic. We are delighted that the Mayor did not call in a large mixed use scheme in Bexleyheath. Although Bexleyheath is our major town centre it is at least a mile and a half from the railway station. Nevertheless, we are thrilled with that and we think that starts to show a step change, so we really are up for it - broken record - we need support with the infrastructure, but small sites are not the way forward.

Nicky Gavron AM (Chair): Ealing, could I ask you because you talked about rebalancing? I do not quite know how you meant it but, basically, if there were fewer in the small sites or was it just the target that is a problem?

David Scourfield (Chief Planning Officer, LB of Ealing): It was rebalancing in terms of applying the target to both the overall numbers and also explicitly to small sites, because there is a feeling that - as with other boroughs - if you really are pro-growth and, if you at the end of your year, or at the end of the period, are somehow achieving that very challenging overall target but you are not achieving the sub-target for small sites, then why should you be challenged or penalised on that particular element of it when you are providing the housing as such? The flexibility is perhaps to look at if you are going to keep a challenging target you keep the challenging target, but you do not penalise authorities for not meeting that target explicitly by a sub-target for small sites of itself because we are hearing that that is very difficult.

Nicky Gavron AM (Chair): This is really interesting. What Bexley just said about appeals, if you have a target for small sites does that mean that you are likely to get appeals on small sites?

David Scourfield (Chief Planning Officer, LB of Ealing): It is likely, whether you quantify this at this moment in time is difficult, but I just think the way the development management process works, the engagement with communities, the way councils may feel if more schemes are coming to committees and being overturned there is a likelihood of that. Constituents, particularly where there are heritage issues and conservation issues, will be more proactive in resisting development and, therefore, it is likely that the appeal system will come into use more and more. With a presumption in favour of small sites, it is likely that more and more will be allowed on appeal so it --

Nicky Gavron AM (Chair): I am interested because there are two things. There is a presumption and there is a target and if the overall target were - I do not know how you would change it - not there would you still get the same level of appeals because you have a presumption?

David Scourfield (Chief Planning Officer, LB of Ealing): It is likely. It is not so much striving for that particular target, because one would hope that at the end of the day any scheme - whether it is a large scheme or a small scheme - is going to be decided by Local Plan policies across a spectrum of Local Plan policy and

obviously with consideration of engagement with the local community, but there will be increased tension there with the local community and their councillors and it is likely that that would drive up the appeal rate.

Nicky Gavron AM (Chair): That's interesting. On the other related point, you are pro-growth, but you would be arguing for flexibility in terms of where you put your growth in terms of if it is on bigger sites - as could be the case in Bexley if they had the transport infrastructure - or whether they can reach this target on small sites?

David Scourfield (Chief Planning Officer, LB of Ealing): Absolutely, and the message from all of us, I guess, is the overall target and let us not forget this is going to be extremely challenging for most.

Nicky Gavron AM (Chair): Yes, although the overall target is also challenging.

David Scourfield (Chief Planning Officer, LB of Ealing): Yes, absolutely.

Nicky Gavron AM (Chair): But you still want that flexibility?

David Scourfield (Chief Planning Officer, LB of Ealing): Yes.

Nicky Gavron AM (Chair): Is that true of Croydon?

Heather Cheesbrough (Director of Planning and Strategic Transport, LB of Croydon): A couple of things, talking about appeals and stuff like that, what we are concerned about, in terms of the overall target, is that we will not be able to provide the land supply and then what happens is you can end up in an appeal situation and the inspector will be falling back to NPPF - the presumption in favour of sustainable development. Therefore, that is our concern that we just cannot show the five-year land supply and I should imagine there are a lot of other London boroughs that will be in exactly the same position. That needs to be thought about.

Nicky Gavron AM (Chair): Can I just say that this plan - the Mayor has been written to by the Secretary of State [The Rt Hon James Brokenshire MP]- is not being judged by the new NPPF.

Heather Cheesbrough (Director of Planning and Strategic Transport, LB of Croydon): Right, but that was in the old NPPF and the new NPPF. You still have this presumption in favour of sustainable development and there is the housing disorder attached.

Nicky Gavron AM (Chair): Yes, I was just thinking about the five years.

Heather Cheesbrough (Director of Planning and Strategic Transport, LB of Croydon): Yes. You have to show you have a five-year land supply, and if you have these big targets you cannot necessarily show that and that is when you could end up losing that appeal, so that needs to be considered: is planning going to carry on in London if we basically throw all Local Plans and policy out the window because it comes down to the NPPF presumption in favour of sustainable development? Because that is what could happen. There is that issue and we would say that we would much prefer the Liverpool method to be taken on board because initially, specifically with these small sites, it is going to be very difficult to gear up small, medium-sized developers to get that sort of mindset, and members of the community and political members as well and officers to get into the mindset of delivering small sites. It is going to take time to step up to this housing target. You are not going to deliver the numbers in the early years. You might be able to get into the swing of it later on and deliver more in the end, so the Liverpool method would be better.

