

LONDON SUSTAINABLE DEVELOPMENT COMMISSION (LSDC)

RESPONSE TO DRAFT HOUSING SUPPLEMENTARY PLANNING GUIDANCE

Introduction

The London Sustainable Development Commission (LSDC) was established in 2002 to advise the Mayor of London on ways to make London a sustainable, world-class city. The Commission is an independent body advising, supporting and challenging policy makers to promote a better quality of life for all Londoners, both now and in the future, whilst also considering London's wider global impacts.

Draft Supplementary Planning Guidance

The LSDC welcomes the 2011 drafting of the Housing Supplementary Planning Guidance as a means of enabling the policies contained in the London Plan to be implemented, particularly via the Borough Local Development Frameworks and through the bringing forward of relevant development proposals.

We provide comments under the headings of the different Parts of the SPG, concentrating on the areas where we particularly support the approach being described, or where we have some concern about implementation. In the latter case we indicate an alteration or action that might be helpful in addressing our concerns for the economic, social and environmental sustainability of housing provision in London.

Part 1 Supply

1.1 Partnership working

The LSDC spoke at the London Plan Examination in Public in support of the development of partnership working at sub regional level, particularly for the growth areas and co-ordination corridors (paragraphs 1.2.5 – 1.2.6). We understand that there is some variation in the effectiveness of the partnerships. We hope that it will be possible to remedy any deficit over the coming year, and report progress in the Implementation Plan.

1.2 Optimising housing potential

The LSDC supports the concept of optimising rather than simply maximising housing provision, including the reference to using the density matrix as a guide rather than an absolute rule (paragraph 1.3.19).

However, we consider that it will be important to ensure that the LDFs are consistent in their demarcation of the boundaries of the central, urban and suburban settings (paragraph 1.3.30) so as to be robust in the face of challenge at inquiry. The issues will be particularly crucial in outer London and it would be useful if the Outer London Commission could provide some further guidance in the context of their work on densities.

1.3 Levels of car parking

The importance of residential developments taking place close to public transport links is clearly important in helping to reduce the need for parking and therefore linking parking provision to PTAL is

useful and the simpler matrix provided under option1 (Annex para 2.4 p95) which allows for greater flexibility, whilst not increasing maximums, could therefore be considered a better approach.

In addition, when considering parking provision, consideration could also be given to the likely nature of the residents of developments and their need for parking, e.g. one bedroom flats are not likely to be occupied by those with children and are likely to have a lesser need for parking provision.

Part 2 Quality

2.1 Space standards

The LSDC welcomes the application of space standards to all new dwellings regardless of tenure (paragraph 2.3.13), and the guidance provided on storage, adaptability, privacy, disabled provision, etc - all of which are essential if new housing stock is to be fit for purpose over the long term.

2.2 Climate change

The LSDC is supportive of the coverage of mitigation and adaptation issues (paragraphs 2.3.43 – 2.3.60). We would suggest that a cross reference be included in the earlier discussion of density (see 1.2 above) pointing to the significance of 50 homes per hectare in supporting combined heat and power systems, so that this is flagged up as a particularly important consideration.

2.3 Children's play

The LSDC has recently published research into the importance of access to nature for children (Sowing the Seeds 2011 <http://www.londonsdc.org/documents/Sowing%20the%20Seeds%20-%20Full%20Report.pdf>).

We are concerned that there is an emphasis on formal play provision (paragraph 2.5.1) without mention of appropriate access to areas of nature at a neighbourhood level. We suggest that off-site provision of this kind should be referenced (paragraph 2.5.2).

The LSDC hopes to respond in April on the related issues in the consultation on the SPG Providing for Children and Young People's Play and Informal Recreation.

Part 3 Choice

3.1 Affordable family accommodation

The LSDC endorses the Mayor's emphasis on provision of family housing, and the importance of not just maximising the number of units in a particular scheme (paragraph 3.1.20). We agree that more detailed fieldwork by the Boroughs and discussion with communities will be required to define areas where the needs of larger families are concentrated (3.1.43).

