

## Examination in Public of the draft London Plan: Written submission by CPRE London (1142) to the EIP Panel, December 2018

### HOUSING SUPPLY AND TARGETS

*Matter 19: Are the overall 10 year housing target for London and the target for the individual Boroughs and Corporations set out in Policy H1 A and in Table 4.1 justified and deliverable? In particular: a) Are the assumptions and analysis regarding site suitability, availability and achievability and development capacity for large sites in the Strategic Housing and Employment Land Availability Assessment (SHLAA) reasonable and realistic? b) Have the environmental and social implications of the proposed increase in housing targets been fully and properly assessed? c) Policy H1 B 2) a)-f) identifies various sources of capacity. Will these be sufficient to meet the ten years targets and what proportion of housing is expected to be delivered by means of the different types? How much is expected to be delivered on existing industrial land in the context of Policies E4-E7? d) Will the focus on existing built up areas rather than urban extensions using GB/MOL provide sufficient variety of house types and tenure? e) Is the emphasis on development in outer London consistent with the intention in Policy GG2 that seeks to proactively explore the potential to intensify the use of land on well-connected sites? f) Does the Plan adequately consider the cumulative impacts of other policies on the deliverability and viability of housing? g) What is going to bring about the step change in delivery implied in the Plan compared to the current one? What are the tools at the disposal of Boroughs in 1.4.6? Is it realistic to expect this to occur from 2019 or should there be a stepped or transitional arrangement? h) Should Table 4.1 include targets for different types and tenures of housing? i) Should the target be for longer than 10 years given that the plan period runs to 2041? j) How and where is the shortfall between the identified need of 66,000 additional homes a year and the total annualised average target of 64,935 to be made up? Will LPAs outside London in the wider south east be expected to deal with this on an ad hoc basis and is this realistic? k) Does paragraph 4.1.8A adequately explain how Boroughs are to calculate a target beyond 2028/29? l) What will be the implications for London Boroughs if the Plan targets are adopted which increase the requirement in recent development plans?*

1. CPRE London has major reservations about the deliverability of the overall housing target for London, and related Borough targets, given completion rates in recent years. We outline our concerns in more detail in our submission on Matter 17. We believe a more realistic approach to determining housing targets, taking account of the latest household projections, would help towards a more sensible discussion about the policy framework for housing supply. Above all, it could help ensure that the most suitable brownfield land is used first to meet housing requirements.

2. Despite these concerns, we are broadly supportive of the approach taken by the GLA in the 2017 Strategic Housing Land Availability Assessment (SHLAA). We are particularly supportive of the focus on existing built up areas which we believe is essential for meeting the objectives set out in Policy GG2, as indicated in our submission on Matter 18. While we support the overall approach taken to both small and large sites in the SHLAA, we believe that over the longer term there is likely to be even greater capacity to accommodate London's development needs within the existing built up area. Our submissions on Matters 10 and 18 refer to our recent work in Enfield which has revealed much greater potential for the more efficient use of previously developed land than is assumed by the SHLAA.

3. CPRE London broadly supports the strategic policy framework set out in Policy H1, as we also outline in our submission on Matter 18, and the various sources of capacity it identifies in H1 B2. We particularly welcome the emphasis on optimising the use of brownfield sites and redevelopment of car parks and low density commercial sites, including industrial sites suitable for intensification and mixed-use redevelopment. We also welcome the presumption against single use low density retail and leisure parks in Policy H1 F which should be strictly applied. As indicated in our submission on Matter 18, however, we believe that there should be explicit recognition of the potential to make better use of excessive or redundant road space and other land, alongside car parks, at Policy H1 B2d). The strategic challenge of reducing car-use in London and achieving the target of 80% of all journeys to be by active or sustainable travel modes by 2040 will release a large amount of space currently devoted to car use and it is important that the final Plan promotes its potential use for new housing.

4. CPRE London strongly supports the approach in the SHLAA towards excluding 'designated open space', including Green Belt and Metropolitan Open Land (MOL), as potential sites for built development. This is consistent with the Mayor's welcome commitments to protecting the Green Belt and MOL reflected in policies G2 and G3. We believe that the SHLAA provides adequate evidence to indicate that realistic development needs can be met without requiring the use of designated open space for the foreseeable future. We emphatically do not support the suggestion, therefore, that urban extensions on Green Belt or MOL should be considered.

5. Development on Green Belt land, in general, rarely represents sustainable development and nearly always the harm outweighs the benefits. Significant harm will be caused if Green Belt sites are lost because London's protected green spaces are essential to the long term sustainability of the capital, including by assisting sustainable transport provision and urban regeneration. London's Green Belt continues to perform vital environmental functions, including managing water, improving air quality and enhancing biodiversity, as well as important social and wellbeing functions by providing opportunities for informal recreation and sporting activities. As the use of London's built up area is intensified, designated open space will only become more important for those living and working in the capital, as we outline in our submission on Matter 11. It is essential that all alternative options for accommodating future development needs within London are fully explored, including consideration of policies to address regional disparities as outlined in our submission to Matter 16.

6. As well as its role in preventing urban sprawl and protecting the countryside from encroachment, it is important to recognise the critical role played by the Green Belt in promoting the reuse of previously developed land. This is reflected in its fifth official purpose 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land' (paragraph

134, NPPF, 2018). CPRE London believes that achieving the ambitious objectives for Opportunity Areas, for the intensification of low density retail and industrial sites, and for the reuse of appropriate small sites, as set out in Policy H1 B, will depend to a great extent on the maintenance of strict Green Belt controls. It will also help ensure that previously developed sites are prioritised for redevelopment as outlined in our submission on Matter 18 and in line with national Green Belt policies set out in the NPPF.

7. We strongly support the emphasis on development in outer London where we believe there is considerable potential to intensify use of land on sites with relatively high PTAL levels. We believe this approach is consistent with Policy GG2 provided that designated open spaces, especially Green Belt, are properly protected. We are disturbed at the growing number of Green Belt reviews being undertaken by Boroughs in outer London with the aim of finding land for housing, in conflict with the NPPF. This is explored in our recent national report *The State of the Green Belt* (CPRE, 2018) which reveals a significant increase in housing proposed on Green Belt land including around London. Large parts of the Metropolitan Green Belt have been reviewed over the past decade and in the majority of cases these reviews have concluded that the Green Belt continues to fulfil its purposes. We are concerned, however, at a growing number of cases where release of Green Belt land is being considered before it has been demonstrated that all suitable previously developed sites have been identified for redevelopment with appropriate minimum density standards, as required in paragraph 137 of the NPPF. Such reviews are undermining the permanence of Green Belt, one of its essential characteristics. This is why we support the proposed strengthening of policy in Policy G2 B concerning the 'de-designation' of Green Belt. We address this issue in more detail in our submission on Matter 65.

8. There are major uncertainties surrounding housing provision which are likely to have a significant impact on delivery in the short term. There are also considerable doubts over the whether there will be adequate resources available to help meet London's need for genuinely affordable housing. In view of these uncertainties, which we address in our submission on Matter 11, we do not believe that the 'step-change' in delivery that the draft Plan implies is likely to be achieved in the short term. In this context, CPRE London does not believe it would be sensible to set specific targets for different types or tenures of housing, beyond the strategic target set out in Policy H5. It would also not be sensible, at this point, to extend the housing targets beyond 10 years or to attach too much weight to the relatively minor discrepancy between the identified need for new homes and the annualised average target. We fear that to make adjustments of this kind would only add to pressure for the unnecessary allocation of Green Belt, thereby undermining efforts to make the fullest possible use of previously developed land.

CPRE London

December, 2018