Just talking about appeals, we have done a huge amount of work to ensure we have the most efficient system we can have and we worked at getting roughly about 30 appeals each month down to about eight. That is good. We are pleased with that, and that has helped because we have a new Local Plan and it has also helped because we have specific guidance now on how you take forward small sites and intensification, so all the officers and developers know that there is much clearer advice out there on how to take forward smaller sites. At the same time, we are now having far more Planning Committees and it is absolutely exhausting. We used to have one every two weeks. We are now having one every week because of the sheer quantum of referrals and schemes that are objected to. These are not big schemes, so you might have 250 objections to a scheme, which is like eight or nine flats, and you sit in Committee and you have loads of objectors getting up there, loads of Board Members coming in objecting. Effectively, the scheme goes through at the end of the day, but it is a huge resource and it is killing the department because we have to be geared up for Planning Committee every single week and it is not sustainable to be doing that.

We have a very supportive administration. We have a Local Plan that sets out the right policy and we have the right sort of supplemental planning guidance that sets out the right policy, but the amount of time it is taking to get these small sites through needs to be factored in. They are not easy at all.

Nicky Gavron AM (Chair): OK, so it is resource-intensive, and you also think there should be a transition of some sort on this?

Heather Cheesbrough (Director of Planning and Strategic Transport, LB of Croydon): Yes.

Nicky Gavron AM (Chair): What would a transition mean?

Heather Cheesbrough (Director of Planning and Strategic Transport, London Borough of Croydon): Again, it comes down to being more flexible, so how is it going to be dealt with in terms of this five-year land supply issue, first of all, and then also if we are not meeting it every single year we have time to catch up at the end, and that is the Liverpool method of --

Nicky Gavron AM (Chair): Yes, so it might come back to your point about phasing the transition.

Heather Cheesbrough (Director of Planning and Strategic Transport, LB of Croydon): Yes.

Nicky Gavron AM (Chair): That is helpful.

Tony Devenish AM: Yes, I am asking Riëtte Oosthuizen and then other members: why do you think the Mayor now includes a modelling approach of calculating the need for small sites in the Strategic Housing Land Availability Assessment [SHLAA]

Dr Riëtte Oosthuizen (Partner, Planning, HTA Design LLP): I suppose it is just to get the sense of what capacity there is within London and there are various approaches you can do because there is no recognised modelling approach¹. Something that I wanted to add to the previous discussion that might add to this as well is I think there is a bit of a discrepancy between national level planning policy and what is being required by

The following comments were added by Dr Riëtte Oosthuizen (Partner, Planning, HTA Design LLP) after the meeting to add clarity to the transcript:

¹ Especially where human behaviour is concerned. We estimated that 50% of semi-detached suburban home owners may want to double the density on their properties over a 30-year period.

the London Plan of boroughs in terms of brownfield registers. The definition of what a small site is has changed. Brownfield registers apply to sites larger than 0.25 hectares.² We have done some research or CPRE to look at how boroughs identified small sites. We found that [aside from copying existing known sites within the SHLAA or HEELA] they do not do proactive work [to identify small sites] because it is just too difficult. There are lots of resource issues, for example, of how a planning policy officers relate to development control officers and how you estimate the capacity of different sites.³

Some of this discussion needs to distinguish that small sites are not all homogeneous either. There are small sites that are developed that can actually facilitate two, four and 10 homes. They are the sites that sit within the planning process that are really difficult to get through planning. It is more difficult to get those sites through planning than it is to get a 28-storey tower through planning, so we do need to recognise that.

Targets are clearly an issue, but we cannot just say that small sites are not coming forward because it is part of the solution. It is finding the best ways of making it not too challenging but actually starting to find proactive ways of promoting them.

Tony Devenish AM: Just to press a bit further on that, specifically what are the alternates or the improvements in a modern approach that you think could be made please?

Dr Riëtte Oosthuizen (Partner, Planning, HTA Design LLP): I do not think there is any way apart from local authorities going to look at their own areas⁴ Croydon, to an extent, have identified areas where they think there is capacity for further growth.

Tony Devenish AM: To give an example, I heard the Chief Executive of Croydon say this about her own sites. If she has a whole lot of public sector sites herself and she can manage them effectively that is perhaps one better way of doing it, but if they are all privately owned sites being developed by different developers there is no real way that you can actually manage this process, is there?

Dr Riëtte Oosthuizen (Partner, Planning, HTA Design LLP): You can, because the new London Plan and the NPPF - which is not going to apply to the new London Plan - require us to look at these sites with specific design coding or guidance in place so they need to develop a set of rules to assess these sites.

