

London Plan Examination in Public – Written Statement

Respondent Number	2536
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Matter 19

M19. 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:

The Assembly's comments on this matter are below. The Assembly also refers the Panel to its written statements on matters 10, 11, 12, 18 and 20 which are also relevant to this matter.

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

The Assembly does have concerns about the environmental and social implications of some of the plan's proposals, particularly with regard to the social implications of the size mix of new houses, and these will be addressed in later matters.

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?

H1 B 2) boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions, especially the following sources of capacity:

- a) sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m of a Tube station³⁴, rail station or town centre boundary³⁵
The Assembly notes the Mayor's minor suggested changes for policy H1 B2a that relates to optimising housing potential for sites within 800 metres of a station or town centre boundary. Specifically, the Assembly notes the amendments that (for the purposes of Policy H1B2a), the 800m distance is to be measured **from the edge** of the town centre boundary.

- b) mixed-use redevelopment of car parks and low-density retail parks and supermarkets
- c) housing intensification on other appropriate low-density sites in commercial, leisure and infrastructure uses

In London, town centres vary in size dramatically. In the larger town centres, 800 metres from the edge of a specified town centre boundary may encompass areas that have low PTAL ratings.

The Assembly recommends this policy is amended to specify that the optimisation of housing potential is restricted to areas around town centres that have PTAL ratings of between 3 and 6 - irrespective of the distance from town centres.

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?

The Assembly supports the policy for increased and intensified development in outer London as part of the extension of the 'compact city' approach. If London is to accommodate its projected growth within its boundaries, then outer London will need to increase its rate of development relative to past trends. However, this development should only take place in areas with good transport connectivity and the required supporting social infrastructure. In pursuit of intensification however, there should be no developments in outer London that pose detrimental consequences for neighbourhood character.

The Assembly refers the Panel to its written statement on matter 10. Essentially, to be sustainable, new homes must be supported by a range of infrastructure and in terms of transport, new infrastructure can open up sites and boost housing capacity. New infrastructure need not be expensive, as low-cost options, such as new bus routes, can open up new development sites – particularly in outer London.

There is, however, the issue of how to build a business case for new infrastructure without the increases in residential density that can underpin such cases. The Plan suggests local authorities define areas for intensification but that they also frame decisions on intensification in terms of existing or anticipated PTAL levels.

The Assembly believes more needs to be done to 'cut through' the circular argument regarding the need for infrastructure to be justified by density and increases in density to be justified by new infrastructure. Without addressing this point, it is difficult to reconcile the much-welcomed desire to sustainably intensify outer London.

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?

For delivering a step change in delivery, please see our response to Matter 18, re build out rates which sets out some of the policies – both existing and proposed – that will help to increase the rate of a delivery of new homes, including the threshold approach to affordable housing, greater funding for council housebuilding. As the Letwin Review into Build Out identifies, a greater diversity of affordable homes on a site can help this, but also a lot is outside of local authorities’ control once planning permission is granted.

The Assembly would like to see some kind of stepped or transitional arrangement with regard to the housing targets for boroughs, particular with regard to the small sites policy, where boroughs will find it difficult to identify and bring forward appropriate small sites by 2019.

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

Table 4.1 should not seek to determine types and tenures and this should be a matter for the individual borough Local Plans taking account of their own local and sub regional evidence. No. The Plan needs to emphasise more strongly the importance of boroughs meeting local and sub regional objectively assessed need.

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

The SHMA and the SHLAA need to be revisited, especially in the light of ONS new household projections and factors such as Brexit. The SHLAA will be updated and the SHMA will need to be revisited in the light of ONS and Brexit.

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?

The Assembly refers the Panel to earlier written statements on matters 10, 11 and 12 that relate to partnerships with authorities and the rest of the South East, especially around help with transport infrastructure, which should help to meet this annual target, and possibly more.

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

Yes