

NON PARTICIPANT STATEMENT

RESPONDENT 3237

HIGHBURY GROUP ON HOUSING DELIVERY

M19. HOUSING SUPPLY AND TARGETS

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?

We have concerns that the estimate derived from the Strategic Land Availability Assessment (SHLAA) that London has a capacity for 65,000 new homes a year for the 10-year plan period is based on assumptions for increased development densities which are higher than those consistent with pre-existing plan policy on sustainable residential quality and will not provide for the range of building types and bedroom size mixes needed to meet the housing requirements assessed in the SHMA. Our primary concern is that development at the assumed densities will not provide sufficient family size homes. Further details are set out in the technical note attached as appendix 1. 3. We therefore question the basic assumption in the draft Plan, that over the next 10 years, London can meet its full housing requirements within the existing administrative London boundary. Providing the required level of new housing to meet the full range of housing requirements requires lower average development densities than assumed in the draft plan and consequently requires more development land than the quantum identified in the SHLAA. This means that a significant contribution to meeting the housing needs of the London metropolitan area, including the supply deficit within London administrative boundary, need to be met by development in the Wider South East. We welcome the draft plan's recognition, in policies SD2 and SD3, of the relationship between London and the Wider South East. However, the Plan must be explicit as to the housing contribution required from the Wider South East. It would be helpful in this context if a SHMA and a SHLAA consistent with those completed for the Greater London administrative area, were also undertaken for the Wider South East. While this is outside the planning powers of the Mayor, it would be helpful if the report by the Examination in Public panel makes a recommendation to this effect.

b) Have the environmental and social implications of the proposed increase in housing targets been fully and properly assessed?

We do not consider that the social implications have been fully considered as the Plan does not adequately acknowledge that the assumptions as to increased density of development have an impact on the type of homes built, their affordability and their appropriateness in terms of meeting the full range of housing needs assessed in the SHMA.

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?

It is not appropriate to set targets at regional or borough level for different sources of supply. However, it would be appropriate for the Plan text to give an indication of supply from different sources based on the data contained in the SHLAA. This would include an indication of the capacity arising from use of industrial land and an explanation of how this was compatible with employment generation targets. We do not however support the proposed minor modification to footnote 35 which changes the measurement of location in relation to a town centre which relates the 800m criteria to the boundary of the town centre rather than the centre of the town centre as previously applied.

d) Will the focus on existing built up areas rather than urban extensions using GB/MOL provide sufficient variety of house types and tenure?

No. The Plan should have included a review of the impact of alternative development options, not just on the quantum of output, but on the type of housing development generated in relation to the range of assessed housing requirements. Development at low or medium densities on appropriate sites designated as Green Belt which do not meet Green Belt objectives but do meet the criteria for Sustainable residential Development, including access to public transport and social infrastructure. could produce a range of dwelling types, tenures and levels of affordability not achievable on most brownfield sites. Where land is acquired on the basis of existing use value, development costs can be significantly reduced.

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?

Yes. The capacity assumptions for outer London boroughs reflect both increased investment in public transport and the potential for incremental intensification of areas in suburban boroughs with good transport connectivity and social infrastructure, without detrimental consequences for neighbourhood character. There needs to be a shift in the focus of development from hyperdense schemes in Central London and the Opportunity Areas on the periphery of central London to increased low and medium density development in appropriate suburban locations. This shift will help to provide a much wider range of housing outputs than the pre-existing Inner London and Opportunity Area focused development strategy. The pre-existing concept of intensification areas from the 2004 London Plan, which were primarily in suburban locations, needs to be revived.

f) Does the Plan adequately consider the cumulative impacts of other policies on the deliverability and viability of housing?

In our view viability of specific schemes in terms of the current availability of public and private

finance should not be a constraint on the setting of housing targets at borough level, which should relate to an aggregate assessment of the capacity of potential sites. This is primarily because these external factors may change during the ten- year period to which the targets apply, and to apply a strict delivery/viability test would constrain capacity-based targets.

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?

Delivery would be enhanced by a number of policy changes, including increased public funding for sub-market homes, changes in compulsory purchase rules to enable site acquisition at existing use value, release of appropriate sites (such as Green Belt sites) which meet sustainable development criteria. These enhancements rely on changes in national government policy and are largely outside the Mayor's remit as a strategic planning authority. In contrast, some economic and political changes, such as the potential fall in residential property values post BREXIT could lead to a falloff in private investment in residential development, and consequently as in 2008, require a significant increase in government financial support to maintain, nevermind increase, the current level of new housing output.

h) Should Table 4.1 include targets for different types and tenures of housing?

No. The setting of local targets is a matter for each local Plan

i) Should the target be for longer than 10 years given that the plan period runs to 2041?

No. targets for future years will depend on new SHLAAs. It is appropriate that the SHLAA is updated on a quinquennial basis and new targets set

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?

This process will be facilitated by a consistent assessment of development capacity across the Wider South East. In reality the London deficit between assessed requirements (in our view understated, as set out in our statement on matter M17) and actual annual delivery of new homes within London will be much greater than the assumed annual deficit of approximately 1,000 homes a year.

k) Does paragraph 4.1.8A adequately explain how Boroughs are to calculate a target beyond 2028/29?

Yes

I) What will be the implications for London Boroughs if the Plan targets are adopted which increase the requirement in recent development plans?

The legal position is that the new targets once adopted in the London Plan, supersede any lower targets in pre-existing borough Local Plans. Consequently, boroughs will have to revise their targets and identify and allocate additional sites for residential development. As the capacity has already been identified through the London-wide SHLAA, the inclusion of additional sites assessed in the SHLAA into borough Local Plans is technically possible, though in some cases it may be politically problematic.