Tony Devenish AM: Has anybody actually done so? Of all the boroughs is one of you ahead of this?

Heather Cheesbrough (Director of Planning and Strategic Transport, LB of Croydon): I think we are. We have an SPD2 out on intensification and bringing small sites forward. That is out of consultation at the moment, and that is incredibly detailed in terms of: how do you take these small sites forward? It provides design solutions and it is detailing. It looks at, if you amalgamate plots, how do you deal with the tricky issues of overlooking? It deals with character. It goes into incredible detail and all those things to provide that additional guidance to developers and to our own officers as well. I am not a massive fan of design codes because you can put a huge amount of time into design codes and you still need to apply them, but a SPD with good guidance is a helpful way forward. I know the GLA is doing some work on that because I think it is really helpful to share good practice. We have learned a huge amount in terms of the couple years that we have been taking intensification forward. We also have our own housing development company, Brick by Brick, that took forward some really tricky sites because they were all council owned, things like garage forecourts and bits of left over land. It employed some really good young architects to come up with really

² Yet, the new NPPF defines small sites as one hectare.

³ There is no agreed methodology.

⁴ To understand and be clear on what type of intensification might be desirable and should be encouraged through planning tools.

good solutions and we have learned from that. We have really tested things like overlooking distances. We use the levels of our land. How do you deal with car parking, because if you knock down one house and put nine flats back there is a real issue about how much car parking goes in? How important it is to get the landscaping right? How do you deal with private and communal space, place space, so the SPD covers all those matters and is informed by real life solutions because it is happening right now in the borough?

Neil Sinden (Director, Campaign to Protect Rural England London): Could I just chip in just on the brownfield registers point? One of the things that CPRE is keen to do - and it has done so in the past, including outside of London, is to promote the requirement for authorities to prepare urban capacity studies. We want to encourage local authorities to carry out very thorough urban capacity studies. We have looked a little at some local areas, for example in Tower Hamlets, where we identified 12 small sites - including some very small sites, well below 0.25 hectares - which over the last 20 or so years have been developed within a radius of about one mile from the centre of one of the former Tower Hamlets neighbourhoods, delivering over 100 homes in the process. There are different ways in which you can go about [exploring the potential of small sites]. We are working with community groups on the ground in some outer London boroughs to see whether or not we can compile our own brownfield registers [or capacity studies]. We need to improve on the relative lack of activity for various reasons - I am sure quite legitimate - by some outer London boroughs to proactively use the brownfield registers at all as a tool for achieving the objective of [developing] small sites. I would be interested in local authorities' comments on that.

Tony Devenish AM: Bexley want to comment I think.

Seb Salom (Head of Strategic Planning and Growth, LB of Bexley): I want to comment on your original question, which is why we think the Mayor used the modelling approach. That is an important question and something we should dwell on for a little bit. Certainly, from our point of view at Bexley, we think it is a desperate attempt by the Mayor to bridge the gap between the objectively assessed needs figure that he has to deal with and the figures that were coming out of the SHLAA, because coming out the SHLAA often there is not enough large sites, nowhere near that, so it is quite a desperate attempt to find some way of bridging that gap given that there was no development in the green belt and also a move to protect employment land. That is an important point that we should take note of.

If you actually look at the SHLAA and the justification for that modelling approach, that modelling approach is essentially based on one figure of 1% annual increase in the amount of growth coming out of existing residential areas. How is that justified within the SHLAA methodology? It is a reasonable estimate in view of the impacts of the proposed policy. That is all it says to justify that figure. That needs to be challenged.

I want to pick up another point that was made by a colleague on the architects. We have a permissive policy in Bexley. We allow back land development when there is no harm. That is exactly what the draft London Plan says in its presumption in favour of small sites. If we were to approve every single application for small sites that came to us -- and we approve the majority but if we were to approve all of them we would have completed, since 2006, 192 units from small sites, not the 869 that we have in the London Plan. These targets are not achievable simply on the basis of a change in London Plan policy.

David Scourfield (Chief Planning Officer, LB of Ealing): It is a point that I was going to come on to, in terms of how we approach small sites and whatever the responses are at a planning policy level or, indeed, a supplementary planning guidance document level. Essentially, the planning system is laying the foundations down in a policy sense for allowing things to happen when that is a presumption in principle or an application of policy as has always been the case. The model that perhaps we need to look at is: how do we create a model of deliverability? We all have authorities where we are proactive with our own asset management on our

own estates, whether that is on the bigger sites or, indeed, the smaller sites through release, but how do we bridge that gap? That is exactly the discussion we had with HTA on *Supurbia*: how do we breach that gap as authorities with very little resource, let us face it, to encourage the type of community development that is not just looking at neighbourhood planning but neighbourhood development. Is it necessary to develop some extra reviews to give that expertise where you have one or two individuals in the neighbourhood that can see that there is intensification that could happen, but how do they go about getting that on the ground? Historically, they would come to the planning authority. The planning authority is not in a position anymore to develop hundreds of planning briefs - whatever they would mean - for hundreds of different small sites, nor is it able nowadays to give free advice to these communities so, therefore, where is that expertise? Where is that assistance going to come from? Indeed, is there any financial assistance in putting together a site? That is equally a challenge.

