

Mr Christopher Waller comments

Page: [Draft New London Plan](#)

Section: [N/A](#)

I am a licentiate member of the RTPI and a graduate policy planner working in local government, however these are my own personal views and do not necessarily reflect those of my employer.

As a general supportive comment, I wish to thank the Mayor and the GLA for taking brave but necessary steps towards resolving London's housing crisis. Increasing supply to match the demand of a rising population and changing household formation will only stop things getting worse, and will by no means going to solve the affordability problem, but increased supply is a pre-requisite for other policies that would solve the problem, many of which are currently beyond the Mayor's gift.

Page: [Policy SD3 Growth locations in the Wider South East and beyond](#)

Section: [2.3.6](#)

Improved orbital connections would improve access to job opportunities in key locations such as Reading and Oxford, and free up capacity at transport nodes within London, especially on the rail network where the fastest route is often into inner / central London and back out again via mainline termini or interchanges such as Clapham Junction.

Page: [Policy D4 Housing quality and standards](#)

Section: [D4](#)

Housing that is smaller than that described in Table 3.1 should be permitted in some circumstances, such as where:

- Ceiling heights are substantially higher than 2.5 metres
- The housing unit is a self-build property and can be conditioned for use as such [the condition could last for the same duration of time as the CIL clawback period for the self-build exemption]
- A small-scale historic structure (eg a pumping station) has been converted
- It is possible to demonstrate that with custom furniture / fit-out, there would still be an adequate standard of residential amenity

Page: [Policy D4 Housing quality and standards](#)

Section: [Table 3.1](#)

Homes smaller than the minimum standard should be permissible where design features such as very high ceilings, sleeping mezzanines, wetrooms (as opposed to separate shower trays), Juliet balconies, etc are included within the unit, subject to the applicant demonstrating that the usability and liveability of the home would be acceptable in relation to its location (eg the CAZ or a town centre) / context.

Page: [Policy H1 Increasing housing supply](#)

Section: [4.1.4](#)

In addition, Boroughs and the GLA should also proactively support the delivery of housing by major employers for their workforce (including but not limited to "key workers"), subject to appropriate management. Given that London's housing crisis is largely a result of jobs growth outpacing that of housebuilding, encouraging major employers to provide housing (as was often practiced historically) in a similar fashion to student accommodation would provide a good option for some.

Page: [Policy H2 Small sites](#)

Section: [H2](#)

As there will be large numbers of locations where detailed local knowledge can help identify opportunities, the role of neighbourhood planning in identifying small sites ought to be acknowledged within the supporting text.

Page: [Policy H2 Small sites](#)

Section: [4.2.6](#)

This policy is very good, and what needs to be understood is that the opponents to this policy do not fully appreciate the importance of London as a global city that is able to attract and retain highly mobile and talented individuals. Obviously, there are sensitivities surrounding this, but Tokyo is the only major global city to keep house prices under some degree of control, and this is largely due to the extremely liberal attitude to the redevelopment of small housing sites to provide higher densities. Allowing the market to deliver on smaller sites will allow for local government to focus on unlocking larger sites.

The absence of any specification in terms of housing type (in terms of bedrooms / unit size) is desirable, as in practice restrictions on new studio / one bedroom property increase the pressure to convert existing family housing into flats or HMOs. It needs to be made clear that provision of new housing aimed at single adults helps to protect family housing.

One inference from Policy H2 is that boroughs in some circumstances may well end up adopting a de facto "hybrid" zoning system with the use of design codes (and in particular LDOs), with buildings up to a certain height / a certain floor area ratio / certain density of units or habitable rooms / with certain set-backs etc. being approved subject to a suitable exterior treatment and layout. I support Policy H2, but would overall be even more supportive of such a move if it were more clearly communicated that it may be useful or necessary to adopt certain aspects of a zoning system.

Page: [Policy H2 Small sites](#)

Section: [4.2.11](#)

In general an assumption against the amalgamation of flats into larger units is valid, exceptions being where a historic layout is being restored in a listed building, or the flats a property has been divided to are unfit for purpose.

Page: [Policy H2 Small sites](#)

Section: [Figure 4.3](#)

Unclear if this map shows some stations immediately outside Greater London (eg Grange Hill tube station) where the 800m radius extends into Greater London.

Page: [Policy H2 Small sites](#)

Section: [4.2.13](#)

Agree with the use of off-site contributions on small sites - aside from helping to avoid the artificial "capping" of schemes at 9 units and avoiding management issues, this also allows for funds to be spent on the type of property that RPs and LAs need where it differs from the mix of unit sizes being delivered on small sites.

Page: [Policy H18 Large-scale purpose-built shared living](#)

Section: [4.18.7](#)

Neutral -

The types of shared living or co-living scheme covered by H18 are in general terms not suitable as affordable housing; however for some people, such as key workers including nurses or junior doctors without dependent children, they may be a suitable affordable housing product if it is affordable relative to their own incomes.

It should therefore be acceptable for the operators of large-scale purpose-built shared living schemes to fulfil all or part of their affordable housing obligations by entering into a nominations agreement with an NHS trust or other public body to provide discounted housing for key workers; providing that such an arrangement is not merely for the developer's financial benefit. Such a nominations agreement would also provide public support for these schemes in locations where there are NHS staffing pressures (in part caused because of the cost of living for staff).

Page: [Policy S3 Education and childcare facilities](#)

Section: [S3](#)

In addition, the Mayor should use planning enforcement and CPO powers against illegal faith schools with a view to bringing them into the state sector, or redeveloping the sites for housing, as these lead to poor educational outcomes compared with other Londoners, with resultant unemployment, and are a child welfare and health and safety risk.

Page: [Policy E4 Land for industry, logistics and services to support London's economic function](#)

Section: [E4](#)

In some instances, location of logistics, data centres, waste facilities, and other service and support facilities can be located in sub-terranean locations (this is currently being pursued in Hong Kong), and this should be actively explored as an option where it would free up surface land for housing

Page: [Policy G2 London's Green Belt](#)

Section: [8.2.2](#)

There is no need for the London Plan to be more prescriptive regarding Green Belt than the NPPF. An inflexible attitude to Green Belt release merely forces commuters outwards and results in longer commutes and higher carbon emissions.

In the long term, the Mayor should seek to establish a Royal Commission into the Green Belt in light of its significant departure from the concept of a narrow "Green Girdle" into a thick band which people still "leap-frog" at significant environmental disbenefit when commuting into London. A Copenhagen style "finger plan" should be seriously considered.

A short term measure within the remit of the London Plan would be to rename the Green Belt something less emotive, such as an "Urban Containment Zone". This would help neutralise the more emotive and less rational arguments in favour of its retention.

There should be a presumption in favour of Green Belt release where such land is within PTAL 3-6, or 800 metres of a town centre, or a tube or rail station; unless other environmental designations such as flood risk, SINC, or SAC apply, similar to policy H2.

Page: [Policy G2 London's Green Belt](#)

Section: [8.2.2](#)

The urban heat island effect is generally localised and concentrated in central and inner London - protecting green space in Inner London will do more good in that regard than tracts of Green Belt near Romford or Bexleyheath. Green Belt land can have environmental benefits where of good quality, but the urban heat island effect is not one of them given its location.

Page: [Policy T6 Car parking](#)

Section: [N/A](#)

There should be an additional assumption that the areas covered by the presumption in favour of small sites in Policy H2 should not have development capacity constrained by any shortage of on-street parking, and such areas will be assumed to have controlled parking zones for the purpose of calculating overspill, irrespective of whether they have been introduced or not. This will force the hand of authorities which have not introduced CPZs.