

London Plan EiP Additional Statement

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Public

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1 INTRODUCTION

- 1.1 Bovis Homes Ltd has been invited by the Panel appointed to examine the London Plan to appear at the Examination in Public on various matters.
- 1.2 Bovis Homes submitted responses to the London Plan consultation and wishes to supplement their previous statements with additional statements relating to the specific matters that the Panel has raised.
- 1.3 In this Statement, we respond to the Panels Matters M10 and M11 which relate to the overall spatial development strategy.

2 M10

- 2.1 The Panel questions whether the vast majority of development needs could be accommodated in London or whether the wider South East should accommodate some of these needs.
- 2.2 Concentrating on housing needs, it is Bovis Homes' view that not all of London's housing needs can be accommodated within the boundaries of London and it is inevitable that some of its housing needs would be accommodated outside London.
- 2.3 Bovis Homes points to the recent examination into the Vale of Aylesbury Plan (VALP) where the Inspector has raised concerns about the relationship between the Housing Market Area in which Aylesbury Vale Council exists and the Wider London Housing Market Area.
- 2.4 In particular paragraph 15 of the Interim Findings dated 29 August 2018 sets out that:
"To some extent, migration is a self-fulfilling prophecy, in that the supply of housing can induce migration within a given travel to work area just as it can affect household formation rates. Given the identified relationship between the Central Buckinghamshire Housing Market Area as defined, the wider London Housing Market Area with which it overlaps and the Milton Keynes Housing Market Area which prevails in the northern part of Aylesbury Vale district, this consideration is likely to be relevant to Aylesbury Vale".
- 2.5 As such, it is our view that Inspectors in Local Plan examinations across the wider south east are considering that some of London's needs would be accommodated outside London and this approach appears to be reasonable.
- 2.6 We agree that there are significant housing needs in London and endorse the 66,000 new homes per annum figure that is London's needs. However, as the Mayor has accepted, not all of London's needs can be met utilising the current strategy (Policy SD3) and *"Therefore, the Mayor is interested in working with willing partners beyond London to explore if there is potential to accommodate more growth in sustainable locations outside the capital"* (para 2.3.4). It is fairly clear that the current strategy of concentrating on previously developed land within London's boundaries will not deliver the required amount of housing.
- 2.7 However, we advocate a two-pronged approach to deal with the housing crisis in London, which is not only accepting that some of London's need can be accommodated outside London, but also, in accordance with National Policy (both the 2012 and 2018 versions), it is our view that exceptional circumstances exist to allow some sustainable Green Belt release in areas under the greatest pressure.
- 2.8 The latest data on housing completions in London was released by the Ministry of Housing, Communities and Local Government (MHCLG) on 15 November 2018. This shows that within the Greater London Authority (GLA) boundaries, only 31,723 new homes were delivered in the period 1

April 2017 to 31 March 2018. This is a significantly lower figure to the previous year, when nearly 40,000 new homes were delivered and is less than 50% of the required annual target which the Mayor is advocating.

- 2.9 There are significant divergences between the performances of local authorities within London with some suffering a significant reduction in housing delivery (for example, Tower Hamlets, where 4,827 new homes were delivered in 2016/17 and only 2,003 in 2017/18.
- 2.10 The data also shows that at no time since 2001 has London delivered more than 40,000 new homes per annum. Therefore, the challenge here is exceptional.
- 2.11 As such, and in accordance with our previous representations, a step-change is required in order to assist in alleviating the housing crisis in London. Bovis Homes' view is that this could be via two changes to policy. The first is recognition that not all of London's needs can be accommodated within the GLA area without a comprehensive Green Belt review and release for development. Secondly, that suitable Green Belt and MOL is released for development by the relevant boroughs (if required to meet their housing targets).

3 M11

3.1 The Panel questions whether some of London's development needs should be met through reviewing Green Belt and MOL.

3.2 Bovis Homes' position is clear that in order to meet the overall requirement, a review of the Green Belt is essential. Bovis Homes point to numerous authorities surrounding London where a Green Belt review (and Green Belt release) has been endorsed by Inspectors as being in accordance with national policy. In particular, recent Local Plans such as East Herts, where the Secretary of State considered intervention in the Local Plan process but concluded in his letter dated 12 October 2018 that:

"The Inspector set out in her report that there had been a rigorous process of balancing the importance of the Green Belt and the impact of development against the benefits. Further, she considered that there was an acute need for housing in the area and that each of the proposed sites was the most sustainable in contributing to meeting the needs of the area. Taking into account the factors above, I do not differ from the conclusions the Inspector appointed to examine the Plan reached. I am satisfied that the approach taken is consistent with the relevant national policy".

3.3 The latest net housing delivery figures demonstrate that the housebuilding industry had 'stepped up to the plate' and increased the quantum of new homes. Nationally, the number of new build homes increased from 163,939 in 2015/16 to 183,571 in 2016/17 and further to 195,294 in 2017/18. However, in London, the number of new build homes delivered in 2015/16 and 2017/18 is similar (26,465 in 2015/16 and 26,769 in 2017/18).