Nicky Gavron AM (Chair): Can we can we hold that about tools and the assistance because we have a question a bit later on, which I think Assembly Member Shah will be asking around? It is an important point that you raise: how can we bridge the gap?

Tom Copley AM: I will move us on to the 2017 London Strategic Housing Market Assessment (SHMA). As a Committee, we have certainly raised eyebrows looking at the size mix that was contained within the SHMA and the emphasis on smaller homes and particularly - I think it is 55% - one-bed flats. I will start with Heather Cheesbrough, and I am interested to hear what the other boroughs have to say about this as well: how does the 2017 SHMA reflect your experience on the locally assessed need for smaller homes compared with the previous SHMA's emphasis on larger homes?

Heather Cheesbrough (Director of Planning and Strategic Transport, LB of Croydon): I am just trying to think through our SHMA. The SHMA was saying that we need family homes in the borough. I think we have a 60% or 70% target in our Local Plan for all new homes to be three-beds or more. It is either 60% or 70% that is the requirement, so we have a real need for family homes.

Tom Copley AM: When was your last borough SHMA?

Heather Cheesbrough (Director of Planning and Strategic Transport, LB of Croydon): It is only in fact 2017; it is the most recent one.

Nicky Gavron AM (Chair): Is it the one you use in your responses to the London Plan?

Heather Cheesbrough (Director of Planning and Strategic Transport, LB of Croydon): Yes. There is a real need for family homes. We do seek that as a strategic target, but we know that we are not going to get anywhere near to that. We have a policy that seeks a range of typologies for all major sites, but for sites of one to nine [units] there is more flexibility within it. That is important because if you are bringing forward small sites, for instance, you need to have the ability to be flexible in terms of if you want to bring the whole site forward you have to trade something off effectively.

What we are finding is that sometimes small sites can deliver more family homes, which is what we need, because they do not want to go above nine because then they become a major [site] and have an affordable housing [requirement], they get all the other things that kick in, so they prefer to do - I do not know - two three-bed units and keep it below nine. I do think that the smaller sites can help contribute to us meeting our family housing target in a good way. Often, they are in more suburban locations and they have big gardens, so you can provide the outdoor amenity space as well and because they have got lower PTALs you do not want to have a lone one big flat bunged in there either, so that works out quite helpful for us.

Tom Copley AM: Across the board - not just small sites but in general - do the figures that are contained within table 4.3 of the [London] Plan based on the SHMA, do they look right to you? Do they feel right?

Heather Cheesbrough (Director of Planning and Strategic Transport, LB of Croydon): I think my recollection is that they are still above what we feel that we can do. We have done some work around it and we can probably get that figure, but the figure we have been given they do not match up from my recollection. You are probably asking me a really detailed question that my manager of planning policy would get involved in, so probably one of these experts down here would --

Nicky Gavron AM (Chair): We have planning policy managers here.

Tom Copley AM: I will move along to Bexley. I am particularly keen to hear whether or not you think the figures there are going to lead to an oversupply of smaller homes and not enough family homes.

Jane Richardson (Assistant Chief Executive Growth and Regeneration, LB of Bexley): I will defer to my expert here in a second but, yes, in essence. The demand in Bexley - and we have commissioned our own chart and it has been delayed because they got a bit tripped up with some General Data Protection Regulation issues - the early indications are that the ongoing trend is for larger family homes and it is also for extra care type facilities, so that is another topology because Bexley has an ageing population more distinct than other parts of London as well. We do not actually have one extra care scheme in Bexley, so there is another nuance there. Currently, we are potentially heading towards an oversupply of smaller units but, Seb, is there anything to add?

Seb Salom (Head of Strategic Planning and Growth, LB of Bexley): That is generally right, an oversupply of small units. Developers like to provide smaller units. They are easier to develop and where people are finding it hard to afford a house they tend to downsize anyway, so they do see that. There is also some perceived difficulty of designing in family accommodation to higher densities as well, particularly high rise. That is particularly challenging. There are ways of doing it, of course, but there does not seem to be the knowledge out there to be able to do it well.

Tom Copley AM: Also, whether or not high rises are suited anyway to family-sized housing which they probably are not. The draft London Plan prohibits you from setting size mix for market rent but it does say you should set a size mix for affordable local rented housing. I think it allows you to base that on your own SHMA. Is that correct? If you have conducted your own more up to date --

Seb Salom (Head of Strategic Planning and Growth, LB of Bexley): Interestingly the draft London Plan says you should not do your own.