3.2 Other specialist needs

The LSDC supports the requirements regarding the needs of the disabled via Lifetime Homes standards and provision for 10% of stock to be wheelchair accessible or easily adaptable (paragraph 3.1.22).

Concerns about the increasing proportion of older people are well addressed through design standards for mainstream housing (see 2.1 above). The LSDC supports the establishment of public/private partnerships to provide high quality smaller accommodation attractive to those who might consider down-sizing (paragraph 3.1.28).

3.3 Mixed and balanced communities

The LSDC is concerned that there should be strong policy in LDFs to assist the balancing of neighbourhoods in terms of market and rented housing by enabling development of the minority tenure in specific areas (paragraph 3.2.6). Our view is that increased social cohesion should be an important element of the Mayoral initiative for "Putting the Village back into the City".

We therefore support the initiative for Boroughs to undertake neighbourhood analysis as the basis for local policy to guide affordable or market provision in the neighbourhood (paragraph 3.2.7). However, we are concerned that purchase of individual homes to enable conversion of tenure will be controversial and provide little impact (paragraph 3.2.10).

Part 4 Affordable Housing

4.1 Affordable rent

The LSDC has commented separately on the Affordable Rent SPG, and the points raised are not repeated here. See:

<http://www.londonsdc.org/documents/comments/LSDC%20response%20February%202012.pdf>

4.2 Targets

The LSDC supports the use by Boroughs of both numeric and percentage targets, with the latter being useful as a starting point for negotiations on specific sites (paragraph 4.3.23). We also concur that it is important that Boroughs reflect their contribution to the strategic London target, and that neither the strategic figure (paragraph 4.3.5) nor the local target (paragraph 4.4.6) should be treated as a cap. The LSDC expects that performance against targets for affordable housing provision will (with overall housing targets) be one of the more significant aspects to be covered in the annual Implementation Plan.

4.3 Individual Schemes

With regard to off-site provision, the LSDC considers that Boroughs should be requested to make very clear that such provision is exceptional, including when they prepare a policy on contributions to an affordable housing pot (paragraph 4.4.12).

On thresholds, the LSDC agrees that where smaller sites (below the 10 unit threshold) are located in areas of high owner occupation, provision of affordable housing should be particularly encouraged to achieve a more balanced community (paragraph 4.4.5) – see also 3.3 above.

Part 5 Stock and investment

5.1 Retrofitting

The LSDC is pleased that reference is made to retrofitting with appropriate cross references (paragraph 5.1.3). An additional paragraph giving some examples of what can be achieved would help to give this work greater prominence in the SPG.

5.2 Estate renewal

The reference to estate renewal helpfully refers to the need to reinstate an equivalent housing floorspace, while giving flexibility for a wide range of solutions (paragraph 5.1.10). However the mention of engagement with the existing community could be strengthened by providing references to some relevant schemes and approaches (paragraph 5.1.4).

Part 6 Social infrastructure

6.1 Supplementary Planning Guidance and Best Practice Guidance

The LSDC has provided a submission on the Olympic Legacy SPG that makes clear our concern that provision of the appropriate social infrastructure is of vital importance in the developing of new housing and other development. See:

<http://www.londonsdc.org/documents/comments/LSDC%20response.%20November%202011.pdf>

We note the reference to the forthcoming Shaping Neighbourhoods SPG (paragraph 6.1.4), and would like to take the opportunity for early involvement in its preparation. We understand that the Health Issues in Planning BPG is also likely to be revised in 2012 and would like to have the opportunity to contribute.

Part 7 Mixed Use Development

7.1 Town centres

The LSDC support the proposal that mixed use development including housing for older people and students can provide a major boost to town centres, particularly in Outer London (paragraph 7.4.4). We look forward to continued contact with the Outer London Commission on the issues involved, and would be interested in assisting with the SPG on Town Centres that the Mayor is proposing to prepare (paragraph 7.4.9).