3.4 Whilst there could be several reasons why London is different to the rest of the country, it is our view that in many other parts of the country there is recognition that there needs to be suite of development options and that concentrating solely on brownfield land and intensification does not lead to development that meets local needs and also does not, on some cases, deliver the most sustainable option for meeting housing needs.

3.5 The Mayor's blanket protection for the Green Belt is not evidence based and does not follow national policy. The evidence is that continuing with the current London Plan strategy will simply not deliver anywhere close to the numbers of new homes required.

3.6 Bovis Homes, together with other national and regional housebuilders, are determined to assist in meeting London's housing needs. Housebuilders deliver a range of development types to meet the needs of the local population, in suitable and sustainable locations. However, we have found that such locations are highly limited in London given the reluctance of the Mayor to consider greenfield and Green Belt sites. What this could mean is that families wishing to live in London in suitable accommodation (and not flats) would not have the supply to meet the demand and may be forced to

leave London thus enduring longer commuting times and leading to unsustainable patterns of development, whilst also affecting the general demographics of London, which may be considered as a city unsuitable for families.

- 3.7 Clearly, this would not be the case in every Borough, and each individual Borough will need to consider the specific circumstances that face it, and whether sufficient land and development proposals exist to meet the specific need identified in that area.
- 3.8 However, there may well be cases (for example, we have pointed out in our representations that the London Borough of Croydon has a significant demand for larger family homes, yet a large percentage of homes delivered and planned are set out as flats) where local circumstances are 'exceptional' so that authority may consider that Green Belt is required to meet needs.
- 3.9 There is nothing exceptional in developing a policy that allows the release of suitable Green Belt land as this approach is wholly compliant with National Policy. Indeed, a strategic approach that allows local authorities to consider their own circumstances is appropriate in these circumstances.
- 3.10 We also point out to the Panel, that the Green Belt designation constrains several authorities to a greater extent (Havering is 53% Green Belt, Bromley 51%, Hillingdon 43% and Enfield and Redbridge 37%). Data on housing development can be found in the Land Use Statistics issued by MHCLG. The latest data (May 2018) shows that housing development already takes place in the Green Belt with 26% of all new residential addresses in Hillingdon created between 2013 and 2017 being located in the Green Belt. In addition, 13% of all new residential addresses in Redbridge were in the Green Belt and 11% of Bromley's.
- 3.11 As such, even when delivering lower housing figures that envisaged in the London Plan, the Green Belt has had a role to play in assisting in meeting development needs.
- 3.12 Therefore, given: the pressure on London; its inability to accommodate its needs; and the role that the Green Belt already plays in meeting development needs, there is no reason why the London Plan should not allow local boroughs to consider some Green Belt release should exceptional circumstances be demonstrated.
- 3.13 Bovis Homes' interest lies particularly in Croydon, which is an outer London Borough, 27% of which is designated as Green Belt, however, Croydon is typical of the challenges that face London.
- 3.14 Croydon's recently adopted Local Plan (2018) notes that over 44,000 new homes are required in the Borough by 2036, however "*There is limited developable land available for residential development within the built up area meaning that it is only possible to plan for 32,890 new homes in the plan period*" (paragraph 4.1 of the 2018 Local Plan).

- 3.15 The London Plan now seeks to ensure that Croydon delivers at least 29,490 new homes over a ten year period which is close to the circa 33,000 that the Local Plan sought to deliver for twenty years. We agree with the position of Croydon Council that it has limited brownfield land. As such, it may be the case that in order to meet the London Plan housing figure, Croydon may have to look at alternatives to brownfield land, such as the 27% of the Borough currently protected as Green Belt.
- 3.16 The current draft London Plan policies do not allow this approach and as such would not allow authorities to meet local needs. This will only lead to unsustainable development and / or not meeting local housing needs.

4 CHANGES REQUIRED

- 4.1 It is our view that the Mayor has to recognise that the annual housing figure of 65,000 new homes per annum from the period 2019/20 to 2028/29 will not be met solely through the proposed policies of the London Plan. The latest housing completion data demonstrates that a step-change is required and this will not be achieved solely by increasing densities and concentrating on Opportunity Areas.
- 4.2 There needs to be flexibility in terms of housing delivery and that this can only be achieved through a flexible policy on housing delivery, which includes the opportunity for local councils to review Green Belt boundaries.
- 4.3 This will allow housebuilders to bring forward new homes that are required now. The latest data on new homes demonstrates that home builders can increase the delivery of new homes in areas of high need, however, they need planning policies that are able to respond to changing circumstances.
- 4.4 In this case, the flexibility requested by Bovis Homes is recognition that in order to solve London's housing crisis and not lead to unsustainable patterns of development, local councils should be able to consider sustainable Green Belt as a potential location for housing development.