Tom Copley AM: You should not?

Seb Salom (Head of Strategic Planning and Growth, LB of Bexley): No, if you are going to do it you should do it sub-regionally. You should not do it on your own, which we are not particularly happy with because, yes, we can do it sub-region but we also want to get an idea of our local need within the borough. There is a housing market there that we need to understand, and so we do think that we should be able to do our own one and we think we should be able to reflect the information that is coming out of there, including mixes for other sources of housing if so desired and required locally.

Tom Copley AM: Thank you. Ealing?

David Scourfield (Chief Planning Officer, London Borough of Ealing): Yes, we are taking the sub-regional approach and we are in the middle of looking at west London.

Tom Copley AM: Which boroughs are included in that?

David Scourfield (Chief Planning Officer, LB of Ealing): I will hand you over to Sam Cuthbert. I do not want to steal his thunder because he is the expert on this.

Sam Cuthbert (Principal Strategic Policy Planner, London Borough of Ealing): It is all the boroughs you would expect in west London plus also Barnet. They have come in as well as part of the west London alliance, so it is a sub-regional study. It will produce borough-specific outputs. I did not actually bring the borough figures. I brought the sub-regional figures and, yes, they do not reflect the London SHMA at all, so the draft figures that were completed according to what is now the current methodology - but Government has already announced that it intends to revise it - did not show a 55% requirement for one-beds. It showed a 17.5% requirement for one-beds and then the bulk of demand is actually in two or three-beds, so it is 40% for two-beds and 29% for three-beds.

Tom Copley AM: We are building a bit of a picture. We have heard much higher figures from other boroughs. We had a previous Committee meeting where Havering identified a need of 80% family-sized housing in in their SHMA, and it does seem counterintuitive to me that over the Plan period that the figures in there would mean 900,000 new one-bedroom flats being built in London.

Sam Cuthbert (Principal Strategic Policy Planner, LB of Ealing): There was a bit of analysis in the report, and certainly the consultant speculated that what it would effectively mean was that everybody in potential need of a one-bed, including those who either would not receive Housing Benefit or could not pay for it themselves, would have to take up a one-bedroom flat in order to occupy that total supply.

Dr Riëtte Oosthuizen (Partner, Planning, HTA Design LLP): The point that I would just like to add to that is that developers like to build one and two-bedroom flats because that is all they can sell at the moment [to the wider public for less than £600,000], so it is a question about affordability and it is a real shame that the new London Plan is not assessed according to the new NPPF, because the definition of affordable housing is a lot wider and discounted market sale, for example, is being included in there. There is a real issue around families who are trying to access housing products [at an affordable price]. The SHMA at the moment, at paragraph 8.9, seems to suggest that that need [for family accommodation] will be accommodated through downsizing, so I think there is an issue around the fact that boroughs cannot set a mix for private family homes. .

The other point is that just having a policy is not necessarily going to deliver those homes. We have done a little bit of research - and I do not have those figures here now - and I think we have looked at just one borough. If you look at the number of schemes that have gone through with the housing mix different from the policy mix, the largest schemes are far less likely to actually meet it. Whereas the smaller sites actually are more likely to accord to a housing mix applied policy. It is not as simple as just a policy would lead to behaviour. There is the affordability thing and new built homes and what they can sell it for.⁵

The following comment was added by Dr Riëtte Oosthuizen (Partner, Planning, HTA Design LLP) after the meeting to add clarity to the transcript:

⁵ Viability arguments play a huge role in this.

Tom Copley AM: That is right. I do understand the argument as well that that the GLA makes about not setting aside to market, which is two-thirds of family sized market sale homes are sold to private landlords. They are not actually occupied by families, so I do understand that but, of course, it does not mean they are always going to be owned by private landlords. Over the lifetime the market can change and families can move in. Does either of our other two guests want to contribute on this point before I finish the question of size mix?

Neil Sinden (Director, Campaign to Protect Rural England London): My point follows on from what Riëtte Oosthuizen said about affordability. Two points really: one is that the London SHMA clearly covers a very wide range of circumstances. I would imagine that the sub regional SHMAs will give you a better, more fine-grained approach to this issue. I would imagine that the huge preponderance of one-bed homes, indicated by the London SHMA, is largely related to needs in the inner London boroughs rather than outer London.

The other point I would make in terms of affordability is that the report of the Smith Institute [*Pricing Londoners in, not out*] on house prices in London, published a few years ago, was quite interesting on the ability of new housing in outer London to meet some of London's affordable housing needs just simply because of the huge disparity in average house prices between inner and outer London. [Average prices in] the most expensive boroughs were nine times that of the lowest priced boroughs. There is an issue here about looking at how new housing could be made to work harder in outer London boroughs in terms of tackling the affordability challenge.

Navin Shah AM: Thank you.

Nicky Gavron AM (Chair): Can I just ask do any boroughs have a surplus of one-bed flats at the moment or think they have got enough?

Neil Sinden (Director, Campaign to Protect Rural England London): I would want definition in terms of vacant flats or unpurchased ones?

Nicky Gavron AM (Chair): We have heard anecdotally that some boroughs say, "Look, we've got too many already" and I do not know quite what they mean by that, therefore, I am asking; more than they need or more than are being filled up? No?

Jane Richardson (Assistant Chief Executive Growth and Regeneration, LB of Bexley): I suspect we have people living in one-bedroom flats who should be living in larger properties.

Tom Copley AM: Overcrowded.

Jane Richardson (Assistant Chief Executive Growth and Regeneration, LB of Bexley): Overcrowded. Just as an aside, Bexley has seen very significant inward migration and we have had, over the last three to four years, the largest surge in applications for school places, for example. That is how, in part, I would measure that.

That has also given us a bit of an insight into how our private rented sector (PRS) stock is being used as well. It is far more common now that, in the PRS sector, you may have a family with two children living in a one-bedroom flat. I do not think we have voids. We do not have £800,000 one-bedroom flats in Bexley, for example. They tend to be more affordable. An awful lot do slip into the PRS and there is probably a significant level of overcrowding but because a lot of it is in the private sector, it is not that easy for us to tap

into. It is certainly not like areas in inner London boroughs where there are whole tower blocks and you can drive past at night and not see a light on.

Nicky Gavron AM (Chair): That is not the case for Ealing, say, you do not know? Overcrowded one-bed flats?

Sam Cuthbert (Principal Strategic Policy Planner, LB of Ealing): No. I think our rates are quite similar in that certainly we are not seeing voids of units, but occupancy of units is not necessarily the London Plan space standard requirement for those units. For instance, we will see people in private rental flats will be sharing it more than the room occupancy level that would be specified by the space standard.

Nicky Gavron AM (Chair): It does seem that if you build a very large number of one-bed flats and 16% two-bed and 29% family, then you are likely to see that a lot of target groups will either not be able to live in London or they will move into the one-beds and be overcrowded, maybe. Is that what you are saying?

Sam Cuthbert (Principal Strategic Policy Planner, LB of Ealing): Yes. Certainly, we are not seeing voids of tenants of one-beds either.

Navin Shah AM: Pretty much with one voice, all what our presenters have said is how challenging the targets are in terms of their delivery and no need for flexibility and whether assessment etc, makes it better. On the issue about those challenges, what will some of the challenges be that have been identified on appropriate small sites given the fact that already all of you are doing the work on small sites? Here there is pressure to find additional small sites at a very large scale. What are the challenges involving that?

David Scourfield (Chief Planning Officer, LB of Ealing): I think the challenges are twofold. One, it is identifying sites that perhaps we are unaware of, as my colleagues are saying. So much work is being done now to alleviate the pressures for additional housing - full stop - that the obvious sites have already been identified or are coming up. Then, purely from a resource point of view, going out, if we can go out, and identifying the very small sites that we are not aware of is a huge resource ask. I know, Sam, from the Policy Team, if you want to come in on that.

Sam Cuthbert (Principal Strategic Policy Planner, LB of Ealing): The thing about small sites is, by definition, we do not know what they are. We do not identify a site in advance. In some senses, almost from a plan making perspective, it is almost a no-sites policy because you are not identifying land which you know about in advance and then facilitating development on it. You are making a speculation that sites which are currently occupied by development of one or another sort maybe being within the cartilage of an existing house, for example. You are speculating that a proportion of those will come forward during the plan.

The resourcing of trying to identify those is one thing. It is too many sites, many chased by too few officers with too little information but, it turns more into less of a capacity issue and more of a question of how do you deliver those sites? You could take the methodology that is used in Policy H2 basically speculating about what the physical capacity sites is which may or may not be a reasonable estimate. But, the thing that is not supported in any way, which my colleagues alluded to earlier, is the 1% per annum target. The only thing we know about that currently, in Ealing's case, is that we are realising houses at a rate of roughly 300 a year rather than the 1,000 that the methodology would give for us. What we know about the 1% figure is currently will we deliver a third of it.

Navin Shah AM: You mentioned, in a sense, capacity and resources. That was going to be my next question. What added support would you need to better deliver those small sites? Already, there is, as you mention, too

few officers, etc. There is that capacity issue. What do you think would help the boroughs to better help the team with resources?

Sam Cuthbert (Principal Strategic Policy Planner, LB of Ealing): To be honest, it is probably about a different skillset than we would normally use in our site identification or analysis process. It is probably more about trying to come up with tools that facilitate the delivery of those sites whether it is a particular model of financing or units, which can be delivered faster or something like that. Attempting to plan for sites which are fundamentally uncertain in the planning process would not be helped by additional officer resources. It is almost a question of looking at it from have you incentivised or how you deliver those small units rather than have you planned for them?

Jane Richardson (Assistant Chief Executive Growth and Regeneration, London Borough of Bexley): I would agree with that entirely. There is something just fundamental about the sites themselves. We are a very small landowner. Our housing stock transferred about 18 years ago. As a local authority, we have little to capitalise change with. There is something about incentivising people to bring their sites forward, but they are complex, and these small sites do suck up far more resource both from the developers and us than the larger sites do. There is rarely a site that is straightforward. You get covenants that suddenly get unearthed. I just genuinely think this is hugely challenging but would support what Sam just said as well.

Heather Cheesbrough (Director of Planning and Strategic Transport, LB of Croydon): A couple of things. There are things you can do as a local authority and then you do not need to go out and do it all because developers will do it for you. What I mean is that if you have the right quality context which encourages small sites to come forward, that is positive, and you send the right messages out. But, you have to understand your borough and we have a borough character appraisal and we detail work, therefore, we can understand what the areas are that we think small sites will come forward in, what is the typology there? We have a good understanding.

From that, we have identified four zones of intensification particularly. While we are happy to do intensification throughout the borough, and we say we want development as a minimum of three storeys throughout the borough, but that is dependent on character. We have also identified four specific zones of intensification where you have areas like district centres or potential centres where you have got good infrastructure, but it is not fully utilised. You have got quite low-density housing around it. We have said, of those four areas, development could be a lot bigger in those areas, to use the infrastructure that is already there.

What is interesting, by having all that positive policy context, is that the developers go out there and identify the sites for you. In Croydon, we have quite a growing collection of specialist small to medium sized developers who are going out there and they are knocking on people's doors and they are asking to buy their houses. This can be a positive and a negative. It is a positive in that they are bringing forward the sites. It is a negative in the sense that there are sometimes vulnerable elderly people in their houses and one of the consultation events we have done recently for our SPD, we have people telling us and they said they have five or six developers knocking on their doors wanting an option on their house and they feel a little bit hounded by this. On one hand, that is the market and it is working.

It is interesting because the community is sort of, on one hand, saying, "We don't want intensification. It is going to change the character of our area" but when somebody is waving a lot of money under their noses, that is changing their ideas. They are thinking, "Well, maybe we can downsize. Maybe we can move out". That is happening and that is why a lot of those sites are coming forward. In several streets in Croydon, five, six, seven, eight, nine houses are coming forward and being redeveloped. We now know certain roads and go,

“Oh yes, that is that road. It is coming forward”. It is getting the right policy context that is helpful. I am not sending officers out saying, “You identify specific sites” at all.

Nicky Gavron AM (Chair): It is so interesting what you have just said because you are saying that it is being facilitated, in a sense, in a private sector, but are they looking to people downsizing into their own community?

Heather Cheesbrough (Director of Planning and Strategic Transport, LB of Croydon): We do want to ensure that people can downsize. One of the problems we have got is, as I said, the south of our borough is large detached houses and people do want to stay in that community, but they do not want to live in a five-bed house. They want to move down to a two-bed or a three-bed and there is not that much around at the moment. That is why we see it fought in Planning Committee because people say, “We must have these family houses. We cannot have flats” as if flats were something terrible, but they are there for people of all ages and times in their life. That is a very positive thing and that is what we are talking to communities about is that it does provide choice for people to be able to stay in their communities. That is a positive message from a small site redeveloper.

Nicky Gavron AM (Chair): But they do not want to move into one-bed flats. They would rather move into two or three.

Heather Cheesbrough (Director of Planning and Strategic Transport, LB of Croydon): I think, yes, people would find it harder to go from a five-bed to a one-bed. As I said earlier, small sites do provide opportunities for a wider range of typologies than potentially inner city living.

Navin Shah AM: They also need to be accessible. If you are talking about elderly residents moving, or downsizing, their accommodation will also need to be accessible and that is something that should be key to what provision is acquired.

Heather Cheesbrough (Director of Planning and Strategic Transport, LB of Croydon): Indeed, and the London Plan is very supportive. It specifically requires ground floor flats to be accessible and that is important because we have this debate about we need more bungalows. A flat that is accessible provides just as good accommodation for somebody with accessibility mobility needs as a bungalow.

Navin Shah AM: Will it be possible to identify how residential conversions can contribute to small sites? Is that exactly what you are talking about?

Heather Cheesbrough (Director of Planning and Strategic Transport, LB of Croydon): Yes. We do have residential conversions. From a sustainability point of view, they are better. For instance, there was one at Committee only last week which is like a large detached house that was converted into four flats and then there was two units and a rear garden. That was extending the existing premises and building in the back garden as well. There are opportunities there.

The thing I would say is that we do also have a policy about safeguarding family houses of 130 square metres and less because you do want to retain those family homes, the smaller ones as well.

Navin Shah AM: The question is what is the proportion of such conversions coming forward and are you actively promoting that as well as policy for it to come on the market?

Heather Cheesbrough (Director of Planning and Strategic Transport, LB of Croydon): Yes. We are very happy with conversions because they are more sustainable, and it can often help retain character and it

could go down better with the community. We often hear the community say, “We would much prefer this house to be extended rather than totally redeveloped”. We are open to it and we do not have an issue at all with conversions.

Nicky Gavron AM (Chair): Can I just come in on that? When they are converted, are they for rent or for sale?

Heather Cheesbrough (Director of Planning and Strategic Transport, LB of Croydon): It depends on whoever converts them.

Nicky Gavron AM (Chair): Because family housing is very flexible housing stock and if it is chained into the sale, then it is very hard to be flexible.

Navin Shah AM: I would have thought the building would be for sale, is it not, if they are private dwellings being brought up to be converted?

Heather Cheesbrough (Director of Planning and Strategic Transport, LB of Croydon): Generally, it is for sale, but it really depends on who the developer or the investor is, at the end of the day.

Dr Riëtte Oosthuizen (Partner, Planning, HTA Design LLP): The challenge around identifying appropriate small sites, is that existing tools in place such as the brownfield registers have no effect. There is a question about can new ways be put in place of encouraging communities to identify some of these sites and bring them forward? We should not always think that people will not support this type of thing. If people can think about it themselves, we might be surprised [at what they would put forward]. At the moment, the research we have done, officers basically only ‘identify’ sites already known in the HEELA or SHLAA. There is not any process of proactively going to search for these potential small sites.

Of course, then when a site is on a brownfield register, there is the whole process of planning permission in principle which could be problematic, maybe, but it is an existing planning tool. I would support what Heather has said. If you do something else, which is encouraged by the NPPF, it is about thinking about local character as set out in paragraph 122 of the new NPPF and also thinking about whether you want that character to effectively change, identify some areas proactively because you have looked at it. Then, I think you will see different behaviours coming forward, but it does not help you to assess exactly how many of those sites there are.

Navin Shah AM: Thank you. Can I get responses from the team presenters on issues which are already flagged up to do with small sites posing challenges, transport and infrastructure capacity and the issue about character of the locality and, also perhaps some comments on conservation area implication as well? Maybe we will start again from Ealing.

David Scourfield (Chief Planning Officer, LB of Ealing): Small sites, obviously by definition, tend to be surrounded by either existing residential or existing commercial and, therefore, are more likely to throw up issues to do with the relationship with the existing urban fabric, impact of proposed new development or conversion, on the local surrounding residential occupiers. We see that, probably not regularly at Planning Committee, but it is a definite concern with our members and their constituents.

We move away from the developed town centres into - what we call - the hinterland where the pigtails drop off. Obviously then, transportation, transport becomes the issue with local residents. They are requesting local highways, particularly the demand for onsite car parking if it has not been provided onsite.

We had 29 conservation areas. Of course, some of these small sites are going to be located within those and they throw up a whole range of heritage issues as well. They are not typically easy sites. I just echo what has already been said. They are more difficult in many ways to take through the planning system. They are more resource intensive in terms of negotiations with our planning officers, with the developers who may not be as expert as planning consultants on larger sites. There is always the issue of viability looming large where developers will be saying, "There is no way we can afford a tariff on sites less than nine units" and where they fall into the category of major developments over 10 to 25, for instance, where we are requiring a proportion onsite.

We have small schemes that have been locked in negotiation for anywhere between 12 and 18 months, trying to figure out whether they are viable on the ground. They are difficult in their own rights to take through the planning system.

Navin Shah AM: Maybe with infrastructure, there will be. There always are challenges when you are delivering small sites or commercials of small buildings. That is to do with basically a small zone because you have an average of two to three bins for a unit, then you have two or three on the same site. That is a real challenge whereas car parking, you look at sustainably for 10 of those arguments at the same time. That also becomes an issue.

David Scourfield (Chief Planning Officer, LB of Ealing): Absolutely.

Navin Shah AM: Now, is this something, given the sort of level of development we are looking at, which needs to be looked into as part of strategic policy?

David Scourfield (Chief Planning Officer, LB of Ealing): It is covered in all our policy requirements. I cannot speak for other boroughs but certainly, in terms of the case like the Imperial College, in terms of complaints, where you have small scale conversion of property, one of the biggest complaints is where the refuse is going to be, where are the cycle parking facilities going to be? It is that changing of the front of the site that 15, 20 years ago, would have been due to putting one or two car parking spaces on it. Now, it is about refuse and it is about cycle parking.